



PRIVACY POLICY

in relation with the Protection of Personal Information Act 4 of 2013

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1. Introduction:

- 1.1. **B-Sure Brokers** ("the Company") is an authorised financial services provider whose business includes the collection of Personal Information from its clients, suppliers and employees (Data Subjects). The Company endeavours to comply with all the relevant legislation and regulations relating to the protection of Personal Information.
- 1.2. The Company is committed to protecting and respecting your privacy, and wish to be transparent on how they process personal information and that they are accountable with the Protection of Personal Information Act in relation to not only processing the personal information but ensuring that all clients, suppliers and employees understand their rights thereto.
- 1.3. This Privacy Policy (the "Policy") documents and records the principles and policies the Company follows when collecting and Processing Personal Information, describes the required business activities relating to Personal Information Processing and specifies the responsibilities of the Company when complying with the relevant legislation and regulations.
- 1.4. The Company acknowledges that it must comply with South African legislation, in the form of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013) ("POPIA") as it Processes Personal Information in South Africa.
- 1.5. In compliance with the Protection of Personal Information Act 4 of 2013, the Company commits to processing the personal information of Data Subjects lawfully and in a reasonable manner which does not infringe the privacy of any such person and according to requirements of applicable legislation.

2. Who is the Company:

- 2.1. The Company is an authorised financial service provider who is situated in Klerksdorp, in the heart of the North West Province. The Company has rendered top quality service and being leaders in the short term industry. The slogan of the Company "We've grown through caring" has always been the credo of the director Ben Havenga. The Company's growth through the years is proof of personal service and customer care.
- 2.2. The Company is set out to build lifelong relationships, securing assets and ensuring any service provided is tailor made to each clients' needs. The Company further strives to be in

the best position to assist suppliers and to ensure lawful processing of personal information of their employees.

- 2.3. In order for the Company to provide the best service to its clients and/or to assist the suppliers in the best possible way, they need to obtain personal information as stipulated in clause 4.
- 2.4. This Privacy Policy applies to current, past or prospective clients, suppliers and employees. Furthermore this Privacy Policy also applies to any third party information which was supplied by the Data Subject to the Company.

3. How does the Company Collect Personal Information:

- 3.1. When a client requires the service of the Company, a supplier needs to render a service to the Company, and/or if the Company and the employee enters into an employment relationship the Company will collect personal information directly from the Data Subjects.
- 3.2. The Company will process personal information for only the purpose it was collected for and for which consent was given.
- 3.3. The Company may collect further personal information through email correspondence, personal meetings, telephone calls and in general dealings with the Data Subjects.
- 3.4. The Company may collect personal information about the Data Subjects from third parties, if necessary and required to perform a service as requested.
- 3.5. By requesting the Company to deliver a service, and or engaging with the Company currently the Data Subject has consented to the collection and processing of personal information and any further collection necessary to fulfil the business purpose.

4. What Personal Information is Required for Processing and to Deliver a Service:

- 4.1. The Company requires the following types of Personal Information from the clients in order to be able to deliver a service:
 - 4.1.1. Individual details / Personal information of Data Subject:
 - 4.1.1.1. Name and Surname,
 - 4.1.1.2. Identification document,
 - 4.1.1.3. Address (proof of residential address),
 - 4.1.1.4. Gender,
 - 4.1.1.5. Marital Status,
 - 4.1.1.6. Nationality,
 - 4.1.1.7. Health information,
 - 4.1.1.8. Employer,
 - 4.1.1.9. Job title, and
 - 4.1.1.10. Family details, including their relationship to the client or employee.

4.1.2. Business operating address;

4.1.3. South African Income Tax registration number;

4.1.4. South African VAT registration number (if applicable per individual/legal entity);

4.1.5. Contact Details:

4.1.5.1. Email address,

4.1.5.2. Telephone numbers, and

4.1.5.3. Fax number.

4.1.6. Financial details:

4.1.6.1. Banking details, and

4.1.6.2. Full details on assets.

4.1.7. Information regarding a claim;

4.1.8. Information regarding policies they client has taken.

4.1.9. Any other information that may be requested from the Data Subject, if required.

5. Whether Providing of Personal Information is Voluntary or Compulsory and the Consequences if Personal Information is not Provided:

- 5.1. To fulfil the business purpose or required service that needs to be delivered, the Company is required to collect the personal information of Data Subjects, as set out above.
- 5.2. Providing personal information as required in clause 4 above is compulsory. The Company can decline to transact with any person who refuses to comply with the requirements of Legislation and / or to submit the information necessary to provide a quotation and deliver a service tailor made to each person's needs.
- 5.3. Providing information not specifically required by Legislation and/or the company as compulsory is voluntary. However, the Company reserves the right to decline to transact with any person who fails to provide any information which it has requested from that person and which the Company deems essential, in its sole discretion.

6. How does the Company Store and Manage Personal Information?

- 6.1. The Company may store personal information electronically and/or physically.
- 6.2. The Company will endeavour to take reasonable and appropriate measures to keep such information secure. For example, the Company's server is password protected, its Microsoft software is regularly updated, it maintains anti-virus and anti-malware software, and its

buildings are locked and alarm protected afterhours. However, it cannot guarantee the absolute security of personal information.

- 6.3. By transacting with the Company or attempting or proposing to transact with the Company in any way, you consent to the storage and management of personal information described in this Privacy Policy and any further storage and management necessary to fulfil the business purpose.

7. Purposing for Collecting of Personal Information?

- 7.1. As described above, the Company uses the personal information which it collects to fulfil the business purpose, that is:

7.1.1. To comply with Legislation;

7.1.2. To grow and safeguard its business and improve the excellence of the services offered by the Company.

- 7.2. To carry out the business purpose, the Company's owners, managers and employees need to review, consider, verify and discuss the personal information collected by it.

- 7.3. Where required by law, some or all of the personal information collected by the Company may be disclosed to the governmental authority or regulatory body.

- 7.4. The Company process Personal Information:

7.4.1. To give the client information on and provide him/her with recommended financial products.

7.4.2. To disclose data to policyholder, life assured, beneficiary, trustee, assignee, successors, other suppliers and/or to other parties.

- 7.5. The Company will also use the personal information collected by it to conduct its business, including the provision of services, marketing and billing.

- 7.6. By transacting with the Company, or attempting or proposing to transact with the Company in any way, you consent to the use of personal information described in this Privacy Policy and any further use necessary to fulfil the business purpose.

8. How long does the Company Keep the Personal Information for?

- 8.1. The Company will retain personal information for the period prescribed in the Legislation and for the purpose it is required for.

- 8.2. Personal information must be stored for no longer than necessary for the purposes for which it is processed.

- 8.3. The Company must keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to applicable legislation and/or requirements of the company. After this period, your Personal Information will be irreversibly destroyed
- 8.4. The Company also stores and processes personal information for so long as the Company maintains a business relationship or contact with such Data Subject, and for at least five years thereafter. This is a general rule applied by the Company to:
- 8.4.1. Ensure that it maintains personal information of all Subjects who could benefit from the Company's services; and
- 8.4.2. Carry out good record-keeping practices, in case the details of any transaction are queried by a Data Subject, governmental authority or regulatory body.
- 8.5. By transacting with the Company, or attempting or proposing to transact with the Company in any way, you consent to the length of time for which the Company keeps their personal information.

9. Subjects' Rights to Deal with their Personal Information:

- 9.1. The Company views itself as the temporary custodian of personal information which is entrusted to the Company and curated by the Company to fulfil the business purpose. Each Data Subject has the right to:
- 9.1.1. **Withdraw any of the consents given** to the Company in relation to the processing of their personal information (however, the Company may continue to process the personal information to the extent necessary to implement a contract with the Data Subject, or to protect the legitimate interests of the Data Subject, or to protect the legitimate interests of the Company, or to comply with any legal obligation);
- 9.1.2. **Ask the Company to reveal what personal information the Company has** relating to the Subject and who has had access to that information (in which case the Company will respond as soon as reasonably practicable);
- 9.1.3. **Ask the Company to correct or delete any of their personal information**, which is inaccurate, irrelevant, out of date, incomplete or misleading (in which case the Company will respond by altering its records, or substantiating its records, as appropriate, as soon as reasonably practicable), provided that the Data Subject will, on request, provide all such correct and accurate personal information as may be required;
- 9.1.4. **Ask the Company to destroy or delete any of their personal information** if it is no longer lawful for the Company to retain it (in which case the Company will respond as soon as reasonably practicable, allowing time for the Company to seek legal advice if necessary);

9.1.5. **Object to the Company processing any of their personal information** where the processing is:

9.1.5.1. Not covered by consent; or

9.1.5.2. Not necessary for carrying out a contract between the Company and for service delivery from the Company; or

9.1.5.3. Not necessary to discharge a legal obligation of the Company,

and the Data Subject has reasonable grounds for objection (in which case the Company must cease processing the personal information);

9.1.6. **Object to the Company processing any of their personal information to prevent any direct marketing by the Company** to the Data Subject (in which case the Company must cease processing the personal information for this purpose);

9.1.7. **Lodge a complaint** to the Information Regulator at:

9.1.7.1. Physical Address:

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

9.1.7.2. Postal Address:

**PO Box 31533
Braamfontein, Johannesburg, 2017**

9.1.7.3. Tel:

010 023 5207

9.1.7.4. Email:

complaints.IR@justice.gov.za / infoereg@justice.gov.za.

9.2. The Company is a private company registered with CIPC as **B-Sure Brokers with registration number 2000/026065/07**. The Company's registered address is **6 Michael Street, Wilkoppies, Klerksdorp**.

9.3. Within the Company's structure, the collection and processing of Data Subjects' personal information is managed by **Lodus Havenga**, who is also the Company's Information Officer. For all requests relating to the processing of personal information, the Information Officer may be contacted at:

9.3.1. Email:

info@bsure.cc

9.3.2. Tel:

018 482 9155

10. Security Measures:

- 10.1. The storage and transfer of Personal Information will occur in a secure environment.
- 10.2. The Company will ensure that a risk assessment is completed to identify all reasonably foreseeable internal and external risks to Personal Information under its control.
- 10.3. Technical measures will be utilised to secure Personal Information, and such measures may consist of De-identification or Encryption.
- 10.4. The Company will ensure that the Information Regulator is notified of any data breaches as soon as reasonably possible and notify all Data Subjects affected by such breaches.

11. Responsibilities of the Company:

- 11.1. The Company is the Responsible Party, and is committed to accountability, transparency and consensual and responsible Processing of Personal Information.
- 11.2. The Company intends that this Policy will protect a Data Subject's Personal Information from being compromised in any way, and this Policy is consistent with the privacy laws applicable in South Africa.
- 11.3. The board of directors of the Company is responsible for approving this Policy, and the Information Officer is responsible for managing and implementing the Personal Information protection processes.
- 11.4. The Company's Information Officer will monitor Personal Information protection regulation to ensure that all developments are incorporated into the Company's business activities.

12. Contact Details of the Information Officer:

- 12.1. Any questions relating to the Company's Privacy Policy or the treatment of an individual's Personal Information should be addressed to the Information Officer, whose contact details are:

Information Officer: Lodus Havenga
Telephone number: 018 462 9155
Postal address: PO Box 11409, Klerksdorp, 2570
Physical Address: 6 Michael Street, Wilkoppies Klerksdorp
E-mail address: info@bsure.cc