
PRIVACY NOTICE

In compliance with the Protection of Personal Information Act, 2013 (“POPIA”)



Table of Contents

1. APPLICATION OF THE POLICY	2
2. PURPOSE OF THE POLICY	3
3. DEFINITIONS	3
4. WHY WE COLLECT PERSONAL INFORMATION ABOUT YOU.....	5
5. TYPES OF INFORMATION COLLECTED AND PROCESSED.....	6
6. WHERE WE GET YOUR PERSONAL INFORMATION FROM	8
6.1 Information that you provide to us	8
6.2 Information that we collect or generate about you.....	8
7. HOW WE USE YOUR PERSONAL INFORMATION AND WHY.....	9
8. CONSENT TO USE YOUR PERSONAL INFORMATION	11
9. SHARING OF YOUR PERSONAL INFORMATION WITH OTHER PARTIES.....	12
10.SECURITY SAFEGUARDS OF PERSONAL INFORMATION	14
11.YOUR RIGHTS ('DATA SUBJECT' RIGHTS).....	14
12.OUR WEBSITE.....	15
13.FUTURE CHANGES TO THIS PRIVACY POLICY.....	15
14.COMPLAINTS REGARDING THE PROTECTION OF PERSONAL INFORMATION	16
15.DOCUMENT REVISION AND APPROVALS	17

1. APPLICATION OF THE POLICY

- 1.1 The Premier Group, as set out in the organisational organogram as amended from time to time, relates to a group of companies that constitutes a holding company and subsidiaries, referred to hereinafter as "we/our", "the Company" or "the Group", each possessing their individual set of business practices and risks. To ensure consistency and compliance across our entire organisation, we have developed this comprehensive Policy that applies to all our subsidiary and associate companies, pertaining to all aspects of their operations and business dealings. This Protection of Personal Information Policy (Privacy Policy / Policy) is compiled in terms of the Promotion of Access to Information Act, No 2 of 2000, the Protection of Personal Information Act no 4 of 2013 (POPIA) and the General Data Protection Regulation (GDPR) when applicable.
- 1.2 The Retirement Funds are distinct legal entities, established by a Sponsor that is part of the Premier Group, and administered by a Premier Group entity. Accordingly, this policy also applies to the Retirement Funds.
- 1.3 This Policy applies to you if you are a Data subject, thus either being a :
 - 1.3.1 a user of our website, platforms, and/or applications; or
 - 1.3.2 a client to whom we provide a product /service; or
 - 1.3.3 an employee, director, trustee, or business associate of the Group.
- 1.4 It is important that you read, understand, and accept our terms of service if you would like to use our services. You must accept all the terms of this Policy when you apply to our products or services. If you do not agree with anything in this Policy, then you may not apply for our products or services. You may not apply for our products or services if you do not accept this, Policy.
- 1.5 By accepting this Policy, you are deemed to have read, understood, accepted, and agreed to be bound by all its terms.
- 1.6 You may only send us your own Personal information or the information of another Data subject where you have their permission to do so.

2. PURPOSE OF THE POLICY

- 2.1. The Protection of Personal Information Act, 4 of 2013, (“POPIA”), which came into force on 1 July 2021, is a statute that regulates the use and processing of a person and/or legal entity’s personal information.
- 2.2. This Privacy Notice explains how we collect, use, disclose, and protect your Personal information, as well as your rights in the event of a Personal information breach.

3. DEFINITIONS

- 3.1. **Authorities:** means the Prudential Authority as established in terms of section 32 of the Act and the Financial Sector Conduct Authority as established in terms of section 56 of the Act;
- 3.2. **Compliance Officer:** means the person appointed by the Group as the legal and governance compliance officer;¹
- 3.3. **Data subject:** means the person to whom personal information relates;
- 3.4. **Information officer:** means the head of the juristic entity;²
- 3.5. **Information Regulator:** means an independent body established in terms of POPIA and is amongst others empowered to monitor and enforce compliance by public and private bodies with the provisions of PAIA and POPIA
- 3.10. **Material incident:** means a disruption of a business activity, process or function which has, or is likely to have, a severe and widespread impact on the financial institution’s operations, services to its customers, or the broader financial system and economy;
- 3.12. **Operator:** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;
- 3.13. **Personal information:** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –
 - a) information relating to the race, gender, sex, pregnancy status, 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;

¹ The Group appointed Monique Collyer as Compliance Officer.

² Honey Investment Solutions (previously Premier Product Solution)’s appointed IO is Chad Menton. Premier Benefits’ appointed IO is the director. The Retirement Funds appointed the principal officer as its IO.

- 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;
- 3.16 **POPIA:** means the Protection of Personal Information Act, 2013 (act 4 of 2013) (as amended from time to time);
- 3.17 **POPIA (data) breach:** means when there is unauthorized access, loss, disclosure, destruction, or alteration of personal information of any nature (regardless of the harm or risk posed to the data subject). Examples include:
- a) Accidental or unlawful disclosure of personal information
 - b) Loss or theft of devices containing personal information
 - c) Cyberattacks or hacking incidents
 - d) Employee negligence leading to unauthorized data exposure
- when there are reasonable grounds to believe that any unauthorized person has accessed or acquired personal information under the control of the Group, or if data has been intentionally or accidentally lost, shared or destroyed. Data breaches may occur in different ways, including but not limited to hacking, theft, accidental loss and unauthorized use of personal information. Remember that a data breach can take place through either physical or electronic means. This means that the theft of a laptop containing potentially personal information of your clients, will constitute a data breach in terms of POPIA.
- 3.18 **Responsible party:** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;
- 3.19 **Retirement funds** mean the Honey (previously Premier) Retirement Annuity Fund, registration number 12/8/38196; the Honey (previously Premier) Preservation Fund, registration number 12/8/38197; the Prime Pension Fund, registration number 12/8/37068; and the Prime Provident Fund, registration number 12/8/37069;
- 3.20 **Senior Management:** means –
- (a) the chief executive officer or the person who is in charge of the Group; or
 - (b) a person, other than a director or a head of a control function-
 - (i) who makes or participates in making decisions that-
 - (aa) affect the whole or a substantial part of the business of the Group; or
 - (bb) have the capacity to significantly affect the financial standing of the Group; or
 - (ii) who oversees the enforcement of policies and the implementation of strategies approved, or adopted by the governing body;
- 3.21 **Sponsor** means the entity who established and/or supports the Retirement funds, noted within each set of fund rules.

- 3.22 **Supporting documentation:** means all documentation used in the computer system in the construction, clarification, implementation, use or modification of the Software or data.

4. WHY WE COLLECT PERSONAL INFORMATION ABOUT YOU

- 4.1. Personal information includes information the Group collects:
- 4.1.1. automatically when you visit our website or on completing of applications;
 - 4.1.2. on registration;
 - 4.1.3. on submission; and
 - 4.1.4. optional information you provide to us voluntarily;
- 4.2. Personal information **excludes:**
- 4.2.1. information that has been made **anonymous** so that it does not identify a specific person;
 - 4.2.2. permanently **de-identified** information that does not relate, or cannot be traced back to you specifically;
 - 4.2.3. **non-personal statistical** information collected and compiled by us; and
 - 4.2.4. information that you have provided voluntarily in an open, **public** environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this Policy).
- 4.3. The Group may use or process any products or services information, or voluntary / optional information provided to us for the purposes indicated when the data subject agreed to provide it to us. Processing includes:
- 4.3.1. gathering personal information;
 - 4.3.2. disclosing it, and
 - 4.3.3. combining it with other personal information.
- 4.4. When you apply to become a client, member, or investor, and during our dealings with you, we will collect some Personal information about you. This includes what you tell us about yourself and what we learn by having you as a client. Whether this collection is mandatory, or voluntary will depend on the reason we are collecting your Personal information. If you refuse or fail to supply this information, we will not be able to enter a business relationship with you.
- 4.5. Most of this information is necessary for us to comply with our legal obligations, to enter into an agreement with you, or for legitimate business purposes.

- 4.6 You may voluntarily contact us about additional /optional services or products where you are an existing client, member or investor or any of our products and services, where you are not a client, member or investor. In this instance you are in control of what information you volunteer, and which is subsequently collected by us.
- 4.7 We may use or process any products or services information, or voluntary / optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We collect and process your personal information for various purposes, including:
- 4.7.1 **products or services purposes** – such as collecting applications or requests for and providing our products or services;
 - 4.7.2 **marketing purposes** – such as pursuing lawful related marketing activities;
 - 4.7.3 **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
 - 4.7.4 **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.
- 4.8 We may use your website usage information for the purposes described above and to:
- 4.8.1 remember your information so that you will not have to re-enter it during your visit or the next time you access the website or applications;
 - 4.8.2 monitor website and application usage metrics such as total number of visitors and pages accessed; and
 - 4.8.3 track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website or applications.
- 4.9 We may send administrative messages and email updates to you about the products and services you subscribe to. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages and unsubscribe from email updates. We will not send you promotional messages unless you have chosen to opt into them.

5. TYPES OF INFORMATION COLLECTED AND PROCESSED

5.1 General information:

- 5.1.1 Identifying information: your name and/or date of birth or identification number of any kind;
- 5.1.2 Contact information: your phone or mobile number and/or email address;
- 5.1.3 Address information: your physical and/ or postal address;
- 5.1.4 Demographic information: your gender and /or marital status.

5.2 Sensitive personal information:

- 5.2.1 Financial information: your bank account details;
- 5.2.2 Sensitive demographic information: your race and ethnicity;
- 5.2.3 Medical information: information about your physical and /or mental health;
- 5.2.4 Criminal information: information about a charge or alleged charge of any offence and / or about any related legal proceedings; or
- 5.2.5 Employment information: your membership of a trade union.

5.3 Application Information:

If you submit an application to become a client, member or investor or are already one, we may collect the following from you:

- 5.3.1 Your name and surname or your company name, company registration number and VAT number;
- 5.3.2 your date of birth and / or age and /or proof of identification in the form of copies of your passport, driving license or other identity documents;
- 5.3.3 your postal and /or street address;
- 5.3.4 financial information, including your bank account information, the amount you are looking to invest, and any monthly payments you may wish to make, your investment selection(s) and your bank details for any relevant income or redemption payments to be made;
- 5.3.5 personal information and contact information which you provide in correspondence with us, whether by email, written letter, or telephone call or through our online enquiry system (this will be information volunteered by you, it could include the reasons why you have decided to invest, or where your investment money has come from, by way of example); and/or
- 5.3.6 information relating to your use of our service and products.

5.4 Website use information:

When you interact with our website:

- 5.4.1 where you have an account, financial information such as portfolio and account numbers, as well as your login information, including your username and password encryption key;
- 5.4.2 where you apply for employment, such information may include education and qualification details, training and professional memberships and accreditations, date of birth; and/or
- 5.4.3 technical information about our products and services and how you use them;
- 5.4.4 We may collect certain information from your web browser, including your Internet usage information when you visit our website:
 - a) We may place small text files called ‘cookies’ on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve several useful purposes for you, including:
 - i. tailoring our website’s functionality to you personally by letting us remember your preferences;

- ii. improving how our website performs;
 - iii. allowing third parties to provide services to our website
- b) Your internet browser accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies, and you can find out more about this in our **Cookie Policy**.

5.5 Regulatory and Compliance use:

In addition to the above, we collect the following information from you when required:

- 5.5.1 your tax residency and/or nationality;
- 5.5.2 personal information which we obtain from identity verification agencies;
- 5.5.3 information about your employment status (including whether you are employed, retired, or receive benefits) and regarding the source of your wealth; and/or
- 5.5.4 to secure your online validation facility, the answers to security verification questions, and / or your username.

6. WHERE WE GET YOUR PERSONAL INFORMATION FROM

We may have information about you that you did not provide to us yourself. We collect personal information in the following ways:

6.1 Information that you provide to us

We typically collect personal information directly from you as part of our client / member / investor onboarding process when you complete an application form and provide proof of your identity. Additionally, we collect personal information from you when you correspond with us (whether by telephone, e-mail, or through our website) or complete a request for a product or service. The nature of our relationship with you will determine the kind of personal information we might ask for.

6.2 Information that we collect or generate about you

We will continue to collect additional personal information that we learn about you during providing our products and services, such as:

- 6.2.1 the way you use our online services; and / or
- 6.2.2 information which you provide in correspondence to us (whether by telephone, e-mail, or through our website), including contact history.

6.2.3 all emails you send to us to the email addresses we provided in this Policy or on our website. This enables us to scan the same for viruses and monitoring the content and information transmitted through our system. Additionally, we may track whether you open emails we send.

6.3 Information that we obtain from other sources

Sometimes we collect additional information about you from third parties. Specifically, we will obtain information about you from:

6.3.1 agencies who we use to monitor and prevent money-laundering;

6.3.2 agencies that provide us with background checking services; and / or

6.3.3 a third party who you have appointed to deal with your investments on your behalf (such as an investment advisor or wealth manager).

7. HOW WE USE YOUR PERSONAL INFORMATION AND WHY

7.1 We need to use some personal information to provide you with our service and to fulfil our contract with you.

7.2 We use the personal information we hold about you where it is necessary for us to fulfil our contract with you and / or to enable us to comply with legal obligations. Your personal information will also be used when it is in our legitimate interest. A legitimate interest is when we (and sometimes third parties) have a business or commercial reason to use your information. But even then, our legitimate interest must not unfairly go against what is right and best for you.

7.3 Each of these categories is a 'legal basis' that allows us to process your information under data protection law. We provided more information below about what this means, in terms of how we process, or the purposes for processing your personal information relevant to each legal basis.

7.4 We need to use some personal information to provide you with our service, to fulfil our contract with you and / or to comply with our legal obligations. These include:

7.4.1 to communicate with you about your investment(s), product, or service (i.e., periodic statements);

7.4.2 to verify that your instructions are genuine and to process them accordingly;

7.4.3 to enable us to process your subscription, switch, claim, transfer, or redemption instruction;

7.4.4 to enable payments to be made;

7.4.5 to notify you about changes to your investment(s);

7.4.6 to allow you to exercise rights in relation to your investment(s) (such as voting rights);

7.4.7 to evidence your ownership of an investment;

- 7.4.8 to recover any money amount owed to us;
- 7.4.9 to investigate and deal with complaints or disputes;
- 7.4.10 to contact you when we have updated this Privacy Policy and consider that it is necessary to advise you about any changes to the way we are processing your personal information;
- 7.4.11 to transfer your personal information to any third party who replaces a Premier company as a provider of services to you;
- 7.4.12 to share your personal information with third parties (such as our service provider who assists us administer or process transactions on our behalf) if required for the management of your product or service;
- 7.4.13 to verify your identity and to carry out regulatory checks (such as anti-money laundering and identity verification checks);
- 7.4.14 to enable a register of investors to be maintained;
- 7.4.15 to contact you with notices about your investments and to organise extraordinary general meetings of the funds;
- 7.4.16 determining the outcome of investor votes (such as the verification and counting of proxy cards);
- 7.4.17 to detect, prevent and/or investigate fraud, money laundering and other financial crimes;
- 7.4.18 to comply with audit requests from our auditor; or the auditor or depository of the fund you invest into (if we are not able to anonymise / redact information);
- 7.4.19 to combat and maintain controls in respect of late trading and market timing practices;
- 7.4.20 to ensure you are eligible for a product;
- 7.4.21 to verify the adequacy of your income, net worth, or investment experience for product applicability;
- 7.4.22 to comply with requests made by you when exercising your legal rights (such as those contained within this Privacy Policy);
- 7.4.23 to carry out monitoring of trades and transactions for continued compliance with our regulatory obligations (such as anti-money laundering) and to keep records of the transactions we have undertaken;
- 7.4.24 to relieve any legal obligations imposed on us by any authority;
- 7.4.25 identification verification, and any anti-fraud, anti-money laundering and such other checks to confirm your identity and to ensure that the investments which we handle for you are done in compliance with our legal obligations;
- 7.4.26 recording incoming and outgoing calls for training, monitoring, and security purposes, as well as to keep an accurate record of any instructions received from you in relation to your investments;
- 7.4.27 administering and managing your account(s) and services relating to that, updating your records, tracing your whereabouts to contact you about your account;
- 7.4.28 to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators;
- 7.4.29 for management and audit of our business operations including accounting;

- 7.4.30 reviewing and improving the information provided on our website to ensure it is user friendly and to prevent any potential disruptions or cyber-attacks;
- 7.4.31 conducting analysis required to detect malicious data and understand how this may affect your IT system;
- 7.4.32 for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
- 7.4.33 to carry out searches at identity verification agencies pre-application, at the application stage, and periodically after that; and
- 7.4.34 to determine the target market for our existing and future products (e.g., determining whether a product is meeting the needs of investors).

8. CONSENT TO USE YOUR PERSONAL INFORMATION

- 8.1 Where we are relying on your consent to process your personal information, you are entitled to withdraw your consent at any time. However, we are usually processing your personal information for legitimate reasons, in which case withdrawing your consent will not change how we process your personal information.
- 8.2 If you wish to withdraw your consent you may do so by contacting us by sending an a-mail to info@honeyinvestments.co.za.
- 8.3 We will rely on your consent:
 - 8.3.1 when you request that we share your personal information with someone else;
 - 8.3.2 where you have opted-in to receiving marketing communication; and / or
 - 8.3.3 when you volunteer information to us in correspondence, which information we need to respond to your enquiry, and only where lawful to do so.
- 8.4 You have the right to withdraw your consent at any time, however, the withdrawal of your consent will not invalidate any processing which we previously undertook before you withdrew your consent.
- 8.5 Please note that, where we rely on another lawful reason to process your personal information which does not require your consent, withdrawing your consent will not affect that processing. This is the case where the processing is necessary for our fulfilling our contract with you, or where we must process your personal information to comply with the law, as described above. We will continue to process your personal information for those lawful purposes notwithstanding the fact that you have withdrawn your consent for one of the above-listed purposes that requires your consent.

- 8.6 Where you choose not to provide us with voluntary personal information this may reduce the quality of service, we are able to provide.
- 8.7 Please keep your personal information accurate and up to date by accessing your account online, emailing us, or phoning us. We will try to keep the personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this Policy. Sometimes, we may request you update your personal information on the website, application or through other channels. You can review or update any personal information we hold on you by accessing your account online, emailing us, or phoning us. Please note that to better protect you and safeguard your personal information, we verify your identity before granting you access to your account or making any corrections to your personal information.
- 8.8 We do not knowingly collect personal information of children without the consent of a parent or guardian. If you are younger than 18 years old, we will always ask for consent to process your personal information from your parent or guardian.

9. SHARING OF YOUR PERSONAL INFORMATION WITH OTHER PARTIES

- 9.1 Your personal information may /will be shared with other businesses, regulators, and authorities.
- 9.2 If you have further questions about the third parties, we share your personal information with, please contact us.
- 9.3 We are at times mandated by law to disclose your personal information to third parties (such as Tax authorities). In addition, where we have contracted third parties (which are helping us run our business or fulfil the operation of the fund), we will also disclose your personal information to those third parties, but always subject to appropriate contracts and safeguards.
- 9.4 We will not sell, rent or trade your personal information.
- 9.5 We may also share your information with regional and overseas regulators and authorities in connection with their duties (such as crime prevention), and / or in connection with our compliance with legal and / or regulatory obligations.
- 9.6 In some jurisdictions, we are required to share information on substantial investors with the market / local exchanges / regulators for market transparency. This information may become publicly available.
- 9.7 We cannot control all use of your information by third parties. Where your personal information has been shared with another data controller entity, you will have rights over how that third party handles your

personal information and you can and should contact those parties directly if you want to exercise your rights in relation to those third party's uses of your personal information.

9.8 We share your personal information with the following categories of individuals or organisations:

9.8.1 members and/ or employees of our Group that require personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel;

9.8.2 our legal and other professional advisors and auditors;

9.8.3 governmental and regulatory bodies such as tax authorities, financial regulators / ombudsmen, and non-financial regulators (depending on the circumstances of the sharing);

9.8.4 tax authorities who are overseas for instance if you are subject to tax in a different jurisdiction, we may share your personal information directly with relevant tax authorities (instead of through the local authority);

9.8.5 other organisations and businesses who provide services to us under contract such as agents that recover money owed to us, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions, agents and sub-contractors who administer or process information on our behalf (such as a banking partners, transfer agents, registrar, paying agent, representative, facilities agent, auditor, depository, custodian, investment manager, sub-investment manager and global distributor (if relevant));

9.8.6 buyers or successor managers of a fund and their professional representatives as part of any restructuring or sale of our business or assets;

9.8.7 identity verification agencies (see below for more information);

9.8.8 market research organisations who help us to develop and improve our products and services;

9.8.9 anyone we transfer our rights and duties to – e.g., if we restructure or sell our business; and / or

9.8.10 if required by a subpoena or court order, to comply with any law, to protect the safety of any individual or the public and to prevent violation of our customer relationship terms.

9.9 Where we transfer your personal information outside your geographical location to another country, it will only be once your prior written consent has been obtained and safeguards that we will use to protect your personal information include contractual obligations imposed on the recipients of your personal information are in place. Those obligations require the recipient to protect your personal information to the highest standard of data privacy laws. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for personal information.

10. SECURITY SAFEGUARDS OF PERSONAL INFORMATION

- 10.1. The Group has implemented various security measures to protect personal information, including:
 - 10.1.1 Password protection and access control mechanisms.
 - 10.1.2 Secure storage and encryption of electronic data.
 - 10.1.3 Restriction of access to personal information on a need-to-know basis.
 - 10.1.4 Regular audits to ensure compliance with this Policy.

- 10.2 We implement appropriate technical and organizational measures which seek to ensure that personal data is appropriately protected against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access. Personal data must not be retained for longer than is necessary for the lawful purposes for which it is processed. To achieve this, each category of personal data processed by or on behalf of the Company shall be subject to a retention period which can be justified by reference to those lawful grounds. Retention periods shall be monitored and upon their expiry, the relevant personal data must be deleted or anonymized, so that it is no longer possible to identify the Data Subject to whom the personal data relates.

- 10.3 Personal data must be disposed of securely in a way that protects the rights and privacy of Data Subjects and ensures the permanent erasure of the data. This includes shredding, disposal of confidential waste and secure electronic deletion.

- 10.4 If something should happen, we have taken steps to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information and inform you how you can help minimise the impact. We take every reasonable step to protect your personal information, but we cannot guarantee the security of any information you transmit to us electronically and you do so at your own risk. We will deal with any breaches of personal information in line with our Incident Management Policy.

11. YOUR RIGHTS (DATA SUBJECT' RIGHTS)

- 11.1 You have a number of rights over your personal information including a right to object to the processing of your information. You will not, however, be able to use these rights in all circumstances.

- 11.2 You are also entitled to make a complaint to the regulator.

- 11.3 Under data protection law you have a number of rights. These rights are not without limitation and may not be available. Where applicable, you have the right to:
 - 11.3.1 be informed about our processing of your personal information;
 - 11.3.2 have inaccurate / incomplete personal information corrected / completed;

- 11.3.3 object to the processing of your personal information;
- 11.3.4 restrict the processing of your personal information;
- 11.3.5 have your personal information erased;
- 11.3.6 request access to your personal information and to obtain information about how we process it;
- 11.3.7 move, copy, or transfer your personal information digitally;
- 11.3.8 object to automated decision making, such as profiling; and / or
- 11.3.9 to be notified that your personal information has been accessed or acquired by an unauthorised person e.g., where a hacker may have compromised our computer system;

11.4 To exercise your rights as set out above, please write to us using the details provided. There is no fee for making these requests. However, if your request is excessive or unfounded, we can charge a reasonable fee or refuse to comply with it.

11.5 You also have the right to lodge a complaint with your local data protection regulator if you think that we have infringed upon any of your rights. Information about your local data protection regulator is set out below.

11.6 Pursuant to applicable law, you will not be discriminated against for exercising certain of your rights as set out above.

12. OUR WEBSITE

The content of this Policy is likely to change over time. We will always have the latest version available on our website. (For more information on the cookies used by Premier, please refer to us Cookie Policy.)

13. FUTURE CHANGES TO THIS PRIVACY POLICY

13.1 We reserve the right to update this Privacy Policy at any time, and we may notify you when we make any material updates. We will also notify you in other ways from time to time about the processing of your personal information, for example if you take out a new product with us.

13.2 If you do not agree with the changes, then you must stop using the website or applications and our products or services. If you continue to use the website, applications or our products or services following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

14. COMPLAINTS REGARDING THE PROTECTION OF PERSONAL INFORMATION

- 14.1 If you believe that we have not processed your personal information in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”), or that any of your rights under POPIA have been infringed, you have the right to lodge a complaint with us.
- 14.2 Internal Complaint Resolution Process to ensure a fair and efficient resolution of your complaint, please follow these steps:
- 14.2.1 Complete the POPIA Complaint Form (Annexure A) with details of your complaint, including:
- a) Your contact details
 - b) A description of the alleged breach of your rights
 - c) Any supporting documents
- 14.2.2 Submit the completed form to our Information Officer via:
Email: info@honeyinvestments.co.za (C/O – the Information Officer and the Compliance Officer)
- 14.2.3 The Information Officer will acknowledge receipt of your complaint within 7 (seven) business days.
- 14.2.4 We will investigate the complaint and provide you with a written response within 30 (thirty) days.
- 14.2.5 If you are not satisfied with our response, you may escalate your complaint to the Information Regulator of South Africa.
- 14.3. Complaint to the Information Regulator
- If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with the Information Regulator at:

Physical Address:	Postal Address:
JD House, 27 Stiemens Street Braamfontein Johannesburg 2001	P.O Box 31533 Braamfontein Johannesburg 2017
Complaints email:	POPIAComplaints@info regulator.org.za
General enquiries email:	enquiries@info regulator.org.za
Website:	https://info regulator.org.za/contact-us/

15. DOCUMENT REVISION AND APPROVALS

Detailed below is a list of Policy versions and the changes/amendments/additions/ adoptions made to the Policy with each updated version:

DATE	VERSION	CHANGES
January 2022	1.0	Notice established.
20 December 2022	1.0	The Premier Financial Engineering and Premier Investments Distribution Boards adopted the Policy.
August 2024	2.0	The naming convention of the Notice changed to Policy and legislative updates have been made.
31 October 2024	2.0	Board of Prime Financial Engineering approved policy (Resolution 5 of 2025) Board of Premier Product Solutions approved policy (Resolution 6 of 2025) Board of Premier Benefits approved policy (Resolution 6 of 2025) Board of Protected Nominees approved policy (Resolution 6 of 2025)
5 February 2025	3.0	Total revision of the policy to make two separate policies -the POPIA policy for internal use (processes and procedures) and the other to serve as a Privacy Notice to clients /customers. A further amendment was to capture the incident management in this policy rather than in a separate Incident Management policy and to include the associated Retirement Funds (Group Sponsored)
3 April 2025	3.0	PFE Board Approved and Adopted the Amended Policy Honey Board Approved and Adopted the Amended Policy PN Board Approved and Adopted the Amended Policy PB Board Approved and Adopted the Amended Policy Premier Retirement Annuity Fund Approved and Adopted the Amended Policy Premier Preservation Fund Approved and Adopted the Amended Policy Prime Pension Fund Approved and Adopted the Amended Policy Prime Provident Fund Approved and Adopted the Amended Policy
1 July 2025	3.1	Administrative updates applied by Cyd Isdale: Updates include the revised registered name of Premier Product Solutions (PPS) now known as Honey Investment Solutions, revised registered names of the Premier retirement funds now known as the Honey retirement funds, incorporation of the new company logo, and amendments to email addresses to reflect the updated company identity. These changes are administrative in nature and do not affect the substance or intent of the policy.

POPIA COMPLAINT FORM

1. Complainant Details

- Full Name: _____
- Contact Number: _____
- Email Address: _____
- Address: _____

2. Details of the Complaint

- Describe the nature of the alleged breach of your personal information rights:

- Date the alleged breach occurred: _____
- Supporting Documents Attached: [] Yes [] No

3. Desired Resolution

- How would you like us to resolve your complaint?

4. Declaration

I confirm that the information provided in this form is accurate and true to the best of my knowledge.

Signature: _____

Date: _____