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Directors: Andy Bolton | Nick Bands | Debbie Jordaan | Nigel Bands

POPIA POLICY

The Protection of Personal Information (POPI) Act requires us to inform you how our company uses, discloses and destroys personal information that we obtain from you. We are committed to protecting your privacy and will ensure that personal information is used appropriately, transparently and according to applicable law.

1. DEFINITIONS

- 1.1. For purposes of this policy, **"clients"** included potential, existing and former clients.
- 1.2. **"child"** means a person under the age of 18 years who is not legally competent, without the assistance of a parent/guardian, to take any action or decision in a matter concerning him or herself.
- 1.3. **"consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 1.4. **"personal information"** means any information relating to an identifiable, living, natural person, and where applicable, an identifiable existing juristic person and includes:
 - 1.4.1. Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
 - 1.4.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 1.4.3. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 1.4.4. the biometric information of the person
 - 1.4.5. 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;
 - 1.4.6. Personal opinions, view or preferences of the person;
 - 1.4.7. The views or opinions of another individual about the person; and
 - 1.4.8. 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

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2. INTRODUCTION

- 2.1. The Company is an authorised financial services provider who is obliged to comply with The Protection of Personal Information Act ('POPI').
- 2.2. Through the provision of services the Company collects, uses and discloses certain aspects of the personal information of clients, employees and other stakeholders.
- 2.3. The Company guarantees its commitment to protecting individual's privacy and ensuring their personal information is used appropriately, transparently, securely and in accordance with applicable laws.
- 2.4. This policy sets out how the Company deals with personal information and for what purpose the information is used for.
- 2.5. This policy is drafted in conjunction with the Financial Advisory and Intermediary Services Act (FAIS) and the relevant sections of the General Code of Conduct for Authorised Financial Services Providers (GCOC).

3. THE PERSONAL INFORMATION COLLECTED

- 3.1. The Company collects and processes personal information during the process of rendering financial services. The type of personal information will depend on the need for which it is collected and will be processed for that purpose only. Examples of the personal information we process includes but is not limited to:
 - 3.1.1. Clients Identity number, name, surname, address, postal code, marital status and how many dependents they have;
 - 3.1.2. Assets and liabilities;
 - 3.1.3. Income and expenditure
 - 3.1.4. Existing insurance and/or investments
 - 3.1.5. Medical information as may be required for underwriting purposes
 - 3.1.6. Any other information required by us, suppliers and Insurers in order to provide clients with an accurate analysis of their Insurance needs.
- 3.2. The Company may also process personal information for its own internal marketing purposes to ensure our products and services remain applicable and appropriate.
- 3.3. We have agreements in place with all our product suppliers, Insurers and third party service providers to ensure there is a mutual understanding with regard to the protection of personal information. Our suppliers are subject to the same regulations as we are subjected to.
- 3.4. Personal information will only be processed if the personal information is adequate, relevant and not excessive and for the express purpose for which it was obtained.

4. HOW PERSONAL INFORMATION IS USED

- 4.1. Personal information will only be used for the purpose for which it was collected and agreed. This may include but is not limited to providing advice and rendering intermediary services in financial products for which we are authorised to render (refer to disclosure document and representatives authorisation) and to carry out the transactions requested, for example
 - 4.1.1. Financial transactions
 - 4.1.2. For underwriting purposes;
 - 4.1.3. Assessing and Processing claims;
 - 4.1.4. Conducting credit reference searches or verification;
 - 4.1.5. Confirming, verifying and updating details;
 - 4.1.6. For purposes of claims history;
 - 4.1.7. For the detection and prevention of fraud, crime, money laundering or other malpractice;
 - 4.1.8. Conducting market or customer satisfaction research;
 - 4.1.9. For audit and record keeping purposes;
 - 4.1.10. In connection with legal proceedings;
 - 4.1.11. Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
 - 4.1.12. Providing communications in respect of FSP and regulatory matters that may affect clients; and
 - 4.1.13. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 4.2. Personal information may also be processed in the employer-employee relationship.
- 4.3. According to 11 of POPIA, personal information may only be processed if certain conditions are met. These are listed below along with supporting information for the Company processing of personal information:
 - 4.3.1. Client consents to the processing – consent is obtained from clients during the introductory, appointment and needs analysis stage of our relationship;
 - 4.3.2. The processing is necessary – in order to conduct an accurate analysis of client's financial product needs, certain personal information is required;
 - 4.3.3. Processing complies with an obligation imposed by law on the Company – The Financial Advisory and Intermediary Services Act ('FAIS') requires Financial Service Provider's ('FSP's') to conduct a needs analysis and obtain information from clients about their financial product needs in order

to provide them with applicable and beneficial products;

4.3.4. Processing of personal information protects a legitimate interest of the client – it is in the client's best interest to have a full and proper needs analysis performed in order to provide them with an appropriate and beneficial product, this requires obtaining personal information;

4.3.5. Processing is necessary for pursuing the legitimate interests of the Company or of a third party to whom information is supplied – in order to provide our clients with products both ourselves and our product suppliers and insurers need certain personal information from the clients to make an expert decision on the unique and specific product they require.

5. **DISCLOSURE OF PERSONAL INFORMATION**

5.1. We may disclose personal information to our providers whose services or products we use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

5.2. We may also share personal information with, and obtain personal information from third parties for the reasons already discussed in section 3 & 4 above.

5.3. We may also disclose clients' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

6. **SAFEGUARDING CLIENTS INFORMATION**

6.1. It is a requirement of POPIA to adequately protect the personal information we hold and to avoid unauthorised access and use of your personal information. We will continuously review our security controls and processes to ensure that your personal information is secure.

6.2. The following procedures are in place in order to protect your personal information:

6.2.1. The Company **INFORMATION OFFICER** is Debbie Jordaan, whose details are available below and who is responsible for the encouragement of compliance with the conditions of the lawful processing of personal information and other provisions of POPIA;

6.2.2. **THIS POLICY** has been put in place throughout the Company and all staff will undergo training on this policy and the POPI Act.

6.2.3. Each employee is required to sign a **CONFIDENTIALITY AGREEMENT** which forms part of their Employment Contract;

6.2.4. Our hard copy client files are stored onsite at our premises which are locked secured premises;

6.2.5. Our archived client information is stored at onsite in locked secured premises

or by **Metrofile** a third party provider who is also governed by POPI and with whom we have a Service Level Agreement in place;

6.2.6. FSP's internal computers / server have all the necessary electronic protection and are individually password protected (refer to Disaster Management Plan)

6.2.7. **A POPI BREACH REGISTER** will be kept to log any breaches of security of personal information to report on and manage said incidents. The register will be maintained by the Information Officer.

6.2.8. In the event that personal information has been compromised, or if there is reasonable belief that a compromise has occurred, the Company will: -

6.2.8.1. Notify the Information Regulator;

6.2.8.2. Notify the person whose information has been compromised. The notification will: -

6.2.8.2.1. take place as soon as reasonably possible after the breach has been discovered;

6.2.8.2.2. be in done in writing to the affected persons;

6.2.8.2.3. contain enough information to allow the affected persons to take protective measures against further loss or damage;

6.2.8.2.4. describe the measures taken to address the security compromise;

6.2.8.2.5. recommend measures the person can take to mitigate the compromise;

6.2.8.2.6. make known the identity of the unauthorised person if it is known to the Company.

6.2.9. **CONSENT** to process personal information is obtained from clients (or a person who has been given authorisation from the client to provide THE CLIENT'S personal information) during the introductory, appointment and needs analysis stage of rendering financial services.

6.2.10. **CONSENT** to process personal information from staff will be obtained at employment take on stage.

6.2.11. **CONSENT** to process personal information from other parties will be obtained as and when required.

7. ACCESS AND CORRECTION OF PERSONAL INFORMATION

7.1. You have the right to access personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information on

reasonable grounds. Once you object to the processing of your personal information, the Company may no longer process said personal information.

7.2. Once you withdraw consent for the Company to process your personal information, the Company is still obliged under other legislation to keep the information for 5 years after termination of the relationship.

7.3. The details of our Information Officer and head office are as follows:

INFORMATION OFFICER DETAILS

NAME: DEBBIE JORDAAN

TELEPHONE NUMBER: 041 398 3900

FAX NUMBER: 041 363 5047

POSTAL ADDRESS: P.O. BOX 7545, NEWTON PARK, PORT ELIZABETH, 6055.

PHYSICAL ADDRESS: SOUTHERN LIFE GARDENS, BUILDING F, 1ST FLOOR, 2ND AVE,
NEWTON PARK, PORT ELIZABETH, 6054

E-MAIL ADDRESS: debbie@southsure.co.za

8. AMENDMENTS TO THIS POLICY

Amendments to this policy will take place on an *ad hoc* basis or at least once a year. Clients are advised to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.