



VESTA BROKERS

LICENSED FINANCIAL SERVICE PROVIDER FSP 50756

PROTECTION OF PERSONAL INFORMATION POLICY

Of

Vesta Brokers

The Responsible Party – Chantel Becker

DEFINITIONS

Data Subject means the person to whom personal information relates and can be a natural or legal person.

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail 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; and



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- 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;

Third Party Operator means a person (natural or legal) who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

INTRODUCTION

The Protection of Personal Information Act 4 of 2013 requires that we keep plans and process in place on how we process, store and share personal information. We respect our clients' right to privacy and endeavour to collect and use information minimally, transparently, and for the purpose for which it was collected. This Policy and supporting documents is written in easily understandable language so that is practical in usable to a wide audience in the business.

The Responsible Party is committed to keeping information safe and secure, to provide persons with reasonable access to their information, and to give effect to the rights in terms of POPI. To this extent, we emphasise that only the necessary information is collected and used accordingly. The collection serves to protect legitimate legal interests and ensures that we are able to offer clients a service or

CONSENT

Any information that we collect from data subjects will be with consent. The rule of thumb is if the business is collecting information from any person whether natural or legal it must obtain a signed Consent Form. Consent may be obtained from data subjects during introductory meetings, application forms, electronic media or ongoing interaction. It might also be via online website cookies or any other form of valid consent.

Where data subjects provide us with information, the need to do so willingly and voluntarily with the understanding that we require the information to pursue both our clients' legitimate interests as well as our own.



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To carry on business and to protect or facilitate data subject interests, we require personal information from time to time and will treat it with utmost confidentiality. should a data subject at any time during the processing of their information object to same, they may withdraw consent by furnishing us with reasonable notice and in the prescribed form attached.

PERSONAL INFORMATION

Personal information is collected only when an individual knowingly and voluntarily submits information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to this service.

It is the FSP's intention that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

The FSP collects, stores and use the personal information provide by an individual, in order to provide an estimated insurance quotation.

USE OF INFORMATION

The FSP needs to collect personal or other information:

- For underwriting purposes
- Assessing and processing claims
- Conducting credit reference searches or verification
- Confirming and verifying an individual's identity
- For credit assessment and credit management
- For purposes of claims history
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- Conducting market or customer satisfaction research
- For audit and record keeping purposes
- In connection with legal proceedings
- Follow an individual's instructions
- Inform an individual of services
- Make sure the FSP's business suits the individual's needs



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Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only.

The FSP will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever.

SECURITY

The FSP strives to ensure the security, integrity and privacy of personal information submitted. The FSP will review and update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, the FSP will endeavor to take all reasonable steps to protect the personal information, which an individual submits to the FSP or to the FSP's online products and services. The FSP will at all times set the highest standards to ensure the integrity of their systems.

The FSP may engage with other organizations to provide support services to the FSP. Third Parties are obliged to respect the confidentiality of any personal information held by the FSP. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

The FSP's employees are obliged to respect the confidentiality of any personal information held by the FSP. All employees are required to sign an employment contract which includes a confidentiality clause.

ACCESS TO AND INTEGRITY OF INFORMATION

The Responsible Party is committed to maintaining the integrity and accuracy of data subject information. To this extent, data subjects are reminded via consent forms that they may request access to their own information at any time and to request that we update or correct any information that may be outdated or incorrect.



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We take reasonable and routine steps to ensure that the information we collect is up to date and accurate. Where information does not need to be updated to fulfil the purpose for which it was collected, such information will not be updated without the client's express request.

The FSP will not reveal any personal information to anyone unless:

- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law
- It is in the public interest
- The FSP needs to do so to protect their rights

The FSP endeavors to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact the FSP to have the information corrected.

The FSP recognizes the importance of protecting the privacy of information collected about individuals, in particular information that is capable of identifying an individual ("personal information").

HOLDING PERIODS

Information we collect on data subjects will not be held for longer than necessary, or if the purpose for which said information was collected has ultimately been fulfilled, or if the collected information has become obsolete.

Where no agreements, other laws or terms in this policy apply, a record of personal information will be kept for one year after the information was finished being processed, including usage for the specific purpose for which the information was collected originally.

We will destroy Records of Personal Information as soon as reasonably practicable, unless further retention is required by the laws mentioned above or agreed to between the parties.

For more information on durations of specific records, please refer to Annexure A to view our Record Retainment Policy.



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INFORMATION ERASURE

The Responsible Party will endeavour that information be destroyed, where reasonable, after its retention period has lapsed as set out in Annexure A.

Data Subjects have the right to obtain the erasure of their personal data without an undue delay if:

- the information is no longer necessary for the specified purpose it was collected for; or
- where the data subject withdraws consent in terms of this policy; or
- the collected personal information is inaccurate, irrelevant, excessive or incomplete.

If data subjects prefer for The Responsible Party to cease processing their information instead of deleting it, reasonable notice may be given to this effect following which we will immediately stop processing your information.

Notice in terms of erasure must be provided in the prescribed format of forms attached to this policy.

DATA BREACH MANAGEMENT

A Data Breach incident is an event that has caused or can potentially cause damage to our organisation's assets, reputation and / or personnel which includes our customers and any other personal information we process, store or share. A Data Breach can occur when there is intrusion, compromise and misuse of information by a party that does not have lawful access rights to the information that was compromised.

An Information Security Incident includes, but is not restricted to, the following.

- The illegitimate use of our systems for the processing, storage or sharing of data by any person.
- The transfer of personal information to persons who are not entitled to receive that information.
- The loss or theft of personal and/or classified data and information via any means, for example hacking or even attempted hacking.
- Unauthorised changes to personal information via our system hardware or software.
- Unauthorised disruption or denial of service to our system.



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Where there are reasonable grounds to suspect that the personal information of a data subject has been breached (accessed, acquired, deleted or damaged by an unauthorised third party), we will:

- notify the data subject of such a breach in detail, as well as
- inform the information regulator as soon as reasonably possible after the breach is discovered.

CONTACT INFORMATION

Any questions relating to the FSP's privacy policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: **Chantel Becker**

Telephone number: **011 9138427**

Fax number: **n/a**

Postal address: **8 Launder Street , Rynfield Benoni**

Physical address: **8 Launder Street , Rynfield Benoni**

Email address: **chantel@vestabrokers.co.za**

Website: **www.vestabrokers.co.za (Currently under construction)**

As an authorized signatory of The Financial Services Provider I , Chantel Becker , hereby confirm official adoption of this policy

Signed & Dated – Director

Chantel Becker- Director



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Signed & Dated – Information Officer
Chantel Becker
Full name and surname – Information Officer

TREATING CUSTOMERS FAIRLY (TCF)

The principals of TCF are well established in our business practice and it is a principal that we embrace. Should you be interested in the details of TCF, please click on the link below or request for a copy of the TCF Policy.

[https://www.fsb.co.za/Departments/fais/Documents/TCF Small FSP Guide.pdf](https://www.fsb.co.za/Departments/fais/Documents/TCF%20Small%20FSP%20Guide.pdf)