

# Letter of Introduction

Full Client Name

Physical Address

Date

Dear

## Statutory information relating to Warwick Wealth (Pty) Limited and Accorn Investment Management (Pty) Ltd

This document relates to statutory disclosures required by the Financial Advisory and Intermediary Services Act (FAIS), as amended. Should you require any further information, please direct your queries to your financial investment advisor, who will facilitate said request.

is under supervision as a result of the time period for which they has been licensed in the financial services industry. This does not, however, negatively impact on his/her ability to be of service to you as he/she will be working under the close supervision of a member(s) of our senior management.

## Relationship between Warwick and Accorn

Accorn and Warwick operate in and are owned by the Spirit Invest Group. Warwick has an agreement with and makes use of Accorn's discretionary financial services expertise, in order to manage your Warwick investment products, on your behalf. Your Warwick investment advisor is responsible for and licensed to provide you with investment advice and recommendations in relation to the abovementioned investment products.

## License statuses

Accorn Investment Management (Pty) Limited ("Accorn") is a Discretionary Financial Services Provider, licensed as both a Category I and Category II Financial Services Provider (FSP), in terms of FAIS, with the License Number 1218.

Warwick Wealth (Pty) Limited ("Warwick") is a Financial Services Provider licensed as a Category I FSP, in terms of FAIS, with the License Number 44731.

## Authorised financial services and products

Accorn is authorised to render advice and provide intermediary and discretionary fund management services with respect to Long-Term Insurance subcategories B1, B1-A, B2, B2-A, and C, Structured Deposits, Retail Pension Benefits, Shares; Money market instruments; Debentures and securitised debt; Warrants, certificates and other instruments; Bonds; Derivative instruments; Participatory interests in one or more collective investment schemes; Long-term deposits and Short-term deposits.

Warwick is authorised to render financial advice with respect to Long-Term Insurance subcategories B1, B1-A, B2, B2-A, and C, Structured Deposits, Retail Pension Benefits, Shares; Money market instruments; Debentures and securitised debt; Warrants, certificates and other instruments; Bonds; Derivative Instruments; Participatory interests in a collective investment scheme; Long-term Deposits and Short-term Deposits.

Accorn holds a significant number of contractual agreements with local and offshore Linked Investment Service Providers (LISPs), Stockbrokers and Investment Managers in order to provide bespoke and tailored investment solutions to you as a Client.

## Authorised key individuals and representatives

Accorn has authorised the following Key Individuals to take responsibility for the advice rendered and intermediary services accepted and conducted by it: A.P. Meager; S.R. McKinnon; D.D.J. Taylor; J.W. Scheepers and R. Magee.

Warwick has authorised the following Key Individuals to take responsibility for the advice rendered by it: M.E. Wiese; J.W. Scheepers and R. Magee.

The Warwick Wealth Representative is the investment advisor who will be responsible for the advice and on-going contact with you with regard to your investments.

## Confidentiality

Where applicable, all information pertaining to you will be retained by Accorn and Warwick on a confidential basis and will not be made available to third parties unless required in order to conclude agreements relating to your investment(s), or where you have specifically authorised disclosure of this information, or where the sharing of your information is in the public interest or required by law.

## Conflict on interest

Accorn and Warwick acknowledge the need to identify, disclose and manage any potential conflict of interest to ensure that clients are not prejudiced in any way. In accordance with the abovementioned and their Conflict of Interest Management Policies, a high priority is placed on its clients' interests. As conflicts of interest affecting clients could undermine the integrity and professionalism of our business, any instances must be identified as early as possible. If conflict situations cannot be avoided, they must be managed equitably and in the client's interest. Potential conflicts of interest are inherent in any business and, therefore, it is not the aim of Accorn and Warwick to avoid all conflicts, but rather to take steps to identify and manage conflicts of interest to ensure that our clients are not unduly prejudiced.

Neither Accorn or Warwick have any shareholding in any product supplier.

## Insurance cover

Accorn and Warwick hold professional indemnity insurances underwritten by Camargue Underwriting Managers.

## Fees charged for our services

The costs of our services are outlined in our Investment Mandate, Fee Schedule Addendum and/or Offshore Addendum(s), as applicable to you, which, as a Client, you are required to agree to and sign.

## Compliance with the Financial Advisory and Intermediary Services Act ("FAIS")

Compliance with the FAIS Act will at all times be monitored by Warwick's Head of Client Administration, Christiaan Le Grange who may be contacted at **0800 50 50 50 / [complaints@warwickwealth.com](mailto:complaints@warwickwealth.com)**.

Our External Compliance Officer is Frederick Rossouw, who may be contacted at **087 897 6970 / [frits@compliserve.co.za](mailto:frits@compliserve.co.za)**.

## Financial Intelligence Centre Act ("FICA")

Accorn and Warwick are "Accountable Institutions" in terms of FICA and are, therefore, obliged to report suspicious and unusual transactions to the FIC. It should be noted that Accorn and Warwick will not, under any circumstances, accept any payment other than through electronic banking systems.

## Complaints

Complaints should be in writing and directed to Warwick's Head of Client Administration at the email address above. If your complaint is not settled to your satisfaction, you are entitled to refer the matter to the Office of the FAIS Ombud. The Ombud has been created to provide

you with a redress mechanism for any inappropriate investment made on your behalf, or inappropriate financial advice that you may feel that you have been given.

The Office of the FAIS Ombud may be contacted at P.O. Box 74571, Lynnwood Ridge, 0040.

Telephone: **012 762 5000**; Sharecall: **086 066 3274**;  
Email: **[info@faisombud.co.za](mailto:info@faisombud.co.za)**; Web: **[www.faisombud.co.za](http://www.faisombud.co.za)**.

Please sign the duplicate of this letter, enclosed herewith, for inclusion in our records. A signed copy may be emailed to us or alternatively posted to us, using the self-addressed envelope enclosed herewith, if relevant.

Yours sincerely,



**Marc Wiese – Warwick MD**

## Client acknowledgement

I confirm that I have received the above letter and that I fully understand its contents and that I consent to the use of my personal information as required.

Signature

Date

## Confidentiality and personal information protection disclosure

Your privacy is of utmost importance to us.

At Warwick, our objective is to make your experience using our services satisfying, confidential and safe. We comply with South African data protection legislation, namely, the Protection of Personal Information Act (POPIA) and as such, we have strict security procedures in place in respect of both the storage and the disclosure of any information provided to us.

We never share any personal information with any external third party unless required to do so by law or in compliance with our regulatory obligations.

For further information on disclosure of information, please contact our Group Information Officer, whose contact particulars are below.

This statement discloses what information we gather and how we use it.

Our Information Officer is Ryan Magee (Chief Operating Officer) and who is contactable via email – **[ryan.magee@warwickwealth.com](mailto:ryan.magee@warwickwealth.com)**.

Our Group Information Officer is registered with the Information Regulator and we are a deemed Responsible Party under POPIA.

Please read our detailed Privacy Policy and how we process your personal data. This privacy notice aims at providing, in brief, information about why we collect, use and store your data.

## Personal data we collect

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

- Your personal contact details, including demographic information such as your name, age, gender, nationality, email address, ID, telephone number and so forth. We may also collect details about your visits to our website for marketing statistics 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 and location.
- Where you fill out our web form/application forms to apply to be a client of the company, we may also collect your financial and personal information.
- We may also process your identification documents submitted at the time of registration to perform Know Your Customer (KYC) checks as well as identity verifications. Furthermore, 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 such as delivery and read receipts.

## How we use personal information

We process your data in accordance with South African law as well as other applicable laws. 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 for which it was originally collected, kept up to date, relevant, not excessive, not kept longer than necessary and kept secure by adopting industry best practises. We require your personal data in order that we:

- Comply with legal obligations;
- Provide services as requested by you under the contract entered with you;
- 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 the company for the provision of services such as: identity verification, fraud/sanctions screening, 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 may request this at [popia.data.requests@warwickwealth.com](mailto:popia.data.requests@warwickwealth.com).

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

Your data may be transferred across borders to countries with different levels of protection. Data transfers outside of South Africa (SA) may be for the purpose of administration or storage. Our database development and management teams are located in SA. 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.

## Data retention

We may retain your data as per our data retention policies per type of processing activity. 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. 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 are well-trained in processing your information. Our partners and third-party processors are all bound by strict data protection obligations through data processing contracts. Furthermore, we have adopted sound technical and compliance procedures to avoid loss, destruction, unauthorised access or omission to your data.

## Complaints

Should you have any queries with regard to our treatment of your information, require access to your personal information, or in case you have complaints, please write to our Group Information Officer at the address provided.

## Details of regulator

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

