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## THE PROTECTION OF PERSONAL INFORMATION ACT PRIVACY NOTICE

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This privacy notice applies to personal information processed by the ATM Group in connection with products and/or services we offer in accordance with the requirements of the Protection of Personal Information Act (POPIA).

### Privacy Statement

The ATM Group is committed to processing personal information in accordance with the below principles when collecting, recording, storing, disseminating, and destroying personal information, and responding to government requests for our users' data:

- I. We shall not contact/solicit you unless you have given us your consent to do so.
- II. We shall process information for a specific and lawful reason, and only adequate and relevant information which is limited to the purposes for which they are processed and which relates to the functions or the activity of the organization.
- III. We inform clients upfront that we will be processing data in fulfillment of their requests. If you cancel your services with the ATM Group, we will delete or otherwise de-identify your personal information after the minimum storage periods required under our risk and statutory record-keeping periods have expired.
- IV. We take measures to ensure data is kept safe and prevent loss of, damage to, or unauthorized destruction of personal information, and unlawful access to or processing of personal information.

### Security

A client has a right to object to the use of personal information, however in certain instances failure to provide us with personal information may result in the inability to deliver said services or products to you, or alternatively, you shall receive limited services. The ATM Group collects information directly from you where you provide us with your personal details. In addition to the aforementioned we shall, subject to your consent, obtain further information required from third parties and other sources where necessary. The ATM Group does not collect and process the special personal information unless it is a requirement by law to process such information as part of our service delivery, in which case we shall obtain consent from you before collection thereof. We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent/s or guardian.





### **Disclosure**

The ATM Group and its employees may disclose personal information: to other services providers involved in the rendering of services or the provision of products to the clients; to services providers, it is engaged with such as accountants, compliance officers, administration, etc. If the ATM Group has a duty or a right to disclose same in terms of law or certain industry codes; or if it is necessary to protect the ATM Group's legal rights and interests. We undertake to review and update our security measures in accordance with future legislation and technological advances. Access to client data, from within our organization, is limited to essential staff or specialist contractors that are required to access our systems for client service or maintenance purposes; they are bound by the requirements of the legislation and are required to maintain safety and security measures. The organization will not transfer personal information to a third party in a foreign country, without ensuring that it complies with the provisions of POPI.

### **Policy Changes**

This notice was last revised on 1 July 2021. Any material changes hereto will be published on our website or distributed to clients in writing. Your continued use of our services following the update means that you accept the ATM Group's updated notice.

### **Questions or Complains**

Should you have any questions relating to this notice or wish to lodge a complaint relating to an interference with the protection of personal information, you can contact the Information Officer. Our Information Officer is: **Christine Strydom, Financial Manager** at [christine@atmg.co.za](mailto:christine@atmg.co.za)

