

## PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPIA”)

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer's Contact Details	
Name	Ashree Christian
Contact Number	083 448 2308
Email Address:	ashree@personalcapital.co.za

**Our details:** Personal Capital Insurance Brokers (Pty) Ltd

Unit C18, Pinelands Business Park, 4 New Mill Road, Pinelands, Cape Town. 7405

Telephone Number: 021 531 1784

Organisation E-mail address: ashree@personalcapital.co.za

The Organisation is an authorised financial services provider with FSP nr 45160. We render financial services in the following product categories:

Category Description	Advice Automated	Advice Non-automated	Intermediary Scripted	Intermediary Other
CATEGORY I				
Long-Term Insurance subcategory A		X		X
Short-Term Insurance Personal Lines		X		X
Long-Term Insurance subcategory B1		X		X
Long-term insurance subcategory B2		X		X
Long-term Insurance subcategory B2-A		X		X
Long-term Insurance subcategory B1-A		X		X
Short-term Insurance Personal Lines A1		X		X
Long-Term Insurance subcategory C		X		X
Retail Pension Benefits		X		X
Short-Term Insurance Commercial Lines		X		X
Pension Funds Benefits		X		X
Shares		X		X
Money market instruments		X		X
Debentures and securitised debt		X		X
Warrants, certificates and other instruments		X		X
Bonds		X		X
Derivative instruments		X		X
Participatory interests in a collective investment scheme		X		X
Long-term Deposits		X		X
Short-term Deposits		X		X
Friendly Society Benefits		X		X

**The source of collection of your personal information:**

We collect personal information directly from the following data subjects:

- Prospective clients who enquire about our financial services
- Clients who have appointed the representative as their broker
- Policyholders who enter into a policy with an insurer via the Organisation

Personal information is collected directly/ indirectly from you telephonically, via email, WhatsApp, our website or through our Facebook page. These forms are completed either electronically or in hard copy. You may also be requested to provide your personal information during your consultation with a representative.

We may also collect information about you from other sources such as external third parties and from cookies on our website.

**Law authorising or requiring collecting of the personal information:**

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Insurance Act 18 of 2017;
- Short-Term Insurance Act 53 of 1998;
- Long-Term Insurance Act 52 of 1998;

**Purpose of Processing your Information:**

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the service level agreement concluded between yourself and the FSP
- Providing you with advice, products and services that suit your needs in regards to Risk, Investment , Wills and Short Term insurance
- To verify your identity and to conduct credit reference searches
- To issue, administer and manage your insurance policies, investments and Last Will and Testament
- To process insurance claims and to take recovery action
- To notify you of new products or developments that may be of interest to you
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements that apply to us as Financial Advisors

Some of your information that we hold may include the following:

Any information that can be used to reveal your identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

- the views or opinions of another individual about the person;
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Some of the aforementioned personal information may be mandatory to provide within the context of product providers' underwriting requirements and disclosures.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider.

### **Third parties and your personal information**

We may need to share your information to third parties provide advice, reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- Your employer (where applicable and with your consent);
- The Compliance Officer of the organisation (where applicable);
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority;
- If you have entered into a Short-Term Insurance either Personal Cover Policy or Commercial Lines Policy, the Organisation may share your information as part of its statutory and reporting obligations with:
  - Personal Capital Insurance Brokers, who in turn will provide you with quotes from different service providers and analysis of the quotes and cover.
- We will also share your information with some or all of the following service providers in terms of your Risk, Investments, Health Services, and Wills:

#### Short Term Insurance Service Providers:

##### 1. Personal Lines:

- Discovery Insure
- Momentum
- Auto and General
- First for Women
- King Price
- Hollard Easy
- Unity
- MUA
- Broker Solutions Group – Renasa, Bryte, Hollard and Old Mutual Insure
- Brolink – Bryte and Santam
- Versma – King Price, Santam, Auto and General, Discovery, Old Mutual
- CIA

##### 2. Commercial/Business Lines

- Discovery Business Insure
- Momentum
- MUA
- CIA Building Insurance
- Versma – Discovery, Hollard, AC & E, CTU

- Broker Solutions Group – Renasa, Hollard, Santam
- Brolink - Santam

Wills:

- Capital Legacy

Our short term service providers will use your information to provide us with quotes. However, and ITC check will be performed for every quote done.

**Complaints and objections**

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed (please complete Annexure A);
- Request that we consider your objections to the processing of your personal information (please complete Annexure B);
- Lodge a complaint with the Information Regulator (please complete Annexure B).

**The Information Regulator**

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

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

Website: <https://www.justice.gov.za/inforeg/index.html>