

PRIVACY NOTICE / PROTECTION OF PERSONAL INFORMATION POLICY Trinity Board of Executors (Pty) Ltd In terms of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (“POPIA”)

Effective date: 19 January 2026

1. Introduction and commitment to privacy Trinity Board of Executors (Pty) Ltd (“we”, “us”, “our” or “Trinity”) is a responsible party (as defined in POPIA) that provides fiduciary services, including acting as executor of deceased estates, trustee of trusts, administration of estates, estate planning, and related professional services.

We are committed to protecting the privacy and security of personal information in accordance with POPIA, the Promotion of Access to Information Act, 2000 (PAIA), and other applicable South African laws. This Privacy Notice explains how we collect, process, store, share, and protect personal information.

2. Contact details of the Responsible Party and Information Officer Responsible Party: Trinity Board of Executors (Pty) Ltd

Physical address: 73 Beyers Naude Drive, Cnr Beyers Naude & Preller Drive | Roosevelt Park | Randburg | 2195

Email: nicole@trinityexec.co.za

Telephone: 011 646 0064

Information Officer: Nicole Van Rooyen

Email: popia@trinityboe.co.za

3. Personal information we collect and process We collect and process various categories of personal information depending on the services provided. This may include:

- **Deceased data subjects** — full name, ID number, date of birth/death, marital status, addresses, financial information, asset details, beneficiary details, medical history (where relevant to estate administration), will/trust documents;
- **Executors, trustees, beneficiaries, heirs, family members** — full name, ID number/passport, contact details (phone, email, physical/residential address), relationship to deceased, banking details, tax numbers, occupation, income/asset information;
- **Clients / prospective clients** — name, contact details, identity documents, financial information, estate planning instructions;

- **Service providers / third parties** — names, contact details, banking information, tax/VAT numbers;
- **Special personal information** (where strictly necessary and lawfully justified) — health/medical information, criminal records (e.g. in vetting executors or in estate disputes), racial/ethnic origin (where relevant to succession or BEE-related matters).

We process personal information primarily for the purposes listed in section 4 below.

4. Purposes for which we process personal information We process personal information only for specific, explicitly defined, and lawful purposes, including:

- Administering deceased estates in terms of the Administration of Estates Act, 1965;
- Acting as executor, trustee, curator, or administrator as appointed by court, will, or agreement;
- Communicating with beneficiaries, heirs, family members, creditors, SARS, banks, and other relevant parties;
- Complying with legal and regulatory obligations (e.g. FICA, Tax Administration Act, Master of the High Court reporting);
- Providing fiduciary, estate planning, and trust-related services;
- Detecting and preventing fraud, money laundering, or other unlawful activities;
- Maintaining records and archives as required by law;
- Responding to queries, complaints, or requests from data subjects;
- Enforcing our rights or defending claims.

We rely on the following lawful bases under POPIA (section 11):

- Processing is necessary to carry out actions for the conclusion or performance of a contract;
- Processing is required by law (e.g. estate administration legislation);
- Processing protects a legitimate interest of the data subject or a third party (balanced against privacy rights);
- Consent (obtained where no other ground applies, and always withdrawable).

5. Sources of personal information We collect personal information directly from you, or indirectly from:

- The deceased's will, death certificate, or estate documents;
- The Master of the High Court;
- Banks, financial institutions, SARS, employers, or other third parties;
- Public records (e.g. Deeds Office, credit bureaus where permitted);
- Family members, beneficiaries, or legal representatives.

6. Sharing / disclosure of personal information We may share personal information with:

- The Master of the High Court, SARS, banks, pension/provident funds, insurers;
- Our professional advisors (attorneys, accountants, valuers, auctioneers);
- Service providers (IT, cloud storage, document management — under strict confidentiality agreements);
- Government/regulatory authorities when required by law;
- Other third parties with your consent or where required for estate administration.

We do not sell personal information.

7. Transborder flows of personal information Where personal information is transferred outside South Africa (e.g. cloud storage providers, international banks, or foreign beneficiaries), we ensure an adequate level of protection through binding agreements, adequacy decisions, or other lawful mechanisms in terms of Chapter 9 of POPIA.

8. Retention of personal information We retain personal information only for as long as necessary to fulfil the purposes outlined above, or as required by law (e.g. estate files are typically retained for prescribed periods under the Administration of Estates Act and general record-keeping laws). Thereafter, information is securely destroyed or anonymised.

9. Security measures We implement appropriate technical and organisational measures to protect personal information against loss, misuse, unauthorised access, disclosure, alteration, or destruction (e.g. encryption, access controls, firewalls, staff training, confidentiality agreements).

10. Your rights as a data subject You have the right to:

- Be informed of the personal information we hold;
- Request access to, correction, or deletion of your personal information;
- Object to processing (on reasonable grounds);

- Request destruction/deletion when no longer authorised;
- Withdraw consent (where processing is based on consent);
- Lodge a complaint with the Information Regulator (complaints.IR@justice.gov.za).

To exercise these rights, contact our Information Officer.

11. Changes to this notice We may update this Privacy Notice from time to time. The latest version will be available on our website [insert website URL if applicable] or upon request.

12. Queries and complaints If you have any questions about this notice or our privacy practices, or wish to exercise your rights, please contact our Information Officer at the details provided above.

By engaging our services or providing personal information to us, you acknowledge that you have read and understood this Privacy Notice.