

Servisure Brokers

FSP 47659

Protection of Personal Information (POPI) Policy

1. Scope

The FAIS Act provides for the protection of personal information of Clients; and The Protection of Personal Information Act, 2013 (“POPIA”) provides for 8 Data protection Information principles to comply with to ensure the protection of all data that relates to companies, staff and Clients. The Promotion of Access to Information Act, 2 of 2000 provides for access to such information and in which instances it may be refused.

2. Purpose

- Servisure is an authorised financial services provider who is obliged to comply with the Protection of Personal Information Act (“POPI”).
- POPI requires Servisure to inform their clients as to how their Personal Information is used, disclosed and destroyed.
- Servisure guarantees its commitment to protecting their client’s privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- This Policy sets out how Servisure deals with their client’s Personal Information and in addition, for what purpose the said information is used. This Policy is made available by request from our offices.
- POPI states that “Personal Information may only be processed if - given the purpose for which it is processed - it is adequate, relevant and not excessive.

3. The POPIA Principles:

3.1 Accountability

Servisure must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in the business.

3.2 Processing limitation

Only necessary Information should be collected, directly from the person to whom the Personal Information relates and with their consent and the processing should be for a lawful purpose.

3.3 Purpose specification

Personal Information should be collected for a specific purpose and the Data Subject / Client must be made aware of the purpose for which it was collected.

3.4 Further processing limitation

Further processing of Personal Information must be compatible with the purpose for which the information was collected (as indicated in principle 3 above).

3.5 Information quality

Reasonable steps must be taken to ensure that all Information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected (as indicated in principle 3 above).

3.6 Openness

The Party collecting the Information must be transparent and inform the applicable regulator if it is going to process the Information and ensure that the Data Subject / Client has been made aware that his/her Information is going to be collected.

3.7 Security safeguards

The integrity of the Information under the control of a party, must be secured through technical and operational measures.

3.8 Data subject participation

Data Subjects / Clients have the right (free of charge) to request confirmation from the party that holds their Information on the details they hold, and may request for it to be amended/deleted.

4. The personal information collected

- Servisure collects and processes clients' Personal Information pertaining to the client's extended warranty needs, directly from the client. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the client what information they are required to provide us with and what information is optional.

Examples of the Personal Information we collect includes but is not limited to:

- Identifying number, e-mail address, physical address, telephone number, location information or other particular assignment to the client/policy holder;
- The name of the client/policy holder if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the client/policy holder.
- The date of purchase of the product/appliance. Serial number of the product/appliance and model number of product/appliance.
- We have agreements in place with all our products suppliers, insurers and third party service providers to ensure there is a mutual understanding with regard to the protection of client Personal Information. Our suppliers are subject to the same regulations as we are.
- We may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalised experience in clients' interaction with us.
- For purposes of this Policy, clients include potential and existing clients/policy holders.

5. How personal information is used

- Clients' Personal Information will only be used for the purpose for which it was collected and agreed. This may include:
 - Providing products or services to clients and to carry out the transactions requested;
 - For underwriting purposes;
 - Assessing and processing claims;
 - Confirming, verifying and updating clients' details;
 - For purposes of claims history;
 - For audit and record keeping purposes;
 - In connection with legal proceedings
 - Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
 - Providing communications in respect of Servisure and regulatory matters that may affect clients; and
 - In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- In terms of the provisions of POPI, Personal Information may only be processed if certain conditions are met, which are listed below, along with supporting information for Servisure processing of Personal Information:

- Client consents to the processing – consent only required where the information will be used for something other than the intended use for which the information is supplied by the client;
- The processing is necessary – in order to provide the client with the required insurance product;
- Processing complies with an obligation imposed by law on Servisure.
- Processing protects the legitimate interest of the client.
- Processing is necessary for pursuing the legitimate interest of Servisure or of a third party to whom information is supplied. In order to provide our clients with products we need certain personal information from clients to provide expert products.

6. Disclosure of personal information

- We may disclose clients' Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.
- We may also share client Personal Information with, and obtain information about clients from third parties for the reasons already discussed above.
- 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 is may be necessary to protect our rights.

7. Safeguarding client's information

- It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of a client's Personal Information. We will continuously review our security controls and processes to ensure that all personal Information is secure.
- When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that all Personal Information is kept secure.
- We may need to transfer a client's Personal Information to another country for processing or storage. We will ensure that anyone to whom we pass personal information agrees to treat all information with a similar level of protection as afforded to the client by us.

8. Access to and correction of personal information

- Clients have the right to access the Personal Information we hold about them. Clients also have the right to request that we update, correct or delete their Personal Information on reasonable grounds. Once a client objects to the processing of their Personal Information, Servisure may no longer process said Personal Information. We will take all reasonable steps

to confirm our clients' identity before providing details of their Personal Information or making changes to their personal Information

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

Information Officer Details

Marlon Reddy marlon@ssure.co.za

Head Office Details

Telephone Number: 011 794 2228

Fax Number: 11 794 1676

Physical Address: B4 Kimbult Office Park

Zeiss Road

Laser Park

Honeydew

2040

Email Address: info@ssure.co.za

Website: www.ssure.co.za

9. Review

This policy will be reviewed as and when required.