

Privacy Notice

The Harvard House Group companies, including Harvard House Group Management Trust, Harvard House Investment Management (Pty) Ltd., Harvard House Insurance Brokers (Pty) Ltd., Harvard House Chartered Accountants, and Harvard House Financial Services Trust (hereafter Harvard House/Harvard House Group) are committed to the Confidentiality, Integrity, and Availability (CIA) of Personal Information. This notice explains how each entity within the Harvard House Group obtains, uses, and discloses personal information, in accordance with the requirements of the Protection of Personal Information Act (PoPIA).

All mention of the word "you(r)" in this document is in reference to:

An existing/prospective Harvard House client, an existing/prospective employee, a third party providing a service to Harvard House, or a potential third party looking to provide a service Harvard House.

About The Harvard House Group

Responsible Party

This privacy notice is issued for the Harvard House Group our office location and contact details are as follows:

Physical Address: Harvard House, 3 Harvard Street, Howick, 3290, Kwazulu Natal, South Africa

Contact Number +27 33 330 2164

Email Addresses: admin@hhgoup.co.za for general enquiries,
robertp@hhgroup.co.za or doth@hhgroup.co.za for more information regarding this privacy policy and concerns relating to the processing of your personal information.

The personal information we collect and process

We may collect, use, store, retain or transfer different categories of personal information about you. Below you will find the categories of personal information that we process.

- **General Information**
This includes your title, first names, last name, marital status, date of birth, South African Identity Number or similar identifier and gender. For companies, this includes any personal information from the registration documents.
- **Contact Information**
This includes your billing address, postal address, email address, telephone/mobile numbers.
- **Financial Information**
This includes your bank account and payment details, debit order forms, information contained in VAT certificates/Tax clearance certificates, and bank statements for certain clients.
- **Transaction Information**
This includes the transaction history between you and us and other details of products and services you have signed up for.
- **Marketing and Communication Information**
This information includes how you prefer to receive communication from us, your preferences regarding receiving marketing information from us or our third parties. We also collect, use, and share aggregated information such as statistical data which does not directly or indirectly reveal your identity.

- **Technical Information**

This includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, products you viewed or searched for, page response times. More details can be found under our “Cookies Disclaimer” in the section below.

- **Profile Information**

For certain of our services, this may include information such as your username, password as well as any requests for support and feedback.

Not providing your personal information

In certain situations, the supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory. There are however instances where you may need your consent to process your personal information. Where you have given us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, nor will it affect the processing of your personal information where consent is not required. You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship.

Changes to your personal information

In accordance with the PoPIA, you have a right to correct any of your personal information held by the Harvard House Group. For more information about how to do this, please see section “Your Legal Rights” of this policy.

Opting out

You may ask us at any time to stop sending you marketing messages. You can do this through the unsubscribe button in our emails.

If you are an existing client, opting out of marketing messages only ensures that you will no longer receive marketing from us. This means that your personal information will still be processed for the purpose of providing you with the product support or services you have signed up for.

Third-Party Links

Our website may contain links to other third-party websites. By clicking on those links, you may be allowing those third parties to collect information about you. We do not control these third-party websites, and we recommend that you read their privacy statements as well as those of any other website before continuing to browse them.

When we collect your information

Harvard House uses different methods to collect personal information from and about you. These methods include:

- **Direct Interactions:**

You may share your personal information, such as your identity, contact details, and financial data by completing certain forms and/or when corresponding with us by email or phone. This includes personal information that you provide when you:

- Make enquiries through our website regarding our products or services,
- Subscribe to our publications/newsletters,
- Provide us with feedback on our products and services,
- Request or update your marketing communications and preferences,

- **Cookies Disclaimer**

We may automatically collect data about you by using cookies.

Cookies are small text files that web browsers store on user devices (smartphones, computers, tablets) that allow websites to, among other things, remember your device, preferences, and previous interactions with the website(s).

Below you will find the categories of cookies that we use and how we use them:

- **Essential:** These cookies ensure the proper function of our website, such as maintaining sessions and preventing security threats. They do not collect or store any of your personal information.
- **Functional:** These cookies ensure that we are able embed content to our website and share content to our social media platforms.
- **Statistical:** These cookies store the number of visits the page has received and which pages of the website have been visited
- **Preference:** These cookies help us remember your settings and browsing preferences (e.g., language choice), they enable us to ensure that you have a better and more efficient experience on future visits to our website.
- **Marketing:** We may at times display marketing content relevant to our services, these cookies help us keep track of the efficiency and relevancy of these marketing campaigns. The information stored in these cookies may also be used by our partners to show similar marketing content on other websites.

- **Third Parties or Social Media**

We may, at times, receive your personal information from third parties to whom you have given your consent to share your information with Harvard House. These third parties may include individuals or entities whose business activities align with those of the Harvard House Group.

Additionally, we may collect your information when you interact with us on our social media platforms, such as Facebook, Instagram, LinkedIn, X (formerly Twitter), and YouTube.

How we use your personal information

We will only use your personal information for the purpose for which it was collected.

Typically, we will use your personal information:

- Where you have agreed to the processing of your personal information,
- In compliance to a legal or regulatory obligation,
- Where it is required for our legitimate interests, including those of our third parties,
- To perform/fulfil the contract we have or are in the process of entering into with you,
- To register you as new customer,
- To manage our relationship with you,
- To provide you with product/service support and to communicate any updates to our products/services,
- To use data analytics to improve our website, products, marketing, client relationships and experiences (refer to the “Cookies Disclaimer” in the section above),
- To provide you with relevant marketing material:
(Unless you have previously unsubscribed)
 - We will only send you marketing if you have purchased our products/services, or
 - When you have given us your consent by expressing an interest in our products/services either by email, submission of your contact details through our website or social media platforms.
 - You may opt out of these communications at any time by selecting the “unsubscribe” button at the bottom of the email.

Security of your personal information

We are committed to your privacy and safeguarding information that you share with us. We commit to ensuring that appropriate security measures are in place to protect your personal information from accidental loss, damage, disclosure, unauthorised access, use and/or alteration.

We have implemented an Information Security Management System that aligns to the industry best practice guidelines. The implemented security controls are subject to regular reviews to ensure applicability, relevance, and efficacy.

In addition to this, access to your personal information is limited to our employees, agents, contractors and third party service providers who are required to have access to perform their duties. Your personal information is only processed upon our instruction and all authorised individuals are subject to strict non-disclosure and privacy agreements.

Though we have implemented reasonable security measures, we have also put in place procedures to deal with any suspected security compromises. Should we identify a breach, we will notify you and the Information Regulator as the law requires.

Third Parties to whom we may share your personal information

We may at times have to share your personal information with certain third parties or make use of certain third parties in the course of collecting/processing your personal information for the purposes referenced in the previous section. Some of these third parties are mentioned below.

- **Internal Parties**

This includes members of our staff who are involved in the fulfilment of any contracts that we have with you:

- For New/Existing Clients: this includes but is not limited to the members of our staff who are responsible for providing you with product/service support and communicating any updates to our products/services,
- For New/Existing Employees: this includes but is not limited to the members of staff who are responsible for updating our staff records and company payroll.

- **External Parties**

We use third party service providers to assist us with various activities pursuant to our business operations and legal/industry related obligations.

- Third party product providers that enable the delivery of our services to you,
- Third parties who provide us with workplace technology such as hosting, storage, and communications. Please contact us should you want to receive a full list of the third party service providers who may process your personal information while assisting us with those activities,
- Professional advisers including lawyers, bankers, auditors, insurers, firms that provide risk management consultancy and accounting services,
- Regulatory bodies such as the Financial Sector Conduct Authority (FSCA), Financial Intelligence Centre (FIC), and South African Reserve Bank (SARB) to whom we are obligated to report to in certain circumstances,
- Third parties to whom we choose to sell, transfer, or merge parts of our business with.

We require all our third parties to respect the privacy and security of your personal information and treat it in accordance with the law.

We do not permit our third parties to use your personal information for their own purposes. We have strict contracts in place that only permit the processing of your information for the specified purposes.

- **International Transfer of Personal Information**

International transfer of your personal information is only done in situations where trans-border processing is required (stakeholders and/or operators situated across the border, who require access to your personal information pursuant to Harvard House's business operations). We will not send your information to a country that does not have information protection legislation similar to that of South Africa, unless we have ensured, through binding contracts and service agreements, that the recipient agrees to effectively adhere to the principles for processing of information in accordance with the PoPIA.

Your legal rights

The Protection of Personal Information Act, 2013 provides you with rights in relation to your personal information. To exercise these rights, you can submit your requests using the contact information provided in the "About Us" section. Your rights include, but are not limited to:

- The right to confirm whether we hold any of your personal information and to request access to it,
- The right to object, on reasonable grounds relating to your particular situation to the processing of your personal information,
- The right to request, where applicable, the correction, destruction, or deletion of your personal information,
- The right to object, at any time, to the processing of your personal information for the purpose of direct marketing,
- Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information. You have the right, at any time, to make enquiries or lodge a complaint with the Information Regulator. Should you wish to lodge a complaint, you may do so by completing [Form 5](#) and submitting the completed form to the applicable email address noted in the below contact details for the Information Regulator:
 - **Physical Address:**
JD House, 27 Stiemans Street,
Braamfontein,
Johannesburg, 2017
 - **Postal Address:**
P.O Box 31533, Braamfontein
Johannesburg, 2017
 - **Website:**
<https://inforegulator.org.za/>
 - **Email Addresses:**
For complaints: popiacomplaints@infoRegulator.org.za
For general enquiries: enquiries@infoRegulator.org.za