

# **PRIVACY STATEMENT**

## **1. Introduction**

Tshipi Noto Financial Services (Pty) Ltd (“Tshipi Noto”, “the Company”, “we”, “our”, “us”) subscribe to the provisions of the Protection of Personal Information Act No 5 of 2013 (POPIA) and therefore respects the right to privacy and confidentiality of your personal information and is committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and transparent. Under the provisions of the POPIA, we are required to explain to you why we collect information about you, how we intend to use that information, how we will safeguard it and whether we will share your information with anyone else. Your personal data will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing and in accordance with this Privacy Statement.

This Privacy Statement applies to data provided by you and collected by us through our website. In general, you are able to visit our websites without revealing who you are, or any information about yourself. However, our web servers will collect information (standard information that your browser sends to every website visited) for statistical purposes, which is used by us to improve our websites and services. There may be times when you submit your personal information to us voluntarily through completing a form(s) provided in our website.

Please note that our websites are not intended for children, and we do not knowingly collect any personal information relating to children in connection with them.

## **2. How we collect personal information**

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you when you complete a form, electronically, telephonically or by way of a hard copy;
- Indirectly from you when you interact with us electronically by way of our website, or social media channels, which may include the collection of metadata (data about data); and
- from other authorised sources for the purpose of providing services to you, for examples other insurers, bureau, verification agencies, etc

Additionally, in the course of your visit to our websites, we will collect information (standard information that your browser sends to every website visited) for statistical purposes, such as the number of visits, access time and date of your visit to the website, the address of the pages visited on our website (URL), your IP address, name and version of your web browser, the webpage (URL) you have visited before you accessed this website, certain cookies and the information that you voluntarily provide us when making contact through the form(s) provide in our “Contact Us” or “Enquiries” webpage.

## **3. What personal information we collect**

Your relationship with Tshipi Noto determines the exact nature of the personal information we process, and the purpose for which such personal information is collected and used. As a financial service provider, Tshipi Noto may process the following personal information:

- **Information about you** - for example, your name, identity number, age, gender, date of birth, nationality, occupation, physical address and contact details. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties.
- **Contact information** - for example, we may receive your email address, physical address, phone number, and postal address.
- **Online information** - for example, cookies and IP address (your computer's internet address), if you use our websites and/or social media channels. On our website we also collect your name, email address, phone number, location when you complete the form on "*Contact Us*" or "*Enquiries*"
- **Financial information** - we may process information related to payments you make or receive in the context of an insurance policy or claim, this will include source of funds/wealth and banking details.
- **Contractual information** - for example, details about the policies you hold and with whom you hold them.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data, and any information about criminal convictions and offences.)

Prior to us process your personal information, you will be required to consent to the processing of your personal information. If you give us your consent for a specific purpose, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent for processing your personal information for a specific purpose, we will stop processing your personal information and only retain your personal information as required by the relevant legislation.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

#### **4. How we use your personal information?**

We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner. We are also required by various laws to maintain a record of our dealings with clients.

In order for us to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, we need to collect, use and disclose the personal information of clients.

To the extent permissible under applicable laws, Tshipi Noto may use your information:

- To provide you with our financial products and services, and maintain our relationship with you;
- To provide you with financial advice and intermediary services;
- To conclude and administer your application, which may include underwriting;
- To execute a transaction in accordance with your request;
- Allowing for the collection of payments.
- Fraud prevention and detection and other legal compliance requirements
- To assess, check, and process claims;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- To address your service requests, queries and complaints
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the Financial Sector Conduct Authority and Prudential Authority);
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of our internal policies;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with Tshipi Noto and to help us improve our offerings to you;
- Executing the Tshipi Noto's strategic initiatives.
- To share with other entities in the Tshipi Noto Group, so that we can market our financial products and services which we deem similar, with the aim of offering you the opportunity to take up some of the financial products to fulfil your needs, provided that you have not objected to receiving such marketing;
- Conducting market research from time to time via email, telephone, or other means (for example, inviting me to events).
- To process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- To share your personal information with third parties if there is a legitimate reason to do so include further purposes compatible with the above; and
- For any purpose related to and compatible with the above.

## **5. Sharing of personal information**

Your personal information can be accessed by or may be shared internally on a need-to-know basis within the Company to ensure you receive the best service. Tshipi Noto will only share your personal information with third parties if there is legitimate to do so. We may disclose the personal information you provide to us to the following entities:

- Our underwriters / insurers who are involved in the provision and/or administration of financial advice products and services;
- Other third parties in relation to the purposes set out under the previous section (How we use your information);
- Other insurers, public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention

We have agreements with our service providers that they comply with the required privacy terms.

We may also disclose your information where we have a duty or a right to disclose in terms of the law and industry regulations.

We will not sell, transfer or disclose your personal information to third parties unless we have your express consent or if we need to do so to fulfil your request or for other related purposes and we will never sell, transfer or disclose your personal data to third parties for their marketing use.

Additionally, Tshipi Noto may be obliged to disclose your personal information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Financial Sector Conduct Authority or Prudential Authority).

## **6. Security and retention of personal information**

Tshipi Noto intends to protect the integrity and confidentiality of your personal information. Tshipi Noto has implemented appropriate technical and organisational information security measures (e.g., encryption, firewalls, regular audits and inspections) in order to protect personal information from loss, unauthorised access, misuse, alteration or destruction. Only authorised persons are provided access to personal information; such individuals have agreed to maintain the confidentiality of this information. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices

Tshipi Noto will advise you and the Information Regulator (established in terms of section 39 of the POPIA) when there's been an actual or a threat to access and process the Personal Information that is in its possession by an unauthorised party.

Your personal information will be held and used for as long as we reasonably consider necessary for achieving the purpose set out above and as is permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, your personal data will be stored for 5 years after termination of your policy with us. You may request us to delete your personal information, this will be carried out unless there is a statutory obligation that

requires us to keep your information for a specific period. We will, however, destroy the record of your information beyond reconstruction when that period comes to an end.

#### **7. Transfer of Personal Information Outside the Republic of South Africa (RSA)**

Tshipi Noto will not send your personal information to another country to be processed, however if in future we do, we will ensure to obtain a consent from you before sharing your personal information to any person outside South Africa. We will also ensure that we follow all the provisions of POPIA when we send your personal information to another country.

#### **8. Marketing**

Where you provide your personal information to us in the context of a sale of one of our products or services, you agree to us sending you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from Tshipi Noto at any time by contacting the Tshipi Noto Client Services on 0861 87 4474

#### **9. Your rights as a Data Subject**

With regard to your Personal Information, Section 5 of the POPIA gives you, the Data Subject the right to:

- not have your personal information processed in an unlawful manner,
- be notified that your personal information is being processed,
- not have your personal information processed without your consent,
- object to the processing of your personal information,
- be given the details of the principal party that is in possession of your personal information,
- update your information as when a change occurs,
- have your personal information protected from access by unauthorised parties,
- be notified when unauthorised parties have gained access to your personal information,
- request the deletion, destruction of your personal information,
- be given access to the record that has your personal information,
- be advised of the period for which your personal information will be kept, and
- have your personal information destroyed when the purpose for which it was collected is met.

**Right of access to information:** The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances.

**Correction of your information:** You can exercise your right to correct or update your personal information by following the Tshipi Noto PAIA Manual or contacting us 0861 874474

**Objection to processing of your information:** You may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing

## **10. Changes to this Privacy Statement**

We may update this privacy statement at any time by publishing an updated version here with the date on which the version was published. The new modified or amended privacy statement will apply from that revision date. Therefore, we encourage you to review this privacy statement periodically to be informed about how we are protecting your information.

## **11. Contact Us**

Please contact us on the following contact details when you want to exercise a legal right in relation to your personal information or an inquiry if you have a question or complaint about the handling of your personal information.

You may also contact using the following details:

Tshipi Noto Financial Service

Physical Address: 72 6<sup>th</sup> Street, crn 7<sup>th</sup> Avenue, Springs, 1560

Tel: 0861 87 4474

Email: [Customerservices@tshipinoto.co.za](mailto:Customerservices@tshipinoto.co.za)

## **12. The Information Regulator**

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa)

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

P.O. Box 31533, Braamfontein, Johannesburg, 2017

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

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)