

galileocapital

Challenging Conventional Wisdom

GALILEO CAPITAL GROUP PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPIA”)

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You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.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	Frank Daubenton
Contact Number	011 502 8810
Email Address:	compliance@galileocapital.co.za

Our details:

Galileo Capital Group (Pty) Ltd

Fountain Grove Office Park, 5 Second Road, Hyde Park. Johannesburg. 2195.

Organisation E-mail address: ask@galileocapital.co.za

The source of collection of your personal information:

We collect personal information directly from the following data subjects:

- Prospective clients who enquire about our financial services.
- Clients who have appointed a Galileo Capital Group financial representative as their broker or intermediary
- Policyholders who enter into a policy with an Insurer via Galileo Capital Group
- Investors who invest into an investment product with a Investments house or asset manager via Galileo Capital Group
- Prospective clients booking appointments with a Galileo Capital Group financial planner for an hourly consultation.
- We may also collect information about you from other sources such as Astute, and Docfox with your authorization. Astute to help us identify and verify your investments and policy information to conduct a financial needs analysis on you and Docfox to assist us with our FICA compliance obligations.

Law authorising or requiring collecting your 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 financial 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 personal Information:

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. 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 Galileo Capital Group.
- Providing you with advice, products and services that suit your needs and as requested by you.
- To verify your identity as required by the Financial Intelligence Centre Act 38 of 2001.
- To issue, administer and manage your investments and other financial planning needs.
- To process claims and to assisting you to change investments from one product provider to another.
- To notify you of new products or services that may be of interest to you.
- To confirm, verify and update your details
- To comply with any other legal and regulatory requirements.

Some of the aforementioned personal information may be mandatory to provide within the context of product providers' requirements and disclosures.

Failing to provide compulsory information may lead to Galileo Capital Group's inability to carry out the functions necessary to perform as an authorised financial services provider.

The below table summarizes what personal information we collect, from whom we collect it and for what purpose it is collected:

What (Personal Information)	From Whom (Collection Source)	For What (Purpose)
Contact information, marital status, birth date, budget, financial portfolio, financial goals, dependents, occupation, banking details	Client, 3 rd Party Product Providers, Astute	Client: Financial Needs Analysis, Record of Advice, Financial Plan. Business: Maintain personal information records Business: Contractual obligations (Letter of Engagement)
ID/ passport number, residential address, bank details, tax number legal entity information and structure.	Client, 3 rd Party Docfox	Business: Compliance Requirements (e.g FICA)
Website browsing behavior data	Galileo Capital website (Cookies)	Business: Business Data Analytics
Product Provider financial data feeds	3 rd party Product Providers	Client: Consolidated Client Reporting

Third Parties and your personal information

We may need to share your information with third parties that provide advice, reports, analyses, products, or services that you have requested. 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 Galileo Capital Group. (where applicable)
- Your employer. (where applicable)
- Third Party service providers that assist with collation and consolidation of data from product providers.
- Third Party CRM providers that provide us with customer relationship platforms and systems.
- Third Party software financial planning tool providers that assist us with doing a financial needs analysis for you.
- Analytics and search engine providers assisting in the enhancement of our website.

- Information Technology specialists assisting us with data storage, security, processing, analytics, etc
- Auditors of Galileo Capital Group for financial auditing purposes
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority.

The Transfer of your personal information outside of the Republic of South Africa

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. The following third-party service providers store information outside of South Africa :

Third-Party Service Provider	Location
GRID	European Union, Denmark
Finametrica	Sydney, Australia and United States
Docfox	United States
Microsoft	European Union (will gradually be transferred to South Africa)

Your information may be hosted on servers managed by a third-party product provider, which may be located outside of South Africa. The following third-party product providers store information outside of South Africa :

Third-Party Product Provider	Location
SwissQuote	European Union, Switzerland
Canaccord Genuity Wealth	Guernsey, Channel Islands
Prescient	European Union, Ireland

We confirm 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.

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 (please request Personal Information Request Form from Information Officer);
- Request that we consider your objections to the processing of your personal information (please request POPI Complaint Form from Information Officer);
- Lodge a complaint with the Information Regulator (please request POPI Complaint Form from Information Officer).

The forms for any of the above requests are available through access to our PAIA Manual in addition to contacting our Information Officer.

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

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