POPI Privacy Policy Statement

Respecting and protecting your Personal Information is very important to us. It is also a Constitutional right, legal, and good business practice requirement, which we take very seriously.

Your Personal Information is defined by the Protection of Personal Information Act (the Act) as:
"means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person".

In line with the 8 Conditions in the Protection of Personal Information Act, 4 of 3013 (the Act), we

- Accept joint responsibility and accountability with you to responsibly manage and protect your Personal Information when providing our services and solutions to you;
- Undertake to receive, only from you, and process the Personal Information that is necessary for the purpose to assist you with your required solutions, conclude the necessarily related agreements and consider the legitimate legal interests of everyone concerned, as required by the Act and to respect your right to withdraw your consent for the processing of your Personal Information;
- Undertake to only use your Personal Information for the purpose required to assist you or provide solutions to you;
- Undertake not to share or further process your Personal Information with anyone if not required for assisting you with your solutions or by the law;
- Undertake to be open and transparent and notify you as and when required by law regarding why and how your Personal Information needs to be collected;

- Undertake to safeguard and protect your Personal Information in our possession;
- Undertake to freely confirm what Personal Information we have, to update and correct the Personal Information, and to keep it for no longer than legally required.

We, or the companies who provide or assist with the solutions you require, need to collect, use, and keep your Personal Information as prescribed by relevant laws and regulations and for reasons such as:

- To share with and provide relevant products or services to you, to carry out the transaction you requested, and to maintain our relationship;
- To respond to your queries;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For operational purposes required to assist you with the solutions you require;
- For audit and record-keeping purposes;
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

- Personal information derived from existing records may be used in future business transactions or solutions.

We may need to share your Personal Information and/or utilise software or online platforms to enter and process your information for an application, claims, or business management purposes. This will only be done in strict adherence to the requirements of the Act.

We and the companies providing the solutions to you may use “cookies” on our and their websites. They enable us and them to improve your future visits to our site as well as provide you with a more user-friendly experience.

Any additional information or concerns can be found and raised with the Information Regulator, who can be contacted as shared below, but please feel free to contact us first to discuss any questions or concerns you may have:

Website: https://www.justice.gov.za/inforeg/
Tel: 012 406 4818
Email: inforeg@justice.gov.za

Personal Information Processing Consent

We respect your privacy and are committed to protect and responsibly manage your personal information. To comply with the Protection of Personal Information (POPI) Act, we require your consent and authorisation to process your personal information, including your special personal information as defined by the POPI Act, which we collect and process to enable us to provide the services, assistance and/or product solutions you may require. The POPI Act defines the "processing" of personal information as:

"**…** any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

(b) dissemination by means of transmission, distribution or making available in any other form; or

(c) merging, linking, as well as restriction, degradation, erasure or destruction of information."

We will collect the minimum required information from you and we will process your personal information only for the purposes for which it was collected or as agreed with you. These purposes include:

- To provide our advice, services and products to you, to help you take out or maintain financial products and/or carry out the transactions you requested, as well as to maintain our contractual relationship;
- To assist you with queries and/or claims relating to your financial products or financial plan;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes, where applicable;
- For audit and record keeping purposes.

We may also be required to transfer personal information to a third party who is in a foreign country but may only do so if

- The foreign country has a law that provides adequate protection.
- There are binding corporate rules that provide adequate protection.
- There is an agreement between the sender and the receiver that provides adequate protection.
- You consent.
- The transfer is necessary for the responsible party to perform in terms of a contract.

Apart from the above reasons, we will also process your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

There will be times when we may need to share your personal information with third party service providers and/or operators (e.g. insurance companies, investment companies, our auditors, compliance firm etc.) who will be involved in the delivery of products or services to you or to us, in support of our service offerings to you and our business. An 'operator' is defined by the POPI Act as: "…a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party". We are the responsible party with respect to your personal information.

There are also times when we will use the information systems of these third-party operators to process your personal information to help us in providing you with the required advice and/or products and services. We are required by law to have agreements in place with these operators to ensure that they protect and process personal information securely.

As a client, you have the right, at any time:

- to ask us to update, correct or delete your personal information, which includes the authority
- and consent provided in this form;
- to object to the processing of your personal information;
- to withdraw your consent;
- to complain to the Information Regulator, whose contact details are:
  Tel: 012 406 4818/ Email: inforeg@justice.gov.za.