

PRIVACY OF PERSONAL INFORMATION

Purpose:

The purpose of this notice is to inform clients about the type and use of personal information (referred to as PI) that we collect internally, the sharing, handling, protection and storage thereof.

What is PI:

PI relates to the information that we may use to identify you - the client, members of your family or your employer (if applicable)).

The Protection of Personal Information Act (referred to as POPI Act) defines PI as information relating to an identifiable, living natural person, or juristic person. Examples are race, gender, sex, marital status, nationality, ID Number, email address, physical address, telephone number, information relating to health.

Types of PI we collect:

PI collected by us can include your name, contact number, identity number, gender, employment details (Including Financial), marital status, family details, beneficiary details, bank account information, tax information and health information.

Why we collect PI:

Legislation (The Pension Fund Act (referred to as PFA), Insurance Act and the Income Tax Act (referred to as ITA)) requires that we receive certain identification and other details of members, belonging to them, in order to administrate their retirement benefits. This includes information to process death claims, transfers from one fund to another, communication to members from the trustees of the Fund, as well as information relating to your risk benefits (if applicable).

Legitimate bases relied upon:

We only process personal information when one of the following legitimate bases applies:

- Processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- Processing complies with an obligation imposed by law;
- Processing protects a legitimate interest of the data subject;
- Processing is necessary for pursuing legitimate interests;
- The data subject (or a competent person where the data subject is a child) consents to the processing.

How we collect PI:

We can either collect information from you directly, or indirectly from your employer or from other financial service providers that may hold such information.

Sharing PI:

We are committed to keeping your PI confidential, however circumstances may require us to share your PI with 3rd parties including but not limited to:

- any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime (eg. The Financial Intelligence Centre)
- any regulator or supervisory authority, including those in foreign jurisdictions, if required to do so in terms of applicable laws;(eg. The Pension Fund Adjudicator, the Financial Services Conduct Authority, South African Revenue Services)
- your financial advisor or risk provider to fulfil their contractual obligations

We will not give your PI to an unauthorised third party without your consent, or unless we are legally required to do so.

Storing / Protecting PI:

We are committed to keep accurate and complete information of our clients in a database that is protected from unauthorised access. In terms of the PFA and the ITA we are required to keep information history for periods that outlast the relationship we have with you. We comply with these statutory requirements.

All technology infrastructure, including cloud-based processing and storage adheres to all regulatory requirements, and has been deemed suitable for use. All our technology infrastructure adheres to our information security requirements.

Access to PI:

We regularly provide you with information from our database through benefit statements / Investor statements / direct electronic access.

Further, upon request, we will provide a full data export of all your data stored in our system. Please contact us on info@iretire.co.za to submit such a request.

Correctness / deletion:

Whilst we make every reasonable effort to ensure that the personal information processed is complete, accurate and not misleading, should you, through regular access to your information on our database, detect incorrect personal information, or any of your personal information have changed, or no longer be valid, please inform us or your employer of changes to be affected. Alternatively, Form 2 available on the website can be completed and submitted to admin@iretire.co.za

Prior authorisation required to process personal information:

We have not identified any instances in which we must obtain prior authorisation from the Information Regulator to process information as we do not process PI:

- for another reason than it was originally collected for,
- on criminal behaviour or on unlawful or objectionable conduct of a person on behalf of third parties,
- for the purposes of credit reporting, and
- we do not transfer special personal information or the personal information of children to a third party in a foreign country

Employee training:

Key employees involved in processing and handling personal information are provided with training to ensure the principles of POPIA are adhered to.

Notification of breaches:

We will notify you within a reasonable timeframe of becoming aware of any unauthorised use, disclosure or processing of your PI.

Information Officer:

Johan Potgieter

012 941 9927

Complaints / objections:

If you have a complaint about or objection against the way in which your PI is handled, please contact us on complaints@iretire.co.za in order to provide us with the opportunity to investigate the matter and provide you with our response within two (2) weeks.

Alternatively, Form 1 must be completed and submitted to complaints@iretire.co.za

Should you not be satisfied with the outcome, please contact the Information Regulator (South Africa) on inforeg@justice.gov.za