

**FINANCIX**  
THE INVESTORS' ADVANTAGE

## Privacy Policy

Version 1.0

Last Update: July 1st 2024

## Sanus Financial Services (Pty) Ltd - Privacy Policy

The entire team here at Sanus Financial Services (Pty) Ltd cares and respects your privacy.

In this Privacy Policy (the “**Policy**”), we will refer to Sanus Financial Services (Pty) Ltd as “**us**”, “**our**”, “**we**”, and “**Sanus**”. We will also use contractions, such as “**we’ll**”, “**we’re**” etc.

When we are referring to the reader of this Policy, we are going to refer to you as “**you**”; and we will also use contractions, such as “**you’re**”, “**you’ll**” etc.

Our care and respect extend to the privacy of all of our customers, partners, and website visitors who come to [www.financix.com](http://www.financix.com) (the “**Website**”).

We collect and use any personal data in the following ways. Before we get onto discussing the “ways in which we collect and use personal data”, we do want you to know that everything that is described within this Policy is compliant with our obligations, and even more importantly, your rights under the laws of the Republic of South Africa and the European Union.

### 1 Information about us – Sanus Financial Services (Pty) Ltd (“**Sanus**”)

Sanus Financial Services (Pty) Ltd is our registered company name. We trade online under the name: “*Financix*”.

#### 1.1 What is Sanus Financial Services (Proprietary) Limited?

Sanus Financial Services (Pty) Ltd is our company name and we have a Website, which is located at <https://www.financix.com/>

#### 1.2 Where is Sanus based?

Sanus is based in the Republic of South Africa; and our registered address is 17 Midas Avenue, Olympus, Pretoria, Gauteng, South Africa.

Sanus’s company registration number is 2020/659426/07 and it is incorporated in South Africa.

### 2 What our Privacy Policy covers

We’ve carefully put together this Policy so that you can better understand how we use your personal data. Within this Policy, we cover the following -

#### A. POPIA and explain how we adhere to the POPIA laws.

**SOUTH AFRICAN CLIENTS**A. Protection of Personal Information Act, Act 4 of 2013 (“**POPIA**”)

1. Unless inconsistent with the context, the terms set out *below* mean the following for the purposes of this paragraph:

**Etilep** means Etilep Limited, incorporated with registration No. HE 045229;

**Group** means Etilep, including: (i) its subsidiaries and affiliates; (ii) us; (iii) any successors in title and assigns;

**Personal information** means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to:

(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

(b) information relating to the education or the medical, financial, criminal or employment history of the person;

(c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

(d) the biometric information of the person;

(e) the personal opinions, views or preferences of the person;

(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(g) the views or opinions of another individual about the person; and

(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

**POPIA** means the Protection of Personal Information Act, Act 4 of 2013, as amended;

**Processing** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including -

(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

(b) dissemination by means of transmission, distribution or making available in any other form; or

(c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

**Process** and **Processed** will have a similar meaning to Processing when used herein.

2. **CONSENT TO COLLECTION**: You consent to us COLLECTING your Personal Information from you and, where lawful and reasonable, from public sources for fraud prevention and compliance purposes, as well as the purposes set out herein.

3. **CONSENT TO SHARE**: You acknowledge and agree that it may be necessary for us to SHARE your Personal Information from time to time within the Group and with regulatory bodies (such as the FSCA or FIC, or similar); and that we will only do this when appropriate or necessary, in order to provide the products and/or services to you and to comply with the laws and our policies and procedures.

You consent to us providing your Personal Information to the aforementioned third parties for these purposes.

4. **CONFIRMATION RE THIRD PARTY INFORMATION**: You confirm that, if you give us Personal Information about or on behalf of another person (including Authorized Signatories, account signatories, shareholders, principal executive officers, trustees and beneficiaries), you are authorised to:

- (a) give us the Personal Information of those third parties;
- (b) consent on behalf of those third parties to the Processing of their Personal Information, specifically any cross-border transfer of Personal Information into and from the country where the products or services are provided; and
- (c) receive any privacy notices on behalf of those third parties.

5. **CONSENT TO PROCESSING**: You consent to our Processing your Personal Information:

- (a) for the purpose of providing products and services to you in terms of any agreements concluded between us and you;
- (b) for the purpose of providing any other products and services for which we may offer to you and for which you may apply;
- (c) for the purpose of carrying out statistical and other analyses to identify potential markets and trends and evaluate and improve our business (which includes improving existing and developing new products and services);
- (d) in countries outside the country where the products or services are provided, which countries may not have the same data protection laws as the country where the products or services are provided -
  - where reasonably practicable, we will ask the receiving party to agree to our privacy policies if they need access to any Personal Information;
- (e) by sharing your Personal Information with any other third parties, where necessary, so that we can provide the products and services to you, locally and outside the country where the products or services are normally provided -
  - where reasonably practicable, we ask people who provide services to us to agree to our privacy policies if they need access to any Personal Information to be able to provide their services; and
- (f) within the Group.

6. **PROCESSING PRACTICES**: You will find our Processing practices in our privacy policies and those of the Group –

these statements are available on our websites or on request to the Compliance Officer.

7. **TAX AND LEGAL POSITION:** If you are unsure about your tax or legal position due to your Personal Information being processed in countries other than where you live, you should procure independent legal advice.

8. **INFORMATION OFFICER:** The Compliance Officer is the Information Officer for the purposes of POPIA and his email is: [nic.l@sanusfinancial.com](mailto:nic.l@sanusfinancial.com)