



## PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPIA”) – South Africa

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us, and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer's Contact Details	
Name	Justin Murray – Information Officer /Charisse White – Deputy Information Officer
Email Address:	privacy@originfp.com

### Our details:

Origin Impact Capital (Pty) Ltd  
Suite 10, The Yard Office, 71 Old Main Road, Hillcrest, Kwa-Zulu Natal  
Organisation E-mail address: [privacy@originfp.com](mailto:privacy@originfp.com)

The Organisation is an authorised financial services provider with FSP nr 46214. We render financial services in the following product categories: Research & Advise (category I)



### **The source of collection of your personal information:**

We collect personal information from the following data subjects:

- Clients and Prospective clients
- Our Service providers
- Enquirers and visitors to our website
- Employees and Potential Employees

Personal information is collected directly from you through the completion of our Origin Client/Supplier Due Diligence forms. These forms are completed either electronically or in hard copy.

We may also collect information about you from other sources such as external third parties (CIPC) and from cookies on our website.

### **Law authorising or requiring collecting of the personal information:**

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant services to you:

- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Insurance Act 18 of 2017;
- Short-Term Insurance Act 53 of 1998;
- Long-Term Insurance Act 52 of 1998;

### **Purpose for Processing your Information:**

We collect, hold, use and disclose your personal information mainly to comply with legal regulations and laws. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and Origin Impact Capital (Pty) Ltd
- To comply with our statutory obligations, including client identification and verification as part of our KYC and CDD obligations
- To verify the identity of our Customers in accordance with applicable Anti Money Laundering regulations
- To confirm, verify and update your details
- To comply with any other legal and regulatory requirements

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Origin Impact Capital (Pty) Ltd

[originfp.com](http://originfp.com)

**Directors: J. Murray, N. Jansen van Rensburg**  
*Company Registration number: 2014/263581/07*  
*FSP number: 46214*

Suite 10 – The Yard Office  
71 Old Main road  
Hillcrest, Kwa-Zulu Natal



Some of your information that we hold or require may include

- Your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, Passport or Identity Number.
- Names and Registration numbers as contained in documents issued by the Companies and Intellectual Property Commission and the South African Revenue Service; and
- Information which may be necessary to ensure our compliance with the Financial Intelligence Centre Act, 38 of 2001

Some of the aforementioned personal information may be mandatory and required by law.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider. Please note that we do require Mandatory information for any new business relationships before any services may be rendered to you as Customer.

### **Third parties and your personal information**

We may need to share your information to third parties in order to comply with laws and regulations. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The Compliance Officer of the organisation (where applicable);
- IT Consultants and service providers: Including hosting and cloud service providers such as Microsoft and GSuite, specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority;
- Where we have a duty or a right to disclose in terms of law or industry codes

### **The Storage and Transfer of your personal information outside of the Republic of South Africa**

Your information may be hosted/stored on servers managed by a third-party service provider, which may be located outside of South Africa such as Microsoft and GSuite

Origin Impact Capital (Pty) Ltd will ensure that the level of protection afforded to your personal information by that third country or international organisation is equal to the protection afforded by the POPI Act.

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## Security

We take reasonable technical and organisational measures to secure the integrity of your Personal Information and using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information, and protect your Personal Information from misuse, loss, alteration, and destruction.

We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.

**Despite the above measures being taken when processing Personal Information and Special Personal Information, as far as the law allows, we will not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of your Personal Information and/or Special Personal Information.**

Origin Impact Capital (Pty) Ltd has implemented policies and procedures to address actual and suspected data breaches and undertakes to notify you and the relevant regulatory authorities of breaches in instances in which Origin Impact Capital (Pty) Ltd is legally required to do so and within the period in which such notification is necessary.

## Retention of your Personal Information

- We may keep your Personal Information for as long as you continue to engage with us or use our products and/or services or for as long as reasonably necessary or until you contact us and ask us to destroy it. All Personal Information will be destroyed 5 years after termination of contract.
- We may retain and process some or all of your Personal Information if and for as long as:
  - we are required or permitted by law, a code of conduct or a contract with you to do so;
  - we reasonably need it for lawful purposes related to the performance of our functions and activities;
  - we reasonably require it for evidentiary purposes; or
  - you agree to us retaining it for a specified further period.
- To determine the appropriate retention period for Personal Information, Origin Impact Capital (Pty) Ltd will consider, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. Origin Impact Capital (Pty) Ltd will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of Personal Information, as well as our Record Retention Policy.



## Maintenance of your Personal Information

Where required by law, Origin Impact Capital (Pty) Ltd will take all reasonable steps to ensure that your Personal Information is accurate, complete, not misleading and up to date.

We also acknowledge that you may have rights of access to, and the right to rectify, your Personal Information, and rights to object to the processing of your Personal Information in certain circumstances.

You must let us know if any of the Personal Information that we have about you is incorrect, incomplete, misleading or out of date.

Where required by law, we will take reasonable steps to correct or update your Personal Information, accordingly, having regard to the purpose for which such Personal Information was collected or used.

## Complaints and objections

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you.
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed.
- Request that we consider your objections to the processing of your personal information.
- Lodge a complaint with the Information Regulator

Kindly send us an email on the following email if you have any query on the above or any complaint about Origin's processing of Personal data : [privacy@originfp.com](mailto:privacy@originfp.com)

## The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

Website: <https://www.justice.gov.za/inforeg/index.html>

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