

ASSET LEGACY (PTY) LTD

PRIVACY POLICY

Effective Date: 2026

1. Introduction

Asset Legacy (Pty) Ltd (“Asset Legacy”, “we”, “us”, “our”) is an authorised Financial Services Provider (FSP 16108) regulated by the Financial Sector Conduct Authority (FSCA) of South Africa.

We are committed to protecting your personal information in accordance with:

- The Protection of Personal Information Act, 2013 (POPIA)
- The Financial Advisory and Intermediary Services Act, 2002 (FAIS)
- The Financial Intelligence Centre Act, 2001 (FICA)
- Applicable FSCA conduct standards
- Any other relevant South African legislation

This Privacy Policy explains how we collect, use, store, protect, and process personal information obtained via this website and in the course of providing financial services.

2. What Personal Information We Collect

2.1 Website Interaction Information

- Name and surname
- Email address
- Contact number
- Information voluntarily submitted through contact forms
- Newsletter subscription information
- Technical data (IP address, browser type, device type)

2.2 Client Due Diligence Information (Where Applicable)

- Identity documentation
- Proof of address
- Financial information
- Banking details
- Investment portfolio information
- Risk profiling data
- Tax information
- Trust / estate documentation
- FICA-required verification documents

3. Purpose of Processing

We process personal information only for lawful purposes, including:

- Responding to enquiries
- Providing financial advice and intermediary services
- FICA compliance and client verification
- Regulatory reporting and compliance
- Risk profiling and portfolio construction
- Ongoing client servicing
- Communication of insights, updates, or professional commentary
- Legal and contractual obligations

We do not sell personal information.

4. Legal Basis for Processing

We process personal information under one or more of the following lawful bases:

- Your consent
- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests
- Regulatory requirements

5. Confidentiality & Professional Duty

As a licensed Financial Services Provider, we operate under strict fiduciary and confidentiality standards. Sensitive financial information is processed with professional discretion in accordance with FAIS conduct standards.

6. Information Security

We implement appropriate technical and organisational safeguards, including secure hosting environments, restricted internal access controls, encrypted communication channels where appropriate, controlled document handling procedures, and secure third-party service providers.

7. Sharing of Information

We may share information only where necessary, including with product providers, compliance officers, auditors, legal advisors, regulatory authorities, and approved service providers. All third parties are bound by confidentiality obligations.

8. International Transfers

Where global investment platforms or custodians are used, certain information may be processed outside South Africa. Appropriate safeguards are implemented where required.

9. Retention of Information

We retain records in accordance with FAIS, FICA, SARS requirements, and other applicable legislation. Financial advice records are typically retained for a minimum of five years or longer where required.

10. Your Rights Under POPIA

You have the right to:

- Access your personal information
- Request correction or deletion (subject to legal limitations)
- Object to certain processing
- Withdraw consent where applicable
- Lodge a complaint with the Information Regulator

Information Regulator (South Africa): <https://www.justice.gov.za/inforeg/>

11. Cookies & Website Tracking

This website may use limited cookies for basic functionality, website analytics, and performance optimisation. Users may disable cookies in browser settings.

12. No Advice Through Website Content

Content on this website, including insights and commentary, does not constitute financial advice. Advice is only provided following a formal engagement and appropriate risk profiling in accordance with FAIS requirements.

13. Contact Details

Asset Legacy (Pty) Ltd

Authorised Financial Services Provider – FSP 16108

Website: www.assetlegacy.one

14. Updates to This Policy

This Privacy Policy may be updated from time to time to reflect legal, regulatory, or operational changes. The latest version will always be published on this website.