

Your Privacy is of the utmost importance to us

At Silvertree, we want to make your experience using our services satisfying and safe. We comply with South African data protection legislation- the Protection of Personal Information Act (POPIA) and where applicable, the EU GDPR legislation. As such, we have strict security procedures in place in respect of both the storage and the disclosure of any information that you have provided to us.

Please note, Silvertree never shares any information about specific individuals with any external third party unless required to do so by law, in compliance with our regulatory obligations or in cases where a data protection agreement has been put in place with a third-party supplier who has the necessary level of protection for the data. For further information on disclosure of information and data processing, please refer to the full Silvertree Privacy Policy on our website: www.silvertreegroup.co.za.

Given that we gather certain types of information about you, we feel you should fully understand our policy and the terms and conditions surrounding the capture and use of that information. This statement discloses what information we gather and how we use it. Our Information Officer is Robyn Woodward who is contactable on 021 702-1915 or via email on robyn@silvertreegroup.co.za. We have registered our Information Officer with the Information Regulator. We are a deemed Responsible Party under the POPIA Act and operate under registration number 2006/226559/23.

Please read our detailed privacy policy to learn more about us as well as how we process your personal data. This privacy notice aims at providing in brief some information about why we collect, use and store your data.

We value your privacy and are committed to protecting your personal data. This summary gives you a snapshot of our privacy practices. Please read the full policy for more detailed information.

User Consent

By using our services, you consent to the collection, use, and sharing of your personal data as described in this privacy policy. We will always seek your explicit consent for any use of your data that is not covered by this policy.

Data Subject Rights

You have the right to access, correct, delete, or transfer your personal data, as well as the right to object to certain processing and the right to withdraw consent for processing where consent is the basis for processing.

Data Minimization

We only collect the data that is necessary for the purposes outlined in this policy and do not store it longer than needed.

Security Measures:

We implement robust security measures to protect your data, including encryption, access controls, and regular security audits.

Notification of Data Breaches

In the unlikely event of a data breach, we will notify you and any applicable regulator where we are legally required to do so.

Third-Party Processors

Our third-party processors are carefully selected and required to use your data in accordance with our instructions, this privacy policy, and any other relevant confidentiality and security measures.

International Data Transfers

When we transfer your data internationally, we ensure equivalent levels of protection are afforded to it by ensuring at least one of the following safeguards is implemented: only utilize registered financial institutions with head offices in SA and similar data protocol in place.

Updates to the Privacy Policy

We may update this policy from time to time. We will notify you of any significant changes and post the updated policy on our website.

Contact Details for Privacy Concerns

If you have any concerns or questions about your privacy, please contact our Information Officer directly at 021 702-1915 or via email: robyn@silvertreegroup.co.za.

Cookie Policy

Our website uses cookies to improve your experience. Please refer to our Cookie Policy [\[Link\]](#) for more information.

Opt-Out Options

If you no longer wish to receive marketing communications from us, you can opt-out at any time by following the unsubscribe link in the email or contacting us directly.

Personal data that we collect

The type of personal data we process about you may be:

- Your personal contact details as well as demographic information such as your name, age, gender, nationality, email ID, telephone number etc. We may also collect details about your visits to our website for marketing stats and in order to improve our services.
- When you visit our website, we may collect your IP (internet protocol) address and information about your device, browser as well as your location.
- Where you fill out our web form/ application forms etc. to apply to be a client of Silvertree, we may also collect your financial information, financial services experience and other information required for account set up including but not limited to, your employment details, sources of funds, bank and credit card details etc.
- Silvertree may supplement the information with other information received from other companies and/or organizations such as the South African Revenue Services (SARS) in order to enable Silvertree to render suitable and proper services to you.
- We may also process your identification documents submitted at the time of registration to perform Know Your Customer checks as well as identity verifications. (If you visit our premises, we may have photos or videos recorded of you.)
- If you are a registered client or have used any of our services, we may process your email behaviour i.e., if and when you have read our emails and how. We may also process data you have shared on public websites or social media.

How we use personal information

We process your data in accordance with South African law as well as other applicable laws (for example GDPR where applicable). Across our business practices we ensure that your data is processed fairly and lawfully. Furthermore, we make sure that your data is processed for the purposes it was originally collect for, kept up to date, relevant and not excessive, not kept longer than necessary and kept secure by adopting best industry practices. We require your personal data for the following reasons

- For internal record keeping;
- To comply with legal obligations;
- To provide services as requested by you under the contract entered with you;
- We may use the information to improve our products and services;
- We may periodically send promotional emails about new services, special offers or other information which we think you may find interesting, using the email address which you have provided;
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email or phone;
- We may use the information to customise the website according to your interests; and
- To carry out other business activities in the Company's legitimate interest where your rights to privacy do not override our business interest such as for the purpose of direct marketing.

Sharing

We may share your information with third-party processors that are contracted to Silvertree for the provision of services such as: identity verification, fraud/ sanctions screening, digital agencies, hosting providers, liquidity providers and other technical partners, banks, online payment service providers, legal advisors, regulators, law enforcement agencies or other legal bodies for crime prevention or national security.

Your rights

As a Responsible Party we respect your right to privacy and all other rights as set forth in the data protection law. If we process data about you, you have the right to request or access information we hold about you. In order to access your information, you can (log into the 'Client Portal') or send us a request at mark@silvertreegroup.co.za. Silvertree will take all reasonable steps to confirm your identity before making changes to Information.

Where your data is shared with a third-party, we shall contact them for deletion unless this proves impossible or involves disproportionate effort.

Cross-border (if applicable)

Data may be transferred across borders to the countries with different level of protections. Data transfers outside SA may be for the purpose of administration or storage. Our database development and management teams are located in South Africa. In limited circumstances, we may share your data with staff located in subsidiary locations (if applicable) for administration purposes or in order to process your payments. Where transfers are made outside of SA, we ensure all adequacy measures are satisfied for the security of your personal information. Where reasonably possible, we may pseudonymise or minimise data for protection. In some circumstances, we may share your data with entities in our group and staff for administration purposes or in order to process your payments.

Data retention

Silvertree may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects. Information may be retained only to serve the purpose of collecting the Information and be deleted/destroyed once the purposes has been fulfilled, subject to other regulatory requirements where Information is to be kept for a specific prescribed period. We may be legally obliged to retain data for longer purposes such as 5 years past date of termination of agreement under Anti-Money Laundering regulations and FAIS regulations.

Data security

We do not share or sell your information other than as described in our policy. As a responsible FSP authorised and regulated by the FSCA, we ensure our business practices and data processing activities are in- compliance with the regulations and our data processing staff well- trained in processing your information. Furthermore, we have adopted sound technical and compliance procedures to avoid loss, destruction, unauthorised access or omission to your data. Our partners and third-party processors are all bound by strict data protection obligations through data processing contracts.

Complaints

If you have any queries with regards to how we handle your information, require access to your personal information or in case you have complaints, please write to our Information Security Team at robyn@silvertreegroup.co.za.

Details for regulator

The information Regulator (South Africa)	
Hoofd Street, Forum III, 3 rd floor Braampark	Mr Marks Thibela - Chief Executive Officer
P.O. Box 31533, Braamfontein, Johannesburg, 2017	Tel No. +27 (0) 10 023 5200, Cell No. +27 (0) 82 746 4173
General enquiries email: infoereg@justice.gov.za	Complaints email: complaints.IR@justice.gov.za

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