

## PROTECTION OF PERSONAL INFORMATION

*Privacy policy in term of the Protection of Personal Information Act 4, of 2013 (POPI)*



### 1. INTRODUCTION

The Protection of Personal Information Act 4 (2013) (POPI) aims to give effect to the constitutional right to privacy by balancing the right to privacy against that of access to information. POPI requires that personal information pertaining to individuals be processed lawfully and in a reasonable manner that does not infringe on the right to privacy.

This consent form sets out how personal information will be collected, used and protected by **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD**, as required by POPI.

The use of the words "the individual" for the purposes of this document shall be a reference to any individual communicating with **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** and/or concluding any agreement, registration or application, with the inclusion of everyone referred to or included in terms of such agreement, registration or application.

Voorpos takes cognizance of the importance of protecting a client's personal information and as such subscribes to the principles, outlined in Section 51 of the Electronic Communications and Transactions Act 2002, which governs the client's right to privacy of their personally identifiable information, as well as the Protection of Personal Information Act, 4 of 2013 (POPIA), which gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution.

POPIA deals with a client's constitutional right to privacy and the right to access of information (PAPIA). This includes how and why Voorpos collect, process, share, store and access information.

This Privacy Policy relates to the collection and use of personal information supplied by a client using any of our service channels and therefore governs how Voorpos collect and deal with a client's personal information.

The responsible use of the **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** any of Voorpos website(s) and related resources in respect of data privacy is important to us.

This Policy sets out the responsibilities and obligations of all persons who use, access or receive any form of information and communication from Voorpos via its electronic communication facilities and resources. This includes the Voorpos Short-Term Insurance Advisors website ([www.voorpos.co.za](http://www.voorpos.co.za)) and the Voorpos Group website ([www.voorposgroup.co.za](http://www.voorposgroup.co.za)), email and social

media platforms. This policy also sets out how all users of these facilities and resources are to ensure that when using these resources, they respect and process another's Personal Information lawfully and in accordance with the provisions of POPIA.

## **2. WHAT IS PERSONAL INFORMATION?**

The personal information that **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** requires relates to, but not limited, to names and surnames, birth dates, identity numbers, passport numbers, demographic information, education information, occupation information, health information, addresses, memberships, personal and work email and contact details.

We will not use your Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure or access.

Please note that we may review and update this Policy from time to time. Capitalised terms used in this Policy have the same meanings as ascribed thereto in Section 1 of the Act.

## **3. WHAT IS THE PURPOSE OF THE COLLECTION USE AND DISCLOSURE (PROCESSING) OF THE PERSONAL INFORMATION?**

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** is legally obligated to collect, use and disclose personal information for the purposes of:

- reporting to organizations, e.g., FSCA, SARS, CIPC and FIC
- Department Labour, Compensation Fund etc.
- evaluate and process applications
- compiling statistics and other research reports
- Provide personalized communications
- complying with the law
- All client information relating to accounting, products, and services in common
- All vendor information relating to accounting, products, and services in common
- Information stakeholders could be interested in BBEEE certification
- Insurance Sector Education and Training Authority (INSETA) learnership

## **4. HOW WILL VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD PROCESS PERSONAL INFORMATION?**

The Company will only collect personal information for the purpose stated above. Information will be collected in the following manner:

- direct from the individual
- from education institutions, training providers, or other service providers that are providing or provided the individual with services
- from our own records relating to our previous supply of services or responses to the individual's request for services; and
- from a relevant public or equivalent entity

## **5. TO WHOM WILL PERSONAL INFORMATION BE DISCLOSED?**

The personal information may be disclosed to other relevant public or other entities on whose behalf we act as intermediaries, other third parties referred to above in relation to the purpose or who are sources of personal information,

In addition to the above, we may create Personal Information about you such as records of your communications and interactions with us, including, but not limited to, your attendance at events, subscription to our newsletters and other mailings and interactions with you during our digital marketing campaigns.

We will not intentionally collect and process the Personal Information of a child unless we have the permission of a Competent Person.

As a rule, **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** / Voorpos does not disclose personal information about our clients or former clients to anyone. However, to the extent permitted by law and any applicable Code of Professional Conduct, certain non-public information about a client or their organisation may be disclosed.

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** / Voorpos does not and will not sell or provide personal information to third parties for independent use. The Company /Voorpos may, however, share personal information with our business partners, Fiduciary Regulators, if that information is required to provide the product or service a client has requested. However, Voorpos business partners must adhere to using client information only as directed by **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD**.

In order to deliver our services, which include providing quotations, assessing risks fairly, renewing or comparing policies, assessing and processing claims, preventing fraud, conducting surveys and communicating important information, we will share a client's personal information with other insurers, industry bodies, credit agencies and service providers. This includes information about a client's insurance, previous and existing policies, claims ratios and history, and premium payments.

The following list includes but is not limited to some of the instances where **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** disclose the personal information obtained from a client:

- When any regulatory authority for the various financial sectors requests the same.
- To comply with any regulation passed under relevant legislation, or any legal process.
- To enforce and protect our rights and property (including intellectual property) and/or where we have a legitimate interest to do so.
- When a client has expressly authorised us to do so; or
- If we undergo a change in ownership.

## **6. DISCLOSURE OF PERSONAL INFORMATION TO 3<sup>RD</sup> PARTIES**

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** does not sell or trade any Personal Information collected. However, we may share some of the Personal Information we collect with our related corporations and service providers, contractors who help us provide services, or trading partners. We often need to share your Personal Information with Operators who perform parts of our service delivery.

This may include:

- Service providers e.g.
- IT services, mailing services, contractors, data analysis.
- Regulatory authorities.
- Professional advisors / paraplanners and any other third party required by law.

Where we share your Personal Information with Operators, Business Advisory Services will strive to ensure that these third parties protect your privacy in accordance with POPIA.

## 7. DATA SECURITY

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** do implement appropriate technical and organisational security measures to protect your Personal Information that is in our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law.

Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, we will notify you and the relevant regulator, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

Due to the fact the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Information that is in our possession, we cannot guarantee the security of any information transmitted using the internet and we cannot be held liable for any loss of privacy occurring during such transmission.

## 8. SECURITY & PROTECTION OF INFORMATION

We value the information that you choose to provide us and will therefore take reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. The information we maintain concerning our customers is stored in databases that have built-in safeguards to ensure the privacy and confidentiality of that information.

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** uses state of the art technology and encryption to prevent any unauthorised access to a client's personal information. Voorpos keep apprised with the latest developments in security technology to ensure that a client's transactions with Voorpos are adequately secured and always protected.

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** maintain physical, electronic, and procedural safeguards to guard a client's personal information. In doing so, we restrict access to a client's personal information to Voorpos employees who require the information to provide a service to a client, as well as the support service companies, and financial services providers mentioned above. The institutions are also legally and contractually bound to maintain the privacy of the information shared with them.

A Client must always keep their personal information and any account numbers or app login details secret and ensure that they do not disclose it to anyone.

Should a client at any time feel that they no longer wish to be contacted by Voorpos, the client should advise Voorpos to that effect in writing. Voorpos retain all data that is required for **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** to discharge Voorpos business activities for an indefinite period for historical, statistical and research purposes. Voorpos have established appropriate safeguards against the records being used for any other purposes.

## 9. DATA ACCURACY

The Personal Information provided to **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** should be accurate, complete, and up to date. Should Personal Information change, the onus is on the provider of such data to notify **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** of the change and provide **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** with the accurate data.

To effectively meet our clients' insurance needs, and as required by insurance and other legislation, we must collect and process certain personal information about a client and/or their business to provide them with our products and services, based on a client's own risk profile and to ensure that we have the correct and most up-to-date information. However, this is only collected when the information is provided by a client or authorised to be obtained on their behalf.

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** /Voorpos has the highest regard for the privacy of its employees, customers and will use personal information only to the extent required in the normal course of business and to provide the products and services agreed upon or request by a client. Sources where we collect and store this information include:

- Insurers and related financial services providers.
- Voorpos practice management system.
- Meetings or phone calls with a client.
- Letters or emails from and to a client.
- Insurance policies provided by a client.

Voorpos will also use this information to positively identify a client when they contact us or refer back to it in the event of a client dispute or prompted by the regulator(s).

## **10. DATA MINIMIZATION**

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

## **11. DATA RETENTION**

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** shall only retain and store Personal Information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

## **12. CLIENT'S RECEIVING COMMUNICATION FROM VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD**

We will not use a client's personal information to send them any information about products or offers from **VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD/** Voorpos Group or its subsidiaries unless they explicitly give us consent to do so. However, Voorpos will send our clients communication relating to their products, or our service to them for product knowledge, maintenance, renewal, and reminders.

## **13. COOKIES AND SIMILAR TECHNOLOGIES**

**VOORPOS SHORT-TERM INSURANCE ADVISORS (PTY) LTD** may Process your Personal Information by our use of cookies and similar technologies.

Cookies are small software programs that install themselves on your computer or your mobile device. They store data specific to a particular user and remember your preferences about our website. Cookies are stored on your computer or mobile device for various lengths of time. Every time you return to our website and browse it, cookies record this data, which is then transmitted to us or to third parties with whom we work.

When you visit our website, we may place cookies onto your device, or read cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Information through cookies and similar technologies.

#### **14. DIRECT MARKETING THROUGH VARIOUS SOCIAL MEDIA PLATFORMS**

We may Process your Personal Information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.

#### **15. YOUR PLEDGE TO VOORPOS SHORT-TERM INSURANCE ADVISORS' CLIENTS & SUPPLIERS**

At Voorpos, we have the highest regard for the confidentiality of a client's or suppliers' personal information and the security of their privacy. We will therefore protect their personal information as if it were our own. We pledge to use it responsibly, and to continue offering our service in such a manner as to maintain a client's trust and confidence in me.