

POPI POLICY

PYXIS INVESTMENT MANAGEMENT (PTY) LTD

An authorised Financial Services Provider FSP No: 662



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1. INTRODUCTION

1.1 Pyxis Investment Management (Pty) Ltd (hereafter referred to as “Pyxis Investment Management”) is a Category I and II Financial Services Provider providing advice and intermediary services in terms of the FAIS Act to clients in terms of the following sub-categories:

Category Description	Advice Automated	Advice Non-automated	Intermediary Scripted	Intermediary Other
CATEGORY I				
Long-Term Insurance subcategory B1		X		X
Long-term insurance subcategory B2		X		X
Long-term Insurance subcategory B2-A		X		X
Long-term Insurance subcategory B1-A		X		X
Structured Deposits		X		X
Participatory interest in a hedge fund		X		X
Long-Term Insurance subcategory C		X		X
Retail Pension Benefits		X		X
Pension Funds Benefits		X		X
Shares		X		X
Participatory interests in a collective investment scheme		X		X
Short-term Deposits		X		X
CATEGORY II - Discretionary FSP				
Long-term Insurance subcategory B1				X
Long-Term Insurance : Category B2-A				X
Long-Term Insurance : Category B1-A				X
Structured Deposits				X
Securities and instruments				X
Participatory interest in a hedge fund				X
Long-term Insurance subcategory C				X
Retail Pension Benefits				X
Pension Funds Benefits				X
Shares				X
Money market instruments				X
Debentures and securitised debt				X
Bonds				X
Derivative instruments				X
Participatory interests in one or more collective investment schemes				X
Long-term Deposits				X
Short-term Deposits				X
Long-term insurance subcategory B2				X

1.2 POPI requires Pyxis Investment Management to inform their clients as to how their personal information is used, disclosed and destroyed.

1.3 Pyxis Investment Management is committed to protecting the privacy of their clients and ensuring that the personal information of clients is used appropriately, transparently, securely and in accordance with all applicable legislation.



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2. THE PERSONAL INFORMATION COLLECTED

2.1 Pyxis Investment Management collects and processes a client's personal information in order to determine a client's needs. The type of information collected will depend on the need for which it is collected and it will only be used for that purpose. Wherever possible the client will be informed of the information required. This information will include but not be limited to

- Personal details such as name, address, identity number, marital status
- Description of residence, assets and business
- Description of assets and liabilities
- Details of existing insurance cover and investments
- Ownership certificates
- Any other information requested by an insurer to provide the client with an accurate analysis of their financial needs.

2.2 Pyxis Investment Management will also collect and process information for marketing purposes to ensure that products and services remain applicable to clients.

2.3 We have agreements in place with all our product suppliers and third party service providers to ensure that there is a mutual understanding with regard to the protection of a client's personal information.

3. HOW PERSONAL INFORMATION IS USED

- Providing products or services to clients and to carry out transactions requested
- For underwriting purposes
- Assessing and processing claims
- Conducting credit reference searches or verification
- Confirming, verifying and updating clients details
- Obtaining claims history
- Detection and prevention of fraud, crime, money laundering or other malpractice.
- Conducting market or customer satisfaction research
- For audit and record keeping purposes
- In connection with legal proceedings
- Providing our services to clients to carry out the services requested
- In connection with and to comply with legislative and regulatory requirements.



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3.2 In order to process a client's personal information, Pyxis Investment Management confirms that the following information will be met:

- 3.2.1 The client has consented to the processing of the information in writing.
- 3.2.2 The processing is necessary to conduct an accurate analysis of the client's needs.
- 3.2.3 Processing complies with the obligation set out in the FAIS Act to conduct a needs analysis and obtain information from a client in order to provide the client with the most appropriate product for their needs.
- 3.2.4 Processing of the information will protect a legitimate interest of the client, to receive a full and proper needs analysis.
- 3.2.5 Processing is necessary to pursue the legitimate interests of Pyxis Investment Management or a third party to whom the information is supplied to ensure that the most appropriate product is recommended to the client.

4. *DISCLOSURE OF PERSONAL INFORMATION*

- 4.1 We may disclose clients' personal information to our providers whose services or products clients elect to use. We have agreements in place to ensure that the providers comply with confidentiality and privacy conditions.
- 4.2 We may also disclose clients' information where we have a duty or a right to disclose in terms of applicable legislation or where it may be necessary to protect our rights.

5. *SAFEGUARDING CLIENT INFORMATION*

- 5.1 It is a requirement of POPI to adequately protect the personal information we hold and to avoid unauthorised access to and use of your personal information. We will continuously review our security controls and processes to ensure your personal information is secure.
- 5.2 The following processes are in place at Pyxis Investment Management:
 - 5.2.1 An Information Officer has been appointed who is responsible for ensuring compliance with the POPI Act.
 - 5.2.2 Training of staff with regards to the POPI policy takes place annually.
 - 5.2.3 Confidentiality clauses form part of our employment contracts.
 - 5.2.4 Client information is stored in our offices.
 - 5.2.5 All electronic files are backed up by an authorised IT provider with whom we have an agreement which includes a confidentiality clause.
 - 5.2.6 Consent to process client information is obtained from clients.



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6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

6.1 Clients have the right to access the personal information which we hold about them. Clients also have the right to ask us to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, we may no longer process information for that client.

6.2 The details of our Information Officer and office are as follows:

INFORMATION OFFICER:

NAME: Mr BJ Van Wyk

TELEPHONE NUMBER: 082 336 4523

PHYSICAL ADDRESS: 33 Medborn Crescent, Midstream Estate,
Midrand, 1692

E-MAIL ADDRESS: benjamin.vanwyk@pyxis-im.com



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