



STELLA AUREAM (PTY) LTD

POPIA AND DATA PROTECTION POLICY

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1. Introduction

Stella Auream (Pty) Ltd ("Stella Auream", "we", "our") is committed to safeguarding the privacy, confidentiality and security of all personal information under its control. This Policy sets out Stella Auream's approach to the lawful processing of personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").

This Policy must be read together with the Stella Auream FICA/AML Policy, which governs the processing of personal information required for Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), Know Your Client (KYC) procedures, statutory reporting, and the prevention of money laundering and terrorist financing.

Stella Auream processes personal information in a manner that respects individual rights while ensuring compliance with all legal and regulatory requirements.



2. Definitions

For purposes of this Policy:

Term / Abbreviation	Definition
POPIA – Protection of Personal Information Act	South African legislation governing the lawful processing and protection of personal information.
PAIA – Promotion of Access to Information Act	Legislation providing individuals with the right to request access to records held by public and private bodies.
Personal Information (PI)	Information relating to an identifiable natural or juristic person, including identity details, contact information, financial and biometric data, and online identifiers.
Special Personal Information	Sensitive categories of information requiring heightened protection under POPIA (such as race, religious beliefs, biometrics, or health information).
Processing	Any operation performed on personal information, including collection, storage, updating, use, dissemination, or deletion.
Responsible Party	Stella Auream, as the entity determining the purpose and means of processing personal information.
Operator	A third-party service provider that processes personal information on behalf of Stella Auream.
Information Officer (IO)	The individual appointed by Stella Auream to manage POPIA compliance and data-subject requests.
Deputy Information Officer (DIO)	A person appointed to support the Information Officer with POPIA and PAIA compliance functions.
Data Subject	Any natural or juristic person whose personal information is processed by Stella Auream.
Consent	A voluntary, specific and informed expression of will permitting the processing of personal information.
Security Safeguards	Technical, physical and organisational measures implemented to protect personal information against loss, unauthorised access, or unlawful processing.
Information Regulator	The statutory body established to oversee and enforce compliance with POPIA and PAIA.
Cross-Border Transfer	The movement of personal information outside South Africa in accordance with POPIA Section 72.
Cookie / Tracking Technology	A file or mechanism used to store or collect information relating to website usage; used only in accordance with POPIA and consent requirements.



3. Scope

This Policy applies to all personal information processed by Stella Auream relating to clients, prospective clients, suppliers, employees, contractors, website users, beneficial owners, authorised representatives and any third party interacting with the company.

The Policy applies to all forms of processing, whether electronic or manual, and to all business operations including sales, compliance, administration and digital platforms.

4. Lawful Basis for Processing

Stella Auream processes personal information on the following lawful grounds:

- a) **Legal obligation:** including but not limited to FICA, tax legislation and audit requirements.
- b) **Contractual necessity:** processing required for the initiation, performance or conclusion of a transaction.
- c) **Legitimate interest:** processing necessary to prevent fraud, ensure security, manage risk and conduct business operations.
- d) **Consent:** required only for optional activities such as marketing, website analytics and cookie-based tracking.

Where processing is required under FICA or other legislation, Stella Auream may process personal information without consent, as permitted by law.



5. Categories of Personal Information Processed

Stella Auream may process the following categories of personal information:

5.1 Identity and Contact Information

Names, identity numbers, passport details, nationality, date of birth, addresses, phone numbers and email addresses.

5.2 FICA and AML Information

Beneficial ownership information (5%+ threshold), PEP status, sanctions screening results, source of funds and wealth information, risk-rating assessments and verification documentation.

5.3 Transactional Information

Purchase and sale records, payment information, linked or structured transactions, cross-border transfer information and tax-related documentation.

5.4 Website and Device Information

IP addresses, cookies, online identifiers, browser and device details.

5.5 Compliance and Audit Information

Internal Suspicion Reports, audit trails, monitoring logs and other compliance records.



6. Purpose of Processing

Stella Auream processes personal information for the following purposes:

- To verify the identity of clients and comply with FICA obligations, including CDD and EDD.
- To fulfil contractual obligations and facilitate transactions.
- To prevent and detect fraud, financial crime and misconduct.
- To meet statutory reporting requirements under FICA, including STRs, CTRs, TPRs and IFTRs.
- To maintain accounting, tax and audit-ready records.
- To manage client relationships and respond to enquiries.
- To support internal controls, risk management and regulatory inspections.
- To improve website performance and digital services (where consent is obtained).
- Personal information is processed only for lawful, specific and explicitly defined purposes.

7. POPIA Compliance Principles

Stella Auream adheres to the eight POPIA processing conditions:

7.1 Accountability

Stella Auream accepts responsibility for ensuring compliance and has appointed an Information Officer.

7.2 Processing Limitation

Information is processed lawfully, minimally and only for legitimate purposes.

7.3 Purpose Specification

Information is collected for defined and lawful purposes.



7.4 Further Processing Limitation

Information is not processed beyond the original purpose unless permitted by law.

7.5 Information Quality

Stella Auream takes reasonable steps to ensure information is complete, accurate and up to date.

7.6 Openness

Individuals are informed of the information being collected and the purpose thereof.

7.7 Security Safeguards

Stella Auream implements appropriate technical and organisational measures.

7.8 Data Subject Participation

Individuals may access and correct their information as required by law.

8. Data Subject Rights

Individuals may exercise the following rights:

- Access to personal information
- Correction or updating of information
- Objection to certain forms of processing
- Withdrawal of consent (where processing is based on consent)
- Request for deletion (subject to statutory retention obligations)
- Right to lodge a complaint with the Information Regulator

Requests must be made in writing to the Information Officer.



9. Disclosure and Sharing of Personal Information

Stella Auream may disclose personal information to the extent legally permissible or required. This may include sharing with:

- The Financial Intelligence Centre
- Banks and financial institutions
- Auditors, compliance consultants and legal advisors
- Law enforcement and regulatory authorities
- Vetted third-party service providers

All operators acting on behalf of Stella Auream are contractually bound to maintain confidentiality and apply POPIA-aligned safeguards.

Stella Auream does **not** sell personal information.

10. Cross-Border Transfers

Personal information may be transferred outside South Africa only under conditions that meet POPIA requirements, including:

- Transfers to jurisdictions with adequate data protection laws
- Transfers subject to binding contractual safeguards
- Transfers necessary for performing a transaction
- Transfers based on the individual's explicit consent



11. Information Security

Stella Auream applies reasonable and appropriate security measures to protect personal information from loss, unauthorised access, misuse, modification or destruction. These measures include encryption, secure storage, role-based access controls, physical security, cybersecurity monitoring and secure disposal of records once no longer required.

Security controls are reviewed periodically in line with risk assessments and industry standards.

12. Retention and Destruction

Personal information is retained only for as long as necessary for lawful business purposes or as required by law. FICA-related information, including KYC documentation and risk assessments, is retained for a minimum of five (5) years from the date of the transaction or closure of the business relationship.

Once retention periods expire, information is securely destroyed or permanently deleted.

13. Cookies and Website Tracking

Stella Auream uses cookies to support website functionality. Non-essential cookies, such as analytics and marketing cookies, are used only with explicit consent in accordance with POPIA. Users may manage their cookie preferences through their browser settings.



14. Children's Information

Stella Auream does not intentionally collect or process the personal information of individuals under 18 years of age. If such information is inadvertently processed, it will be removed unless retention is legally required.

15. Information Officer

Stella Auream has appointed an Information Officer responsible for POPIA compliance, responding to data-subject requests, overseeing internal processes and managing privacy risks.

Information Officer:

Faaiza Haniff

Email: Faaiza@stella-auream.com

General POPIA enquiries: Faaiza@stella-auream.com

16. Complaints to the Information Regulator

Individuals may lodge complaints with:

The Information Regulator (South Africa)

Email: complaints.IR@justice.gov.za

Website: www.justice.gov.za/inforeg/

17. Policy Review

This Policy is reviewed periodically to ensure alignment with legislative requirements, regulatory expectations and operational practices. Updates will be published on the Stella Auream website.