

PRIVACY POLICY

FSP Business Four Point 0 (Pty) Ltd

Registration Number: 2025/968743/07

Last updated: February 2026

1. Introduction

FSP Business Four Point 0 (Pty) Ltd (“FSP Business 4.0”, “we”, “us”, or “our”) is committed to protecting the privacy, confidentiality, and security of personal information entrusted to us.

This Privacy Policy explains how we collect, use, disclose, store, and protect personal information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Promotion of Access to Information Act 2 of 2000 (“PAIA”), the Financial Advisory and Intermediary Services Act 37 of 2002 (“FAIS”), the Financial Intelligence Centre Act 38 of 2001 (“FICA”), the Financial Sector Regulation Act 9 of 2017, the Conduct of Financial Institutions Bill (“COFI”) (when enacted), and other applicable laws.

This policy applies to:

- Visitors to our website
- Clients and prospective clients (including FSPs, financial advisers, and principals)
- Business partners and service providers
- Participants in assessments, diagnostics, events, research, and digital tools
- Any person whose personal information we process

2. Section 18 Notification Statement

In terms of section 18 of POPIA, we are required to notify you when we collect your personal information. This Privacy Policy serves as our section 18 notification. When we collect your personal information, please take note of the following:

- The information being collected and, where the information is not collected directly from you, the source from which it is collected
- Our name and address as the responsible party (see Section 16 below)
- The purpose for which the information is being collected (see Section 5 below)
- Whether the supply of the information is voluntary or mandatory, and the consequences of failure to provide the information
- Any particular law authorising or requiring the collection of the information
- Whether we intend to transfer the information to another country or international organisation, and the level of protection afforded by that country or organisation (see Section 8 below)
- Your right to object to the processing of your personal information in terms of section 11(3) of POPIA
- Your right to lodge a complaint with the Information Regulator (see Section 16 below for contact details)

Where the supply of personal information is voluntary, failure to provide the requested information may limit our ability to deliver certain services or respond to your enquiries. Where the supply is required by law (for example, under FICA or FAIS), failure to provide the information may result in our inability to provide services or comply with regulatory obligations.

3. Who We Are

FSP Business Four Point 0 (Pty) Ltd provides business strategy, practice management, technology enablement, diagnostics, education, and advisory support to financial services providers and related professionals.

We act as a Responsible Party (as defined in POPIA) when processing personal information.

4. Personal Information We Collect

We collect personal information directly from data subjects unless an exception under section 12 of POPIA applies. Where we collect personal information from a source other than the data subject, we will inform the data subject of the source, unless to do so would be impossible or involve disproportionate effort.

We may collect and process the following categories of personal information:

4.1 Information You Provide Directly

- Full name and surname
- Contact details (email address, telephone number, business address)
- Company and role information
- Registration, licence, or professional details (including FSP licence numbers)
- Responses to assessments, surveys, diagnostics, or questionnaires
- Communications sent to us (emails, forms, feedback, enquiries)

4.2 Information Collected Automatically

When you visit our website or use our digital tools, we may collect:

- IP address
- Browser type and device information
- Pages visited and usage patterns
- Cookies and similar tracking technologies (see Section 12)

4.3 Information from Third Parties

Where lawful and appropriate and subject to section 12 of POPIA, we may receive information from:

- Business partners or referral partners
- Technology and platform providers
- Publicly available sources

Where information is collected from third-party sources, we will take reasonable steps to inform you of the collection and the source thereof, unless doing so would be impossible, involve disproportionate effort, or would prejudice a lawful purpose for the collection.

5. Special Personal Information

POPIA defines “special personal information” as information relating to a data subject’s religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour.

FSP Business 4.0 does not collect, process, or store special personal information as defined in sections 26 to 33 of POPIA. Our services do not require us to process information relating to race, health, criminal behaviour, biometric data, or any other category of special personal information.

In the unlikely event that special personal information is inadvertently provided to us, we will take reasonable steps to notify the data subject, delete or de-identify such information, and ensure that it is not further processed.

6. Purpose of Processing Personal Information

We process personal information only for lawful, specific, and legitimate purposes, including to:

- Provide our services, tools, assessments, and insights
- Manage client and stakeholder relationships
- Respond to enquiries and support requests
- Improve our products, services, and digital platforms
- Conduct research, benchmarking, and analytics (in aggregated or anonymised form)
- Communicate updates, insights, and educational content
- Meet legal, regulatory, and contractual obligations (including under FAIS, FICA, and the Financial Sector Regulation Act)

We do not sell personal information to third parties.

7. Lawful Basis for Processing

We process personal information on one or more of the following lawful bases as set out in section 11 of POPIA:

- Your consent
- Performance of a contract or steps prior to entering a contract
- Compliance with a legal obligation
- Protection of a legitimate interest of the data subject
- Our legitimate interests, where these do not override your rights
- The proper performance of a public law duty

8. Disclosure of Personal Information

We may share personal information with:

- Employees and authorised representatives
- Professional advisers (legal, compliance, accounting)
- Technology, hosting, and analytics service providers
- Regulators or authorities, where required by law

All third parties are required to maintain appropriate confidentiality and security safeguards.

9. Operator Agreements (Section 21 of POPIA)

Where we engage third-party service providers (“operators” as defined in POPIA) to process personal information on our behalf, we ensure compliance with sections 20 and 21 of POPIA by:

- Concluding written agreements (operator agreements or data processing agreements) with all operators
- Requiring operators to establish and maintain the security measures referred to in section 19 of POPIA
- Requiring operators to process personal information only in accordance with our instructions and for the purposes specified
- Requiring operators to treat all personal information as confidential
- Requiring operators to notify us immediately of any security compromise or unauthorised access to personal information
- Conducting due diligence on operators prior to engagement and on an ongoing basis

9.1 Third-Party Operators

The following categories of third-party operators may process personal information on our behalf. A detailed register of operators and due diligence records is maintained by our Information Officer:

Operator Category	Purpose	Safeguards
Xero (cloud accounting)	Invoicing, billing, and financial record-keeping	Operator agreement in place; data hosted in compliance with applicable data protection standards
Cloud hosting and infrastructure providers	Hosting of digital platforms, data storage	Operator agreements; encryption; access controls; data residency provisions
Email and communications platforms	Client communications, newsletters, updates	Operator agreements; secure transmission protocols
Analytics and assessment tool providers	Business diagnostics, benchmarking, data analytics	Operator agreements; data anonymisation where practicable
Professional advisers (legal, compliance, accounting)	Advisory services, compliance support	Professional duty of confidentiality; operator agreements where applicable

Note: A complete and current register of operators is maintained by the Information Officer and is available on request.

10. Cross-Border Data Transfers

Where personal information is processed or stored outside the Republic of South Africa, we ensure compliance with section 72 of POPIA by confirming that:

- The recipient country provides an adequate level of protection that is substantially similar to the conditions for lawful processing under POPIA; or
- The data subject has consented to the transfer; or
- The transfer is necessary for the performance of a contract between the data subject and the responsible party; or

- The transfer is for the benefit of the data subject and it is not reasonably practicable to obtain the data subject's consent; or
- Binding corporate rules or contractual agreements providing an adequate level of protection are in place

Specifically, our digital platforms and certain operator services may involve the processing or storage of personal information in jurisdictions outside South Africa, including but not limited to countries within the European Union and other jurisdictions where our cloud service providers maintain data centres. In all cases, we ensure that appropriate technical and contractual safeguards (including data processing agreements with operators) are in place to protect personal information in accordance with POPIA.

11. Information Security

We take reasonable technical and organisational measures, as contemplated in section 19 of POPIA, to protect personal information against:

- Unauthorised access
- Loss, damage, or destruction
- Unlawful processing

Security measures include access controls, encryption where appropriate, secure hosting environments, internal governance policies, and regular review of security practices.

12. Data Breach Notification

In the event that there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, we will, in compliance with section 22 of POPIA:

- Notify the Information Regulator as soon as reasonably possible
- Notify the affected data subject(s) as soon as reasonably possible, unless the identity of the data subject cannot be established
- Provide sufficient information to allow the data subject to take protective measures, including a description of the possible consequences of the breach, the measures taken or proposed to be taken to address the breach, and a recommendation of measures to be taken by the data subject to mitigate the possible adverse effects

Notification may be delayed only if a public body responsible for the prevention, detection, or investigation of offences so requests.

13. Data Retention

We retain personal information only for as long as:

- It is necessary for the purpose for which it was collected
- Required by law or regulation (including FAIS, FICA, and tax legislation)

When information is no longer required, it is securely deleted, de-identified, or destroyed in accordance with section 14 of POPIA. We maintain a data retention schedule and have implemented procedures to ensure the routine review and, where appropriate, secure disposal of personal information that is no longer necessary. Records of the deletion or destruction of personal information are maintained for audit purposes.

14. Your Rights as a Data Subject

In terms of POPIA, you have the right to:

- Request access to your personal information (section 23)
- Request correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, or misleading information, or information that was obtained unlawfully (section 24)
- Object to the processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing (section 11(3))
- Object to the processing of your personal information for purposes of direct marketing by means of unsolicited electronic communications (section 69)
- Withdraw consent (where processing is based on consent)
- Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you (section 71)
- Lodge a complaint with the Information Regulator

Requests can be submitted to the Information Officer using the contact details in Section 16 below or by completing the complaints form attached as Annexure A to this policy.

15. Direct Marketing

We will only use your personal information for direct marketing purposes by means of electronic communications (including email, SMS, or similar channels) where:

- You have given your prior consent (opt-in) to receive such communications; or
- You are an existing client and the marketing relates to similar products or services, and you were given a reasonable opportunity to object (opt-out) at the time of collection and with every subsequent communication

You have the right to opt out of receiving direct marketing communications at any time. Every electronic marketing communication we send will include a clear and easy mechanism to unsubscribe or opt out. To opt out, you may also contact us using the details in Section 16.

16. Cookies and Website Tracking

Our website may use cookies and similar technologies to:

- Improve functionality and user experience
- Analyse website traffic and usage trends
- Remember your preferences and settings

You can manage or disable cookies through your browser settings. Disabling cookies may affect website functionality.

17. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of those sites and encourage you to review their privacy policies.

18. PAIA Requests

Requests for access to information in terms of PAIA must be submitted in accordance with our PAIA Manual, available on our website or on request from the Information Officer.

19. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The latest version will always be published on our website, and continued use of our services constitutes acceptance of the updated policy. Where material changes are made, we will take reasonable steps to notify affected data subjects.

20. Information Officer and Contact Details

20.1 Information Officer

Name: Anton Swanepoel

Email: anton@fsp40.co.za

Contact Number: 082 453 4184

20.2 Deputy Information Officer

Name: Marius Vermeulen

Email: marius@fsp40.co.za

20.3 General Contact

FSP Business Four Point 0 (Pty) Ltd

Registration Number: 2025/968743/07

Physical Address: Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081

Postal Address: Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081

Email: info@fsp40.co.za

Website: www.fsp40.co.za

20.4 Information Regulator of South Africa

If you are not satisfied with our response, you may lodge a complaint with the Information Regulator of South Africa:

- Physical Address: JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001
- Website: www.inforegulator.org.za
- POPIA Complaints: POPIAComplaints@inforegulator.org.za
- PAIA Complaints: PAIAComplaints@inforegulator.org.za
- General Enquiries: enquiries@inforegulator.org.za

ANNEXURE A

COMPLAINTS FORM – PROCESSING OF PERSONAL INFORMATION

If you believe that FSP Business Four Point 0 (Pty) Ltd has processed your personal information in a manner that is not in accordance with POPIA, you may lodge a complaint using this form.

Please complete and submit this form to the Information Officer at:
privacy@fspbusiness.co.za

DETAILS OF COMPLAINANT

Full Names: _____

Identity Number: _____

Contact Details (Email / Phone): _____

Postal Address: _____

NATURE OF COMPLAINT

Please describe the nature of your complaint, including the personal information concerned and the manner in which you believe it has been improperly processed:

RELIEF SOUGHT

Please describe what action you would like FSP Business 4.0 to take:

SUPPORTING DOCUMENTS

Please attach proof of identity and any supporting documentation.

Signed at _____ this _____ day of _____ 20____

Signature of Complainant

Note: If you are not satisfied with our response, you may lodge a complaint with the Information Regulator of South Africa at POPIAComplaints@inforegulator.org.za.