

# PRIVACY AND SECURITY STATEMENT

*Effective date: 11 February 2019*

Your right to privacy and security is very important to us. We, STANLIB Limited and its subsidiary companies ("STANLIB"), treat personal information obtained through the use of this website as private and confidential and are committed to providing you with secure access to our online services.

This privacy notice is provided to you so that you can make an informed decision as to whether or not you would like to use this website and its products and services. By using any of STANLIB's websites, you agree to be bound to this notice. If you do not agree to be bound by this privacy notice, you must stop using this website immediately.

What personal information do we collect and process?

In general, STANLIB only collects and processes personal information which you voluntarily provide to us. Details of the categories of personal information collected and processed are available in our [PAIA Manual](#).

Some information may be collected automatically whenever you visit the site. This is largely used for analytics purposes to better understand how visitors are using the website, but may include your IP address, browser and/or operating system information, the date and time you visited the website, the amount of time you spent browsing the site, your geographic location (if you have enabled this functionality on your browser), the pages you view while using the website, and any search terms you enter into the website's search bar. This information is aggregated and therefore individual personal information, behaviour or patterns cannot be identified.

In some cases, external parties contracted to STANLIB may perform collection or other processing activities on our behalf. These external parties are obligated to abide by data protection laws as well as minimum privacy standards in contractual obligations that STANLIB enforces as part of our agreements with them.

## How we use the personal information we collect

In order for STANLIB to meet our obligations to you we need to collect personal or other information to service your contractual needs for the product offering(s) you have taken up with us, to follow your instructions, to contact you in the event you have logged a query or complaint via our website, to inform you of new services and to ensure that our business is geared towards your needs. We will not use your information for any other purposes without your consent.

## Electronic Communications and records

By visiting this website or communicating with us by electronic means, you consent to receiving communications automatically and agree that all agreements, notices, disclosures and all other communications transmitted by electronic means satisfies any legal requirement, including but not limited to the requirement that such communication should be "in writing". Should you inform STANLIB that you do not want us to use your personal information as a basis for further contact with you or for any other purpose, we will not do so.

## Cookies

On some parts of our website we use so-called “cookie” technology. Cookie technology consists of small pieces of data or a small text file, which is given to your browser by our webserver when you visit our website. This data is stored on your browser. The cookie is sent back to our webserver each time you visit our website. Cookies are not computer programs and do not run on a computer like programs do. They cannot gather information or function on their own. They cannot collect any personal information about you or your machine and cannot gather data or information about what you do on the Internet. Cookies merely enable us to provide a more valuable online experience to you. While you can set up your Internet browser to disable cookie technology, we do not recommend that you do this since some parts of this website and our online services may not function properly, or at all.

## Third parties

STANLIB makes use of third parties to collect and process your personal information in order to provide products and services to you. Whenever we commission other organisations to provide support services to us, we will bind them to our privacy policies as far as they may be required to have access to our customers’ personal information to perform such services through contractual agreements. Our third parties are not permitted to use the information for any other purposes beyond those for which it was collected.

## Our website may contain links to or from other sites

While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content or the security or privacy practices employed by other websites. We recommend that you always read the privacy and security statements on such websites. This includes any social media organisations who may collect data from you should you choose to use any social media sharing buttons on our website.

## When we will disclose personal information without consent

All personal information supplied to STANLIB or collected by us is kept strictly confidential and will not be sold or given to any unauthorised third parties. STANLIB will only disclose or report personal information if and when required to do so by law or any regulatory authority, to our employees, or agents who require such information to carry out their duties and to our auditors so that they can perform their duties to us.

We will not disclose personal information to anyone outside STANLIB without your permission unless:

- we are compelled to do so by law or in terms of a court order;
- it is in the public interest to do so;
- it is necessary to protect our rights.

Access to your personal information held by STANLIB may also be requested by yourself or third parties. The Promotion of Access to Information Act, 2 of 2000 regulates and sets out the procedure for such a request and under what circumstances such access may be refused. You can access our [PAIA Manual](#) here.

## Storing personal information

Personal information we collect via the website is stored in a secure environment and is not available to any person outside STANLIB.

We only keep your personal information for as long as:

- we need it to achieve the purposes set out above;
- any law or contract requires us to keep the information; or
- STANLIB needs it for lawful purposes linked to its functions.

Once we are no longer authorised to keep your information, we will take one of the following actions:

- destroy the information;
- delete the information in such a way that it cannot be recovered; or
- de-identify the information in a manner that cannot be linked back to you or used to identify you.

## Our security practices

STANLIB is committed to providing secure online services which protect the quality and integrity of your personal information. STANLIB has implemented appropriate security measures to help it keep your information secure, accurate, current, and complete. As such, all interactions with our transactional websites are protected through encryption that complies with international standards. Encryption is used to protect the transmission of your personal information when completing online application forms. Our Internet servers are protected by firewalls and intrusion detection systems. Access to information on these servers is restricted to authorised personnel only. However, STANLIB cannot guarantee the security of any information you transmit to it online and you do so at your own risk.

## Data Breaches

In the event that STANLIB becomes aware that your personal information has been compromised in any way, we will notify you and the relevant Regulatory Authorities within the prescribed timelines, so that you are aware of the nature of the breach and what actions you may need to take in order to protect yourself.

## Right to amend this privacy and security statement

We reserve the right to amend this privacy and security statement at any time. When we do, we will revise the last updated date at the top of this notice. All amendments to this privacy and security statement will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this privacy and security statement. It is your responsibility to check for changes each time you visit our website. If you use the website after any changes to this privacy notice have been made, we will assume that you agree to all of the changes.

## How to contact us

If you wish to access, correct or update information which STANLIB has collected about you or exercise any of your other rights related to your personal information, you can log on to [STANLIB online here](#) to modify your profile online, or call our contact centre on 0860 123 003.

If you have any questions regarding this privacy notice or our privacy and security practices, please contact our privacy representatives via the following channels:

### STANLIB Limited:

Information Officer STANLIB  
17 Melrose Boulevard  
Johannesburg  
2196  
South Africa  
Telephone: +27 11 448 5000/ +27 11 448 6000  
Email: [privacy@stanlib.com](mailto:privacy@stanlib.com)

### STANLIB Jersey / Offshore:

STANLIB Fund Managers Jersey Limited  
47-49 La Motte Street  
St. Helier  
Jersey  
JE2 4SZ  
Telephone: +44 1534 881400  
Email: [sfmj@stanlib.com](mailto:sfmj@stanlib.com)

### European Union:

Please send an email to STANLIB's appointed data protection representative on:  
[EURepresentative@standardbank.com](mailto:EURepresentative@standardbank.com)

Or for general queries, send an email to STANLIB Limited: [privacy@stanlib.com](mailto:privacy@stanlib.com).