

PRIVACY POLICY



HAMTERN FINANCIAL SERVICES (PTY) LTD

2009/022347/07

FSP NUMBER 40931

1. What Personal Information does the Company require?

1.1. Hamtern Financial Services' ("the Company") Personal Information Protection Policy governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting the Information Officer at insurance@hamtern.co.za or on **011 844 3900**.

1.2. "Personal Information" is defined in the Protection of Personal Information Act (Act no. 4 of 2013) ("POPIA") as follows:

"Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal, or the employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) 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;
- (g) the views or opinions of another individual about the person; and

- (h) 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.”

1.3. “**Processing**” is defined in POPIA as follows:

“any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;”

1.4. The Company is a **Responsible Party** in respect of the Personal Information you (**Data Subject**) provide to the Company. Depending on the type of business we conduct with you or the relationship you have with us, we may process the following types of personal information:

1.4.1. Name

1.4.2. Race (for employment purposes or as otherwise required by applicable law)

1.4.3. Gender

1.4.4. Marital Status

1.4.5. Nationality

1.4.6. Age

1.4.7. Language Preference

1.4.8. Date of Birth

1.4.9. Identification document

1.4.10. Proof of residential/business operating address

1.4.11. South African Income Tax registration number

1.4.12. South African VAT registration number (if applicable per individual/legal entity)

1.4.13. Contact numbers

1.4.14. E-mail addresses

1.4.15. Banking details

1.4.16. Information relating to education, financial, criminal or employment history of a person

1.5. We do not process special personal information in the ordinary course of business although special personal information such as alleged criminal history may be processed during enhanced due diligence screening for anti-money-laundering purposes and sanction screening. We will process other special personal information only if we obtain your consent or have another valid justification to do so.

1.6. Processing of the personal information of children will only be done if the law permits this. In the normal course of our business, a competent person such as a parent or guardian will consent to the processing of the personal information of the child.

2. Why does the Company require your Personal Information?

2.1. This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001 and the Company’s Risk Management and Compliance Programme. The Personal Information forms part of the Company’s requirements when obtaining a discretionary mandate from you or opening an account to facilitate the relevant business activities.

2.2. The Company needs your Personal Information to provide you with the following services:

- 2.2.1. To establish a legal relationship with you;
- 2.2.2. To populate the client account information required on the various on-boarding platforms to open your account; and
- 2.2.3. To generate statements and capture contact information related to this discretionary mandate or account;
- 2.2.4. To conclude a contract with clients and to carry out the obligations in terms of that contract (including managing the account and complying with instructions and requests);
- 2.2.5. To report to clients and keep clients informed;
- 2.2.6. To pursue our legitimate interests such as to compile reports, to comply with requests for information from any internal or external auditor, or any regulatory or supervisory body, or to correspond with you;
- 2.2.7. Evaluate your current and future needs and to suggest further products or services to you;
- 2.2.8. Evaluate and improve the effectiveness of our business and products, services and offerings;
- 2.2.9. To provide you with information about our products and services from time to time via email, telephone or other means (for example invite you to events);
- 2.2.10. 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);
- 2.2.11. For operational and further investment purposes;
- 2.2.12. Verify your identity for security purposes;

3. How is your Personal Information Processed?

- 3.1. Your Personal Information is Processed at 1st Floor, Wanderers Building, Oval Office Park, Meadowbrook Lane, Bryanston, 2021.
- 3.2. Storage of your Personal Information takes place on the hosted servers at BCX and Terraco.
- 3.3. No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.
- 3.4. Your Personal Information is shared with the various Insurance Companies (Insurers) for policy management and in order to perform our services to clients.

4. How long does the Company keep your Personal Information?

- 4.1. Under South African law, the Company is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to the Company's Personal Information Retention Policy. After this period, your Personal Information will be irreversibly destroyed. For more information on the Company's Personal Information retention schedule, please refer to our Personal Information Retention Policy which can be accessed by contacting the Information Officer at insurance@hamtern.co.za or on **011 844 3900**

5. What are your rights?

- 5.1. Should you believe that any of your Personal Information held by the Company is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact the Company's Information Officer at insurance@hamtern.co.za or on **011 844 3900** should this be required.
- 5.2. In addition, if you wish to complain about how the Company has handled your Personal Information, please contact the Information Officer at insurance@hamtern.co.za or on **011 844 3900**

- 5.3. . The Company's Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.
- 5.4. If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or infoereg@justice.gov.za to file an official complaint.