

Heritage Vault – Privacy Notice



HERITAGE VAULT

Pay it forward

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Heritage Vault (Pty) Ltd (“Heritage Vault”, “we”, “our”, “us”) recognises the importance of transparent and responsible use of your Personal Information.

This Privacy Notice (“Notice”) outlines how Heritage Vault collects, stores, processes, and protects your Personal Information.

Who does this Notice apply to?

This Notice applies to you if you are:

1. A visitor to our website; or
2. A user of our application/services.
3. Nominated as a confidant

1. What is Personal Information?

For the purposes of the services that Heritage Vault provides and the regulations that Heritage Vault needs to comply with, “Personal Information” refers to any information that relates to an identified or identifiable individual. Relevant examples of Personal Information include name, email address, mailing address, personal will and testament details, phone number, financial information, and identity documentation.

2. Privacy Regulations Compliance

Because Heritage Vault provides services globally, we comply with different privacy legislation worldwide such as the General Data Protection Regulation (“GDPR”) in the EU, the Protection of Personal

Information Act (“POPIA”) in South Africa, The Data Protection Act in the UK (“UK DPA”), and the Personal Information Protection and Electronic Documents Act (“PIPEDA”) in Canada, among others.

We respect your privacy rights at all times and take reasonable steps to protect your Personal Information according to the expectations of the laws of where you are located.

3. Our Responsibility to your Personal Information

Some privacy regulators classify organisations depending on the role they play in processing Personal Information. A Data Controller is an organisation that determines how they collect and process Personal Information.

Heritage Vault is considered a Data Controller because we determine how we collect and process your Personal Information. We are directly responsible for the decisions made about how we collect, process, disclose, store, and protect your Personal Information.

4. Personal Information Collection and Purpose of Processing

Personal Information We Collect Directly from You

The following table details when we collect Personal Information directly from you, the types of Personal Information we collect directly from you, and how we process it.

When does Heritage Vault collect my Personal Information?	Type(s) of Personal Information Collected	Purpose(s) for Processing your Personal Information
Account Registration	When you sign up for an account with us, we collect your name and surname, email address, phone number, billing address, password, preferred currency, and secure passphrase needed to reset your password.	<ul style="list-style-type: none">To create, manage, and validate your customer account
Contact Form	For direct communication with any of our representatives through our website contact form, we collect your name, email address, phone number, and message.	<ul style="list-style-type: none">To acknowledge and respond to your contact requests

Logging into Heritage Vault	When you log into your Heritage Vault account, we collect your email address and password.	<ul style="list-style-type: none"> To validate and authenticate your customer account
Populating your "Data Vault"	<p>Your "Data Vault" is where you input all your important information to be stored until it becomes available to your confidants when you pass away or become incapacitated.</p> <p>We collect information you may fill out across defined categories. Personal Information collected could include basic information, your living will, financial assets, liabilities, ownership documents, and more.</p>	<ul style="list-style-type: none"> To have all your important information securely stored in your "Data Vault"
Email Communication	When you agree to sign up for email communication from Heritage Vault, we collect your email address.	<ul style="list-style-type: none"> To communicate with you information about your Heritage Vault account and the services we provide
Support Ticket	For direct communication with any of our representatives through our support ticket system, we collect your name, email address, ticket message, and message attachments.	<ul style="list-style-type: none"> To acknowledge and respond to your support tickets
Payment Processing	When your payments are processed via the payment processors we have partnered with, we collect information about your preferred payment method.	<ul style="list-style-type: none"> To streamline our payment processing so that your invoices automatically direct you to your preferred payment method
Visit History	When you log into your Heritage Vault account, we collect your IP address, the user agent, status information, and last active time and date.	<ul style="list-style-type: none"> To ensure account security and to enable you to verify your account access history

Personal Information We Collect Indirectly

Confidant Nomination: We collect your Personal Information indirectly when you are nominated as a confidant by a Heritage Vault customer. Confidants are trusted people that our customers select for their stored information to become available to when they pass away or become incapacitated.

When our customers nominate their confidants, we indirectly collect the confidant's name, email address, role/relationship to the customer, and their access details/settings. We will send communication to the contact details we have been provided and you have the option to accept or decline your nomination as a confidant.

Personal Information We Collect Automatically

Device And Usage Information: We automatically collect information about your IP address, browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and the time spent on pages within the website.

We use this information to gain insights into how our visitors navigate our website to provide you with a better web experience.

Legal Basis for Processing

To comply with different privacy legislation worldwide, specifically with GDPR in the EU, we require to provide a legal basis for the processing of your Personal Information. Heritage Vault will not process your Personal Information unless we have a legal justification to do so. We will only process your Personal Information if:

- We have obtained your explicit consent prior to processing your Personal Information;
- If we need your Personal Information to perform a contractual obligation;
- If we need to process your Personal Information to fulfill our legal and regulatory obligations; or
- If we have a legitimate interest that will not put your rights and freedoms at risk.

5. Personal Information Disclosure

Heritage Vault will not disclose information stored in your 'data vault' to anyone other than your nominated confidants, and only when the requirements for disclosure are met. We will only disclose your personal information outside of what is contained in your 'data vault' to the following parties under specific circumstances:

- To Heritage Vault employees, if required, to fulfill your requests;
- To contracted service providers assisting with our business operations, including but not limited to fraud prevention, payment processing, and technology services;
- To law enforcement, regulatory bodies, or courts when we are required to do so under applicable laws and regulations;
- In connection with the sale or reorganization of all or part of our business, as permitted by applicable law.

Personal Information from Minors

We do not directly collect Personal Information from anyone under the age of 18, but Personal Information about people under the age of 18 may be indirectly collected and stored if you do decide to input that information into your "Data Vault" (e.g., information about your children).

If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us at rachelle@heritage-vault.com. If we become aware that we have collected Personal Information from children without verification of parental consent, we will take steps to remove that information from our servers.

6. Personal Information Security

We take the security of personal information very seriously and commit to protecting the Personal Information we collect, process and disclose about you. We maintain appropriate safeguards and take reasonable steps to protect your Personal Information. Some of these security measures include data encryption, multi-factor authentication, firewalls, and restricting access to Personal Information to employees and partners only with a legitimate need to access such information.

We ensure that all the parties that we disclose your Personal Information to, both internal and external to Heritage Vault, have contractual obligations to protect the security and the confidentiality of your Personal Information.

7. Personal Information Transfers

The Personal Information that we collect from you for the purpose of our services resides in South Africa, the EU, and the US. We ensure that your data is safeguarded by closely working with our partners to ensure that the risks to your privacy are minimized. We take appropriate steps to ensure that transfers of Personal Information across borders are in accordance with privacy legislation, and we only transfer Personal Information to partners and other third-party organizations where we are satisfied that adequate levels of protection are in place to protect your information.

For Personal Information transferred out of the EU, UK or Switzerland into countries that are not considered to have an adequate level of Personal Information protection, we obtain contractual commitments from the organizations we transfer your Personal Information to in order to ensure that your Personal Information will be safeguarded at a similar level as in the EU, UK or Switzerland.

8. Personal Information Retention

We are expected to retain your Personal Information for an established period of time for regulatory, legal, tax, or business requirements.

We retain your Personal Information for no longer than reasonably necessary to fulfill the purposes of which we collected it for or to comply with the law, to prevent fraud, to facilitate an investigation, to defend against legal claims, or to exercise our legal rights.

9. Rights You Can Exercise About Your Personal Information

Subject to any exceptions provided by law, you have the right to request access to, update, or delete your Personal Information.

You also have the right to request restriction of or object to the processing of your Personal Information, and you have the right to request to have your data transferred to another organization in a commonly used format.

For each case, we will inform you of the consequences of your request and if there are any exemptions to honouring your requests based on legal or contractual requirements.

To submit any request about your Personal Information you may contact us via email at rachelle@heritage-vault.com.

10. EU, UK and Switzerland Residents – Right to Lodge a Complaint with a Supervisory Authority

If you reside in the EU, UK or Switzerland and want to lodge a complaint with a Data Protection Authority, you may do so in the country where you reside, where you work, or where you may have experienced an issue with the processing of your Personal Information.

Please visit https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm for a list of all Data Protection Authorities in the EU.

If you reside in the UK, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/make-a-complaint>.

If you reside in Switzerland, you can contact the Federal Data Protection and Information Commissioner (FDPIC) using the reporting form at https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular_betroffene.html

South African Residents – Right to Lodge a Complaint with the Information Regulator

For residents of South Africa, if your Personal Information has not been processed in accordance with POPIA and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator at <https://www.justice.gov.za/inforeg/index.html> or email complaints.IR@justice.gov.za.

Contact Us

If you have any further questions regarding the Personal Information that Heritage Vault or any of our partners collect and process, or if you have feedback regarding this Notice, you may contact us at rachelle@heritage-vault.com.

Changes and Updates to this Notice

This Notice may be updated from time to time to reflect changes in our Personal Information processing practices. We will make a reasonable effort to notify you of any significant changes and indicate the date of the latest revision using the “Last Updated” legend