



contact@southsure.co.za | Reg No 1991/01960/07 | FSP No 7781 | www.southsure.co.za  
Directors: Andy Bolton | Nick Bands | Debbie Jordaan | Nigel Bands

## SOUTHSURE BROKERS PRIVACY NOTICE

This Privacy Notice describes how Southsure Brokers (hereinafter referred to as “the Company”) collects, uses, discloses, retains and protects your personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws. The Privacy Notice applies to any website, application, form, document, product or service which references this Privacy Notice.

POPIA defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person”. This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

### 1. Who we are

1.1. In this Privacy Notice, any reference to the company refers to Southsure Brokers (Pty) Ltd, Company Registration Number 1991/01960/07, FSP Number 7781.

### 2. How we collect information

2.1. We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

2.1.1. Directly from you when we gather information from you in order to render a financial service to you; when you complete a product or service application form, electronically, telephonically or by way of a hard copy;

2.1.2. Indirectly from you when you interact with us electronically by way of our website, apps, or social media channels;

2.1.3. From other financial product providers or third-party financial parties to whom you have given us permission to obtain information from.

2.2. We require your personal information in order to provide you with our products and services.

2.3. Where you fail to provide us with the necessary information, the appropriateness of the advice may be compromised. It is therefore, important that you provide complete and accurate information. You are responsible for informing the Company if your information changes.

#### Port Elizabeth

Southern Life Gardens, Building F, 1st Floor, 2nd Ave, Newton Park, Port Elizabeth  
PO Box 7545, Newton Park, 6055 | t +27 (0) 41 398 3900 | f +27 (0) 41 363 5047

#### Johannesburg

Shop 3, Stepping Stones Garden Village, 283 Honeydew Rd, West North Riding  
t +27 (0)10 465 0016 | Private Bag X11, Gallo Manor, 2052

### **3. Collection of information by third parties**

- 3.1.** Owners or information system administrators of third-party websites or online portals may collect personal information about you when you use these links. The Company does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. The Company does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.
- 3.2.** The Company may also use certain social networking services such as Facebook, WhatsApp, Instagram and Twitter to communicate with the public and clients. When you communicate with the Company through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies which are independent of the Company's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

### **4. What information we collect**

- 4.1.** Your relationship with the Company determines the exact nature of the personal information the Company processes, and the purpose for which such personal information is collected and used. However, in most cases, if we are handling your personal information as part of our role as an authorised financial services provider, the personal information we may process includes the following:
  - 4.1.1.** Information about you – for example, your name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, current status of health, medical history and any existing conditions of each person insured. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties. We acknowledge that information about your health is special personal information. Note that we will use that information strictly in accordance with applicable laws and for insurance purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).
  - 4.1.2.** Contact information – in some cases, for example, we may receive your email, address, phone number and postal address.
  - 4.1.3.** Financial information – we may process information related to payments you make or receive in the context of a financial product. We may process information regarding your income, expenses, assets, liabilities, investments, retirement and other financial provisions in the context of providing financial advice and intermediary services.
  - 4.1.4.** Contractual information – for example, details about the policies you hold and with whom you hold them.

- 4.1.5. Health information such as smoker status or medical-related issues relevant to a policy or a claim you have made.

## 5. How we use your information

- 5.1. We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner and/or controlling persons. **We are also required by various laws to maintain a record of our dealings with clients.**
- 5.2. **In order for us to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, we need to collect, use and disclose the personal information** of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.
- 5.3. To the extent permissible under applicable laws, the Company may use your information:
  - 5.3.1. To provide you with our financial products and services, and maintain our relationship with you;
  - 5.3.2. To provide you with financial advice and intermediary services;
  - 5.3.3. To conclude and administer your financial product;
  - 5.3.4. To execute a transaction in accordance with your request;
  - 5.3.5. To assess, check, and process claims;
  - 5.3.6. To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
  - 5.3.7. To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the Financial Sector Conduct Authority and Prudential Authority);
  - 5.3.8. To undertake credit reference searches and/or verification;
  - 5.3.9. For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of the Company's policies;
  - 5.3.10. For purposes of online login and authorisation;
  - 5.3.11. To record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to

accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;

**5.3.12.** To maintain the security of our digital channels and systems;

**5.3.13.** For audit and record-keeping purposes; and

**5.3.14.** For purposes of proof and legal proceedings.

## **6. Sharing your information**

**6.1.** The Company will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to the following entities:

**6.1.1.** Financial Product Providers and other third-party service providers who are involved in the delivery and/or administration of financial advice products and services and as required for the operational running of an authorized financial services provider

**6.2.** The Company will not sell, rent, or trade your personal information to any third party.

**6.3.** The Company will disclose information when lawfully required to do so:

**6.3.1.** To comply with any relevant legislation;

**6.3.2.** To comply with any legal process; and

**6.3.3.** By any regulatory authority (for example, the Financial Sector Conduct Authority or Prudential Authority).

## **7. Transfer across borders**

**7.1.** Some of the persons to whom we disclose your personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, we may send your personal information to service providers outside of the RSA for storage or processing on the Company's behalf.

**7.2.** However, we will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

## **8. Security and storage of information**

**8.1.** The Company intends to protect the integrity and confidentiality of your personal information. The Company has implemented appropriate technical and organisational information security measures to keep your information

secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

**8.2.** Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

**8.3.** Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

## **9. Right of access to information**

**9.1.** The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. This right can be exercised by contacting the Information Officer.

## **10. Correction of your information**

**10.1.** In accordance with POPIA, you have a right to correct any of your personal information held by the Company. This right should be exercised by contacting the Information Officer.

## **11. Objection to processing of your information**

**11.1.** In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

## **12. Children**

**12.1.** The Company is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

## **13. Particulars of the Company**

**13.1.** Should you have a complaint or concern regarding the processing of your personal information, your complaint may be submitted to [debbie@southsure.co.za](mailto:debbie@southsure.co.za).

**13.2.** The Company is an authorized financial services provider.

**13.3.** Our physical address is First Floor, Building F, 70 2<sup>nd</sup> Avenue, Newton Park, Port Elizabeth, 6045.

## **14. The Information Regulator**

- 14.1.** While we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)