

PROTECTION OF PERSONAL INFORMATION POLICY

FOR

ROBSON SAVAGE (PTY) LTD

(Registration number 2000/010885/07)

July 2017

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PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013

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**PROTECTION OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF
PERSONAL INFORMATION (POPI) ACT 4 OF 2013**

ROBSON SAVAGE POPI POLICY

1. INTRODUCTION

Robson Savage is a company functioning within the retirement fund industry, providing administration, consulting and actuarial services that is obligated to comply with The Protection of Personal Information Act 4 of 2013 (POPI).

POPI requires Robson Savage to inform their clients as to the manner in which their personal information is used, disclosed and destroyed.

Robson Savage guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

This policy sets out the manner in which Robson Savage deals with their client's personal information and stipulates the purpose for which said information is used. The Policy is made available on the Robson Savage company website www.robsav.com and by request from the company's information officer.

This policy is drafted in conjunction with the Financial Intermediary Association's ("FIA") Protection of Personal Information Notice.

2. PERSONAL INFORMATION COLLECTED

Section 9 of POPI states that *“Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.”*

Robson Savage collects and processes client’s personal information pertaining to the client’s financial needs. A client may be a retirement fund, its management and trustee board, an individual, and an employer. For purposes of this Policy, clients include potential and existing clients.

The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, Robson Savage will inform the client as to the information required and the information deemed optional. Examples of personal information we collect include, but is not limited to:

- The Client’s Identity number, name, surname, postal and physical address, postal code, marital status, and number of dependants;
- Description of the client’s, business, assets; financial information, tax number, banking details, etc.-
- Any other information required by Robson Savage, suppliers insurers and assetmanagers in order to provide clients with an accurate analysis and assessment of their financial needs.

Robson Savage does not collect or processes the client’s personal information for marketing purposes.

Robson Savage aims to have agreements in place with all product suppliers, insurers and third party service providers to ensure a mutual understanding with regard to the protection of the client’s personal information. Robson Savage’s suppliers will be subject to the same regulations as applicable to Robson Savage.

3. THE USAGE OF PERSONAL INFORMATION

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed.

This may include:

- Providing products or services to clients and to carry out the transactions requested;
- For underwriting purposes;
- Collating and processing claims;
- Confirming, verifying and updating client details;
- For purposes of claims history;
- For the detection and prevention of fraud, crime, money laundering or other malpractices;
- For audit and record keeping purposes;
- Providing services to clients, to render the services requested and to maintain and constantly improve the relationship;
- Providing communication in respect of Robson Savage, the retirement funds industry and other regulatory matters that may affect clients; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for Robson Savage's processing of Personal Information:

- a. The client's consents to the processing: - consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship;
- b. The necessity of processing: in order to conduct an accurate analysis of the client's needs.
- c. Processing complies with an obligation imposed by law or a contractual obligation on Robson Savage;
- d. The Financial Advisory and Intermediary Services Act ('FAIS') requires Financial Service Provider's ('FSPs') to conduct a needs analysis and obtain information from clients about their needs in order to provide them with applicable and beneficial

products;

- e. Processing protects a legitimate interest of the client — it is in the client's best interest to have full and proper needs analysis performed in order to provide them with an applicable and beneficial product or service.
- f. Processing is necessary for pursuing the legitimate interests of Robson Savage.

4. DISCLOSURE OF PERSONAL INFORMATION

Robson Savage shall not disclose a client's personal information to any product or third party service provider's where no agreements are in place to ensure that compliance with confidentiality and privacy conditions.

Robson Savage may disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect its rights.

5. SAFEGUARDING CLIENT INFORMATION

It is a requirement of POPI to adequately protect personal information. Robson Savage will continuously review its security controls and processes to ensure that personal information is secure.

The following procedures are in place in order to protect personal information:

- a) The Robson Savage Information Officer is Richard Schuilenburg whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPI. He is assisted by Skye Hartog who will function as the Company's Deputy Information Officer;
- b) This policy has been put in place throughout Robson Savage and training on this policy and the POPI Act has already taken place and will be conducted on an ongoing basis by Robson Savage and/or third party service providers and the Company Compliance function;
- c) Each new employee will be required to sign an employment contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;

- d) Every employee currently employed within Robson Savage will be required to sign an addendum to their employment contracts containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- e) Robson Savage's archived client information is stored both on and off site is also governed by POPI. Access is limited to these areas to authorized personal;
- f) Robson Savage product suppliers, insurers and other third party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed;
- g) All electronic files or data are backed up by the Robson Savage Information Technology (IT) and their IT providers who are also responsible for system security to protect against third party access and physical threats;
- h) Consent to process client information is obtained from clients (or a person who has been given authorization from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Clients have the right to access the personal information Robson Savage holds about them. Clients also have the right to ask Robson Savage to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, Robson Savage may no longer process said personal information. Robson Savage will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.

The details of Robson Savage's Information Officer and Compliance Officer are as follows;

INFORMATION OFFICER DETAILS

Name : Richard Schuilenburg
Telephone number: (011) 643 4520
Fax number : (011) 643 4535
E-mail address: richards@robsav.com

DEPUTY INFORMATION OFFICER DETAILS

Name : Skye Hartog
Telephone number: (011) 643 4520
Fax number : (011) 643 4535
E-mail address: skyeh@robsav.com

COMPANY CONTACT DETAILS

Telephone number : (011) 643 4520
Fax number : (011) 643 4535
Postal address : PO Box 3041, Houghton,2041
Physical address : 2 Hermitage Terrace, Richmond, 2092
E-mail address : home@robsav.com
Website : www.robsav.com

7. AMENDMENTS TO THIS POLICY

Amendments to, or a review of this Policy, will take place on an *ad hoc* basis or at least once a year. Clients are advised to access Robson Savage's website periodically to keep abreast of any changes. Where material changes take place, clients will be notified directly or changes will be stipulated on the Robson Savage website.

8. AVAILABILITY OF THE MANUAL

This manual is made available in terms of Regulation Number R. 187 of 15 February 2002. The manual is available at the offices of the South African Human Rights Commission and shall be published in three of the official languages in the Government Gazette.

9. INFORMATION AS MAY BE PRESCRIBED UNDER SECTION 51(1)(F)

The Minister of Justice and Constitutional Development of the Republic of South Africa has not made any regulations in this regard.

10. RECORDS THAT CANNOT BE FOUND

If Robson Savage searches for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken the attempt to locate the record.

11. THE PRESCRIBED FORMS AND FEES

The prescribed forms and fees are prescribed in terms of Part III of Annexure A of Government Gazette Notice number 187, Regulation 11, which is available on the website of the Department of Justice and Constitutional Development at www.doj.gov.za.

12. ACCESS TO DOCUMENTS

- All Company and client information must be dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:
 - where disclosure is under compulsion of law;
 - where there is a duty to the public to disclose;
 - where the interests of the Company require disclosure; and
 - where disclosure is made with the express or implied consent of the client.

- Disclosure to 3rd parties:

All employees have a duty of confidentiality in relation to the Company and clients. In addition to the provisions above, the following are also applicable:

 - Information on clients: Our clients' right to confidentiality is protected in the Constitution and in terms of the Electronic Communications and Transaction Act, 25 of 2002. Information may be given to a 3rd party if the client has consented in writing to that person receiving the information.

- Requests for company information:
 - These are dealt with in terms of the Promotion of Access to Information Act, 2 of 2000 (PAIA), which gives effect to the constitutional right of access to

information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. Private bodies, like the Company, must however refuse access to records if disclosure would constitute an action for breach of the duty of secrecy owed to a third party.

- In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee.
- The Company's manual in terms of PAIA, which contains the prescribed forms and details of prescribed fees, is available on the Robson Savage website <https://www.robsav.com/legal-information>.
- Confidential company and/or business information may not be disclosed to third parties as this could constitute industrial espionage. The affairs of the Company must be kept strictly confidential at all times.
- The Company views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subject to disciplinary procedures, which may lead to the dismissal of any guilty party.