

REAL PEOPLE GROUP - PROTECTION OF PERSONAL INFORMATION POLICY.

VERSION	FORUM	DATE APPROVED
1	RPIH Board	12 May 2021
1	POPI Exco	21 April 2021

Ver	Comments	Owner	Approval Date
1	Original	Chief Information Officer	12 May 2021

1 Introduction

- 1.1 The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act 4 of 2013 (“POPIA” or “the Act”).
- 1.2 Through its business activities, the Group is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees and other stakeholders.
- 1.3 A person’s right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions.
- 1.4 Given the importance of privacy, the Group is committed to effectively managing personal information per the provisions of POPIA, other data privacy legislation and international best practice standards.
- 1.5 The Group will conduct periodic assessments in respect of personal information to ensure that we adhere to our obligations

2 Definitions

- 2.1 In this policy, the terms below shall have the meanings as defined in the Act and cognate expressions shall have corresponding meanings;
- 2.2 “**client**” means any person or entity to which the Group provides a product or service including, but not limited to, debtors’, policyholders and third-party credit providers. For purposes of this Policy, clients include potential and existing clients
- 2.3 “**personal information**” means any information or combination of information that belongs to and/or can be used to identify a natural or juristic person.
- 2.4 “**the Group**” means Real People Investment Holdings, its subsidiaries, affiliate and associate companies.

3 Scope

- 3.1 The policy applies to:
 - 3.1.1 All personal information used, transformed or produced by the Group
 - 3.1.2 Any person in the employ of the Group or otherwise tasked by the Group and involved in the processing of personal information.
 - 3.1.3 All departments, Employees, service providers, contractors and other third parties who have access to personal information.
- 3.2 Where required business and service channels must, subject to this policy, develop standard operating procedures to ensure the implementation of and compliance with the principles as set out

in this policy. A register of all standard operating procedures must be kept and all standard operating procedures are subject to approval by the relevant governance forum.

- 3.3 This policy does not apply where the Group acts as an operator and required to adhere to such policies as may be prescribed by the third party unless such requirements conflict with this policy in which case this policy must be complied with.

4 Personal Information Collected

- 4.1 The Act states that “Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.”
- 4.2 The Group collects and processes client personal information about the clients’ financial position and/or needs. The type of information will depend on the type of client, e.g. credit and/or insurance, the need for which it is collected and will be processed for that purpose only unless the client consents otherwise.
- 4.3 Whenever possible, the Group will inform the client as to the information required and the information deemed optional. Examples of personal information we collect and process include, but is not limited to:
- 4.3.1 The Client’s Identity number, name, surname, address, postal code, marital status, and number of dependants;
 - 4.3.2 Description of the client’s residence, business, employment, assets; financial information, banking details, etc;
 - 4.3.3 Any other information required by the Group, suppliers and Insurers to provide clients with the goods and services which forms part of the Group’s business being financial services related to long term insurance, the provision of credit and debt collection.
 - 4.3.4 The Group is further obliged to process certain information as required in terms of Financial Sector laws, including, but not limited to, The Financial Intelligence Centre Act, The National Credit Act, The Financial Advisory and Intermediary Services Act.
- 4.4 The Group also collects and processes the client’s personal information for marketing purposes to ensure that our products and services remain relevant to our clients and potential clients.
- 4.5 The Group will have agreements in place with all product suppliers, insurers and third-party service providers to ensure a mutual understanding concerning the protection of the client’s personal information. Suppliers will be subject to the same regulations as applicable to the Group.
- 4.6 The Group may also supplement the information provided with information the Group receives from other providers to offer a more consistent and personalized experience in the client’s interaction with the Group and to ensure that personal information is kept accurate and up to date.

5 The Use of Personal Information

- 5.1 The Client's Personal Information will be used for the purpose for which it was collected or obtained.
- 5.2 Where appropriate and practicable we will endeavour to obtain consent to process information, where this is not possible we will process information only for the purpose it was obtained, and will cease processing if compelled to do so as per the provisions of the Act.
- 5.3 The purpose for which we use personal information may include the following;
- 5.3.1 Providing products or services to clients and conclude transactions as requested;
 - 5.3.2 Assessing and processing claims and or queries;
 - 5.3.3 Conducting credit reference and affordability assessments;
 - 5.3.4 Confirming, verifying and updating client details;
 - 5.3.5 Enforcing our legal rights;
 - 5.3.6 Debt collection and credit management;
 - 5.3.7 For the detection and prevention of fraud, crime, money laundering or other malpractices;
 - 5.3.8 Conducting market or customer satisfaction research;
 - 5.3.9 For audit and record-keeping purposes;
 - 5.3.10 In connection with legal proceedings;
 - 5.3.11 Providing services to clients, to render the services requested and to maintain and constantly improve the relationship;
 - 5.3.12 Providing communication in respect of The Group and regulatory matters that may affect clients; and
 - 5.3.13 In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law
- 5.4 The Group will only process personal information if one or more of the following conditions are met;
- 5.4.1 Where the client consents to the processing;
 - 5.4.2 Where the processing is necessary to enable us to perform our duties or enforce our legal rights;
 - 5.4.3 Processing complies with an obligation imposed by law on the Group;
 - 5.4.4 Processing protects a legitimate interest of the client, it is in the client's best interest to
 - 5.4.4.1 have a full and proper assessment performed to provide them with an applicable, beneficial and affordable product or service; or
 - 5.4.4.2 assist clients with debt to meet their financial obligations, and support our clients on their journey to become financially independent; or

- 5.4.4.3 assist clients in obtaining appropriate long term insurance products and cover.
- 5.4.5 Processing is necessary for pursuing the legitimate interests of the Group or of a third party to whom information is supplied — in order to provide clients with products and or services both the Group and any of our product suppliers require certain personal information from the clients to make an expert decision on the unique and specific product and or service required.

6 Disclosure of Personal Information

- 6.1 The Group may disclose a client's personal information to any of the Group companies or subsidiaries, joint venture companies and or approved product- or third-party service providers whose services or products clients elect to use, subject to agreements being in place to ensure that compliance with confidentiality and privacy conditions.
- 6.2 The Group may also share client personal information with, and obtain information about clients from third parties for the purposes listed above.
- 6.3 The Group may also 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 our rights.

7 Safeguarding Client Information

- 7.1 The Group undertakes to adequately protect personal information.
- 7.2 The Group will continuously review its security controls and processes to ensure that personal information is secure
- 7.3 The following procedures are in place to protect personal information:
 - 7.3.1 The Group Information Officer is Neil Grobbelaar 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 Deputy Information officers who are all members of the senior management team;
 - 7.3.2 This will be put in place throughout the Group and training on this policy and the POPI Act will be undertaken.
 - 7.3.3 Employees are required to sign an employment contract and/or addendum or the use and storage of employee information
 - 7.3.4 Client information, including archived information, will be dealt with in terms of the relevant Group data security and backup policies
 - 7.3.5 Suppliers and/or service providers to the Group will be required to provide undertakings guaranteeing their commitment to the Protection of Personal Information in accordance with

this policy and the SOP's issued in terms hereof; this is an ongoing process that will be evaluated as needed.

- 7.3.6 The Group will keep a register of all third parties who processes personal information on our behalf

8 Access And Correction Of Personal Information

- 8.1 Clients have the right to access the personal information the Group holds about them.
- 8.2 Clients also have the right to ask the Group to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, the Group may no longer process said personal information.
- 8.3 The Group will take all reasonable steps to confirm the client's identity before providing details of their personal information or making changes to their personal information.
- 8.4 The details of our Information officer is as follows;
- 8.4.1 Name: Neil Grobbelaar
- 8.4.2 Telephone Number: 043 702 4600
- 8.4.3 Email legalquery@dmc.co.za
- 8.4.4 Physical Address: 12 Esplanade Road, Quigney, East London
- 8.4.5 Postal Address: P.O. Box 19610, Tecoma, 5214

9 Governance

- 9.1 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 our website periodically to keep abreast of any changes. Where material changes affecting clients take place, clients will be notified directly or changes will be stipulated on our website