

# Privacy Notice

This **Privacy Notice / Statement** explains how we, **A S BROKERS CC** process (collect, use, retain, transmit or delete) and share your personal information, as is required by the Protection of Personal Information Act no. 4 of 2013 ("POPIA").

At **A S BROKERS CC**, we are committed to protecting your privacy and to ensure that your personal information is processed, lawfully and transparently.

## **This Notice sets out:**

- Who we are,
- What information we collect from you and how we collect the information (methods of collection),
- How we use your information,
- Our aim to provide ongoing financial services (advice, intermediary and administrative services),
- To whom we disclose or share your information,
- How we retain (store) and safeguard your information (information security),
- Your personal information protection (privacy) rights,
- How our website functions,
- Changes to this Notice,
- How to contact us, and
- Forms provided by the POPIA Regulations for Objection and Request for Correction or Deletion of Personal Information

## **WHO WE ARE:**

In this Notice, "**A S BROKERS CC**-" or "we" refers to our Close Corporation / Company / Sole Proprietor which operates as an authorized Financial Services Provider with license number: **FSP No: 17273**. **We are authorized to provide financial advice and intermediary services with regards to the following financial products:**

Category Description	Advice Automated	Advice Non-automated	Intermediary Scripted	Intermediary Other
<b>CATEGORY I</b>				
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
Participatory interests in a collective investment scheme		X		X
Long-term Deposits		X		X
Short-term Deposits		X		X

## **THE INFORMATION WE COLLECT AND THE METHODS OF COLLECTION**

We collect and process your personal information mainly to provide you with access to our services and products (and all other activities and processes incidental thereto), to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used (processed). We will only collect information that we need for that specific purpose.

**Examples of the personal information that we collect are as follows (but it is not limited to the examples provided):**

Some of your information that we hold may include, your first and last name, identity number, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, marital status, details of a driving license, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, insurance (including previous insurance and claims experience), income, expenditure, family history, medical information, telephone recordings of conversations, emails, your banking details, premiums paid and information relating to claims and other investigations (including reports and photos).

We collect information **directly from you**, where you provide us with your personal details, for example when you purchase a product or services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

**We also collect information about you from other sources as explained below.**

With your consent, we may also supplement the information that you provide to us with information we receive from other companies such as Product Providers or other Financial Services Providers, in order to offer you a more consistent and personalized experience in your interactions with us.

The examples of Collection are summarized below (but it is not limited to the examples provided) -

- Our computer systems,
- Our website,
- Insurance, Investment, Customer Due Diligence and other Proposal and Application Forms,
- Previous and current Insurance, Investment or other Policies or Schedules (provided via Astute with your consent or by you directly),
- Claim Forms
- Telephone Calls,
- Emails,
- Credit Reference Agency via the relevant Product Provider/s,
- Business Partners such as Product Providers, Assessors, Brokers etc.
- Social Media Platforms such as What's Up, Face Book etc.

**HOW WE USE YOUR INFORMATION**

We will use your personal information only for the purposes for which it was collected or agreed with you, note examples below (but it is not limited to the examples provided):

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship,
- For underwriting purposes,
- To assess and process claims and to take recovery action,
- For collection of premiums via Collection Agencies
- To conduct credit reference searches or verification (including credit scoring, assessment and management)
- To confirm and verify your identity for security purposes and update your details,
- To perform customer due diligence or enhanced customer due diligence processes as required by the money laundering and terrorist financing legislative framework.
- For operational purposes, and where applicable, credit scoring and assessment and credit management,
- For purposes of claim checks,
- For the detection and prevention of fraud, crime, money laundering or other malpractice,
- For debt tracing or debt recovery,
- To conduct market or customer satisfaction research or for statistical analysis,
- Resolving complaints,
- For audit and record keeping purposes, and
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

We will only transfer your personal information outside the borders of South Africa with your consent and where the privacy legislation is of a high standard. We do not use your personal information for marketing purposes without your consent.

**ONGOING FINANCIAL SERVICES**

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

You may also give and withdraw consent and tell us what your communication preferences are.

**DISCLOSURE / SHARING OF INFORMATION**

We do not and will not sell personal information to a third party. We may disclose your personal information to our service or product providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

**We may share your personal information with, and obtain information about you from (read with examples of collection):**

- Third parties for the purposes listed above, for example contracted product providers or insurers, astute, credit reference and fraud prevention agencies, law enforcement agencies, banks etc.,
- Other insurers to prevent fraudulent claims,
- Other companies (as mentioned above) when we believe it will enhance the services and products, we can offer to you, but only where you have not objected to such sharing,
- Other third parties from whom you have chosen to receive marketing information.
- Third parties or services providers such as IT providers, system administrators, collection agencies etc. that enables us to operate as a Close Corporation, a Financial Services Provider and an Accountable or Non-Accountable Institution.

**We may also disclose your information:**

- Where we have a duty or a right to disclose in terms of law or industry codes (Regulators, Compliance Officers, Auditors etc.),
- Where we believe it is necessary to protect your and our own rights.

Where we outsource any processes, we ensure that our service providers have appropriate security measures in place. All third parties are obliged to keep your personal information strictly confidential.

**STORAGE OF INFORMATION AND INFORMATION SECURITY (SAFEGUARDING)**

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an ongoing basis, continue to review our security and risk management controls and related processes to ensure that your personal information is secure.

**Our risk management (security) policies and procedures cover:**

- Physical security,
- Computer and network security,
- Access to personal information,
- Secure communications,
- Security in contracting out activities or functions,
- Retention and disposal of information,
- Acceptable usage of personal information,
- Governance and regulatory issues,
- Monitoring access and usage of private information,
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them (our confidentiality agreements) to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

Personal Information is securely stored on administrative systems, computer systems, servers (in and outside South Africa), laptops, filing cabinets and one drive (cloud).

Your personal information is stored for a minimum of five years after the cancellation or termination of the transaction or business relationship in accordance with applicable legislation. We will take reasonable steps to destroy or de-identify your personal information when the law no longer requires us to retain or keep it.

**YOUR PERSONAL INFORMATION PROTECTION RIGHTS**

**Every person whose personal information we process has the following rights:**

- You have the right to request copies of your personal information, subject to the terms and conditions described in our Promotion of Access to Information (“PAIA”) manual and our POPIA Policy which is available on request.
- You have the right to request that we correct any information you believe is inaccurate,
- You have the right to request that we erase your personal information, under certain conditions,
- You have the right to object to us processing your personal information, under certain conditions
- You have the right to lodge a complaint with the Information Regulator whose contact details is in our PAIA Manual and POPIA Policy.

If you wish to object to the processing of personal information or if you wish to request for correction or deletion of personal information, then please complete Form 1 or Form 2 at the end of this privacy notice.

### **HOW OUR WEBSITE FUNCTIONS**

The following shall apply to online collection, use, maintenance, and disclosure (processing) of information (including personal information) collected from any User of the A S Brokers website. We take the privacy of all Users seriously and does not share this information with third parties except to the extent necessary to provide the relevant services as already explained in this privacy notice.

#### **What information is gathered via our website?**

Not all information requested, collected and/or processed by A S Brokers falls within the definition of "personal information" as it does not identify the User as a specific natural person. We may collect non-personal identification information concerning Users, via Google Analytics, whenever they interact with the A S Brokers website. Non-personal identification information may include the browser name, the type of computer and technical information concerning the Users' means of connection to our website, such as the operating system and the internet service providers utilized and other similar information.

A S Brokers does not collect any personal information from Users who visit our website purely to READ information concerning our services, but we do collect personal information concerning Users in order to provide services and customer support. Our services and customer support are provided through many platforms including but not limited to; our website, “facebook”, emails, and telephone calls as explained in the previous paragraphs. The specific platform and product, service and/or support a User interacts with, may influence the nature and extent of the personal data collected.

Personal information is gathered from Users, via our website, when they make an enquiry, request to be provided with a quotation or ask for assistance with a claim. Note detailed explanations provided previously with regard to what information is collected or gathered and for what purpose/s it is used or processed. Again, we would like to confirm that we will only gather personal information from Users if they voluntarily submit such information. Users will always have the option of refusing to supply personal information, except that, in such event, it may prevent them from engaging in certain website related activities.

#### **What is done with the information gathered via our website?**

In addition to the information already provided in this regard, we will also gather or use Users personal information for the following purposes, related to our website:

- To improve customer services,
- To personalize the User's experience,
- To understand how Users, as a group, use the services and resources provided on our website,
- To improve our website (based on the information and feedback received from Users)

#### **Security of information provided via our website**

A S Brokers CC adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure and/or destruction of personal information. We store all the personal information Users provide, via our website, on its secure (password and firewall protected) servers. This notwithstanding, Users of the 'A S Brokers website acknowledge and accept that data transmission over the internet is inherently insecure, and that A S Brokers cannot guarantee the security of such data. If our website security is compromised, every effort will be made to notify Users of the situation and how this may affect the confidentiality of any personal information.

#### **Contact and other Forms**

Information submitted through the contact and other forms on our website are sent to an email which is directly linked to A S Brokers .

#### **Cookies**

A S Brokers CC website may use “cookies” to enhance the experience of Users of its website. A User's web browser may place cookies on such User's hard drive for record-keeping purposes and sometimes for the purposes of tracking information. Users may elect to set their web browser to refuse cookies. If they do so, it is to be noted that certain functions of our website may not perform properly.

As mentioned previously, Google Analytics is used to analyze website visits, to track which pages are visited and gather other general statistics provided by them. This is done with a view to improve the website's content and the general experience of Users. The Google Analytics' information is anonymous.

**Management of Information**

A S Brokers CC protects customer data, using SSL/HTTPS throughout its website. This encrypts User communications with the servers so that personal information is never captured by third parties without authorization.

As mentioned previously, Users can also request that A S Brokers CC erases any personal data held by it. This does not include any data that we are obliged to keep for administrative, legal and/or security purposes. However, we cannot erase basic account information such as an email address.

**Objecting to the processing of data for advertising purposes**

As discussed, Users have the right to object at any time to the processing of personal data for direct marketing purposes. If a User objects, A S Brokers CC will no longer process such personal data. Objections must be addressed to our Deputy Information Officer. His / Her details are provided below.

**Business contact via our website**

If a User is a business contact that has provided A S Brokers CC with personal data, we will store such personal data in our database so that it is able to follow up on previous business conversations held with the User, provide additional information to the User concerning our services and/or assist the User in related services.

**Email / direct mail campaign data**

From time to time A S Brokers CC may contact its clients (Users) directly by mail, email, or telephone to provide information concerning new products and services. We will, however, not contact a User with any commercial communications that are unrelated to the services provided by A S Brokers CC. When responding to one of these campaigns, Users may elect to provide us with personal information which will be used for the purpose indicated.

**Survey data**

From time to time, we may conduct surveys in respect of our service delivery. Participation in these surveys is optional. If, however, Users respond to one of the surveys, Users may elect to provide A S Brokers CC with personal information. Unless a User otherwise consents, we will only use the information to determine the type/s of services that may be of interest to the User and to operate and improve its service offerings.

**Policy amendments**

We may amend and/or update these standard terms and conditions at any time. Users are encouraged to frequently check our website for the purposes of familiarizing themselves with these standard terms and conditions, particularly in so far as they relate to the protection of personal information. Users acknowledge and agree that it is their responsibility to review these standard terms and conditions periodically and become aware of any amendments and/or updates.

**Sale of business**

In the event of a change in control of A S Brokers CC (is acquired by another company), or preliminary discussions to that end, the personal data of Users may be included in order that the acquirer may continue to effectively serve both Users and clients.

**Acceptance of standard terms and conditions**

By using A S Brokers CC website, the User signifies acceptance of these standard terms and conditions. If a User does not agree to these terms and conditions, he / she is advised not to use our website. The continued use of the website by Users following the posting of updates and/or amendments to these standard terms and conditions will be deemed to be an acceptance by such User of such updates and/or amendments.

**Contacting Us**

If a User has any questions concerning these standard terms and conditions and / or the practices and / or dealings of A S Brokers CC website, kindly contact our Deputy Information Officer. His / Her details are provided below.

**THE PROVISIONS OF THE PROTECTION OF PERSONAL INFORMATION ACT AND SUPPORTING LEGISLATION:**

Please be advised that this Notice must be read together with the aforementioned Act and its Regulations and that any omissions should not be construed as a waiver by our company (A S Brokers CC) and that any omission will be dealt with in terms of the provisions of the Act and supporting legislation.

**CHANGES TO THIS NOTICE**

Please note that we may amend this Notice from time to time.

**HOW TO CONTACT US**

If you have questions about this Notice or believe we have not adhered to it or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following numbers/addresses. We will also provide you with copies of our PAIA Manual and POPIA Policy:

- **The Information Officer and / or Deputy Information Officer: Elize Schuurman / Monique Schuurman**
- Address: 226 Voortrekker rd, Monument, Krugersdorp, 1739
- Telephone Number: 011 954 6641
- Email Address: elize@asbrokers.co.za

**FORMS PROVIDED BY THE POPIA REGULATIONS FOR OBJECTION AND REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION**

As indicated above, you may object to the processing and sharing of your personal information as well as request the correction or deletion of your personal information. Note below, Forms 1 and 2 that can be used for this purpose.

**LAST UPDATE OF PRIVACY NOTICE AND SIGN OFF**

- 26 April 2021, signed off by all Directors / Members / Sole Proprietor.
- Notice is reviewed annually.
- We will publish any future versions on our website: [www.asbrokers.co.za](http://www.asbrokers.co.za)

**Forms 1 and 2** (follows on next pages)

**FORM 1**  
**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE**  
**PROTECTION OF PERSONAL INFORMATION ACT,**  
**2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
**[Regulation 2]**

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number	
Residential, postal or business address: Contact number(s):	
	Code (        )
Contact number(s)	
Fax number / E-Mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
Residential, postal or business address: Contact Number(s)	
	Code (        )
Fax number / E-Mail address:	
C	REASONS FOR OBJECTION INTERMS OF SECTION 11 (1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at ..... this ..... Day of ..... 20.....

.....  
 Signature of data subject / designated person

## FORM 2

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR  
DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE  
THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION 2018  
[Regulation 3]**

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

**Request for:**

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number	
Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number / E-Mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
	Code (      )
Contact Number(s)	
Fax number / E-Mail address:	



C	INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/ DESTROYED
D	REASONS FOR “CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request)

Signed at ..... this ..... Day of ..... 20.....

.....  
 Signature of data subject / designated person