	Policy:	FSP: 4221
	<b>PERSONAL INFORMATION RETENTION POLICY</b>	Policy Document no: PA4
		Revision no: 1.2021
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## 1. INTRODUCTION

Autus Fund Managers (the “Company”) is an authorised financial services provider whose business includes collecting personal information from its clients, suppliers, and employees. Accordingly, the Company should comply with all the relevant regulations relating to the protection of Personal Information.

This Personal Information Retention Policy (the “Policy”) documents the principles and procedures the Company follows for the required retention periods for specific categories of Personal Information and sets out the requirements when Personal Information is deleted or destroyed. The policy applies to the Company and its directly controlled subsidiaries and includes relations with third parties.

This policy applies to all Personal Information processed by the Company.

## 2. DOCUMENTS OF REFERENCE

- Protection of Personal Information Act, 2013 (Act no. 4 of 2013);
- European Union General Data Protection Regulation (“GDPR”);
- Promotion of Access to Information Act, 2000 (Act no.2 of 2000);
- Personal Information Protection Policy;
- Privacy Policy.

## 3. PRINCIPLES REGARDING PERSONAL INFORMATION RETENTION

### 3.1 Retention period

The Company deems the default retention period for Personal Information to be 5 (five) years without any documented information or requirement by specific regulation. The default retention period of 5 (five) years will commence at the date of the termination of the business relationship.

### 3.2 Protection of Personal Information during the retention period

The Company will ensure that retained Personal Information, stored in electronic format, is protected against unauthorised access or loss. All procedures and systems utilised in the electronic storage of Personal Information will be accessible, within a reasonable time, during the retention period. The responsibility for the storage and protection of Personal Information is that of the Information Officer.

### 3.3 Personal Information destruction


The Company will regularly review all its stored Personal Information to decide whether to destroy or delete any Personal Information. Personal Information deletion or destruction will only be applicable once the purpose for which the documents or electronic records were collected and stored is no longer applicable.

As provided in the Register of Personal Information Processing Activities, the Personal Information Retention Schedule will also describe how Personal Information is disposed of. The Company agrees that the destruction of Personal Information may be dealt with internally or externally but that the Company remains responsible for such destruction.

The Company will ensure that appropriate controls are in place to prevent the permanent loss of Personal Information due to unintentional, negligent or malicious actions.

### 3.4 Breach of the Personal Information Retention Policy

The Company will ensure that the necessary processes are in place to report a breach of this policy immediately. It is the responsibility of the Information Officer to investigate and action all instances of breaches.

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Non-compliance with this Policy by any employee of the Company will be dealt with in terms of the Company's disciplinary processes.

#### 4. PERSONAL INFORMATION DISPOSAL

##### 4.1 Routine destruction of Personal Information

The Company will routinely destroy the following Personal Information unless the Personal Information is subject to a legal proceeding or regulatory investigation:

- Documents such as application forms, letters and email messages;
- Address lists and distribution lists, and;
- Copies of documents, snapshot printouts or any extract from any Personal Information database of the Company.

##### 4.2 Destruction process

- The Information Officer will ensure that all documents retained by the Company are classified as either low- or high-risk documents.
- High-risk documents will contain information that is confidential and includes documents that contain Personal Information. These documents will be destroyed by way of shredding or electronic deletion.
- Low-risk documents do not contain any personal or proprietary information and include Company published documents. These documents will also be shredded and may be disposed of without an audit trail.

#### 5. DOCUMENT MANAGEMENT

This policy is valid as of 1 July 2021. The document owner is the Information Officer, who has the responsibility to update the document annually.

#### 6. INFORMATION OFFICER CONTACT DETAILS

Any questions relating to the Company's Privacy Policy or the treatment of an individual's Personal Information should be addressed to the Information Officer, whose contact details are:

##### INFORMATION OFFICER:

Name : Francois Roux  
Telephone number : 083 393 3551  
Postal address : PO Box 7025, Welgemoed, 7538  
Physical address : Unit D2, Polo Village Offices, Val de Vie Estate, Paarl, 7646  
Email address : francois@autus.co.za  
Website : www.autusfundmanagers.co.za