Business Name: Wealth Associates Bespoke Solutions
Date: 1/7/2021

Policy: Direct Marketing

4.3.1. PURPOSE

Direct Marketing means to approach a Data Subject, either in person or by mail or electronic communication, for the direct or indirect purpose of *(Section 1 of the Protection of Personal Information Act 4 of 2013)*:

- Promoting or offering to supply any goods or services to the Data Subject.
- Requesting the Data Subject to make a donation of any kind for any reason.

POPIA includes specific requirements around direct marketing. The direct marketing requirement is the most public requirement of POPIA. Consumers have the right to specifically opt-in into direct marketing or request an opt-out of any direct marketing (*Refer to Annexure A*).

Direct Marketing is a well-established and accepted marketing medium. As such, the communication with the potential consumers should be factual, honest, decent, and informative, and should not violate any of the laws of the country. This Policy focus on two objectives:

- For those in direct marketing it lays down criteria for professional conduct.
- For the public it gives a clear indication of the limitations accepted by those using or working in direct marketing.

4.3.2. SCOPE

In Wealth Associates Bespoke Solutions, Direct Marketing involves the following three aspects:

- Direct Marketing consists of any promotional, publicity or communications activity sent directly to individuals or companies intended to promote Wealth Associates Bespoke Solutions's products and services.
- Wealth Associates Bespoke Solutions carries out Direct Marketing in accordance with the Privacy Notice and legal requirements (*Refer to Annexure A*).
- This Policy should be read in conjunction with *Acceptable Usage Policy*.

4.3.3. USE OF DIRECT MARKETING

- Wealth Associates Bespoke Solutions uses e-mail and e-marketing to send information directly to its business clients and contacts including insights, event invitations and news on products and services.
- This information is not sent automatically, and the consumer is not obliged to receive it.
- Wealth Associates Bespoke Solutions operates an "Opt-in" option for its Direct Marketing (*Refer to Annexure C*). This means the consumer will only be sent and receive communications if they are current consumers or where Wealth Associates Bespoke Solutions has the consumer’s consent to do so.
- Wealth Associates Bespoke Solutions use text messaging, telesales, social media platforms or online communication platforms to carry out Direct Marketing.
- Wealth Associates Bespoke Solutions may occasionally share Personal Information with trusted Third-Parties to help Wealth Associates Bespoke Solutions deliver efficient and quality services. Any such recipients will be contractually bound to safeguard the data entrusted to them and will not contact the consumer to offer services.

4.3.4. DIRECT MARKETING TO BE RECEIVED FROM Wealth Associates Bespoke Solutions

Wealth Associates Bespoke Solutions will use and process data to send communications about:

- Events, including invitations to seminars, webinars, and networking events.
- Insights, relating to the topics which the consumer have indicated are of interest as part of the opt-in process.
- New products or services.

- News and Information about Wealth Associates Bespoke Solutions.

4.3.5. CIRCUMSTANCES WHERE DIRECT MARKETING WILL BE RECEIVED

- The consumer will only receive communications from Wealth Associates Bespoke Solutions if the consumer is a current client of Wealth Associates Bespoke Solutions or have opted-in to receive these communications.
- The consumer will be invited by e-mail to opt-in online because:
    - The consumer is a client of Wealth Associates Bespoke Solutions.
    - The consumer attended at an event, seminar or webinar hosted by Wealth Associates Bespoke Solutions.
    - The consumer attended at a public event organised by Wealth Associates Bespoke Solutions.
    - The consumer provided a business card directly to an employee of Wealth Associates Bespoke Solutions.
    - The Consumer registered their contact details to obtain information from Wealth Associates Bespoke Solutions's website.
    - Wealth Associates Bespoke Solutions received an e-mail request from the consumer to attend an event Wealth Associates Bespoke Solutions have advertised via social media or on the Website.
    - An employee added the consumer's details to the database due to an existing relationship.

Wealth Associates Bespoke Solutions does not buy lists from third-parties to use for Direct Marketing.

4.3.6. REFUSAL OF RECEIVING DIRECT MARKETING INFORMATION

If the consumer would like to withdraw their consent or opt-out of receiving any Direct Marketing, they can do so using Wealth Associates Bespoke Solutions's Unsubscribe Notice or Opt-Out options (*Refer to Annexure D*).

4.3.7. ACCURACY OF PERSONAL INFORMATION IN DIRECT MARKETING

Wealth Associates Bespoke Solutions does not rely on consumer consent to receive Direct Marketing indefinitely. The consumer will receive an email from Wealth Associates Bespoke Solutions at intervals of no less than 2 years. The consumer will be asked to re-confirm their consent and preferences, to ensure that the data Wealth Associates Bespoke Solutions holds, such as contact details, are current and accurate (*Refer to Annexure B*).

4.3.8. RIGHTS RESERVED BY Wealth Associates Bespoke Solutions

Wealth Associates Bespoke Solutions reserves the right to monitor, audit, screen, and preserve Wealth Associates Bespoke Solutions information as Wealth Associates Bespoke Solutions deems necessary, to maintain compliance with these Policies and all relevant provisions of the Promotion of Access to Information Act 4 of 2013 (POPIA). Any distribution, unauthorised use, or benefit from Wealth Associates Bespoke Solutions information by an employee or user, in contravention of these Policies may result in disciplinary action being taken by Wealth Associates Bespoke Solutions. The use of any system in such a way that breaches any of the provisions of these Policies, will be reported to the Information Officer at Wealth Associates Bespoke Solutions, which may lead to further disciplinary action being taken.

4.3.9. ENFORCEMENT AND POTENTIAL DISCIPLINARY ACTIONS

Any violation of these Policies may result in disciplinary action being taken against the employee or user in question. Such disciplinary action will be taken in accordance with Wealth Associates Bespoke Solutions's disciplinary code and may include the termination of employment for employees of Wealth

Associates Bespoke Solutions, or cancellation of contractual relations in the case of other users, such as contractors or consultants.

4.3.10. POLICY AWARENESS AND UPDATE

Training and awareness:

The requirement for these Policies will be explained in detail in Wealth Associates Bespoke Solutions's induction program, in the case of employees of Wealth Associates Bespoke Solutions. Further training regarding these Policies will be offered from time to time by Wealth Associates Bespoke Solutions. Wealth Associates Bespoke Solutions will specifically make users who are not employees of Wealth Associates Bespoke Solutions aware of these Policies.

Dissemination:

These Policies will be made available on Wealth Associates Bespoke Solutions's website, intranet, or notice boards.

Review:

These Policies will be reviewed from time to time to ensure ongoing compliance with POPIA. Such revisions will take place at least annually.

4.3.11. INTERNAL DOCUMENT APPROVAL

Information Officer Name	Date
Michelle Vivian	1/7/2021

4.3.12. DOCUMENT VERSION CONTROL

Version	Date	Summary of Changes
1.0.0.0	1/7/2021	Version 1