



# Group privacy policy

October 2021





## Introduction

Your privacy is important to PSG Konsult Ltd and its subsidiaries ('PSG' or 'we' or 'us'). We are committed to protecting your privacy and ensuring that your personal information is collected, retained, processed and used properly and lawfully.

## Purpose

This privacy notice aims to explain how we process your personal information under applicable data protection laws that sets out how we manage the privacy of your information in our company. We are constantly updating our system processes and technology to ensure optimal data protection.

## Our data protection values

When collecting, using, storing or sharing your personal information, the following is important to us:

1. Using your personal information in a way that is fair and trustworthy.
2. Transparency about what information we collect, what we do with it and who we share it with.
3. Working with you to promptly resolve any query or concern which you may have on how we use your information.
4. Taking all reasonable steps to protect your information from misuse and keeping it secure.
5. Complying with all applicable data protection laws and regulations and cooperating with data protection authorities and regulators.

## What information we collect

We collect your personal information to provide you with our products and services. To do this, we either enter into an agreement or accept a mandate from you, authorizing us to provide these services to you and on your behalf in relation to third parties.

The type of personal information we collect will depend on the purpose for which it is collected and used. When you contact us, enter into an agreement with us or provide us with a mandate to represent you, we will collect only the personal information that we need to provide you with the products and/or services you have selected.

The type of personal information that we collect includes:

- information relating to your education-, medical-, financial-, and/or employment history;
- your identity number, e-mail and physical address, telephone numbers;
- special personal information, including personal information in respect of your health and personal information in respect of your children.

We also collect information about your experiences over time as you use our website. This information is given to your browser by our web server when you visit our website.



## Cookies

When you use our website, we gather standard internet visitor usage information. This is done using cookies and similar tools. Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a website which help websites remember information about your device and how you use the website.

We use this information to:

- Monitor the areas of the website that are used most frequently for future website enhancements
- Temporarily store input information in our calculators, tools and other website functionality
- Display more focused advertising to a user by way of third party tools

This information is anonymised, pooled information, and individual behaviour or patterns cannot be identified. We do not use cookies to track your internet usage after leaving our sites and we will not sell or distribute cookie information.

If you do not want us to collect this information, your browser will normally allow you to disable cookies. This functionality is usually located within a 'Privacy and Security' option within your web browser's settings menu.

## Use of your personal information

We will collect and process your personal information only for the purposes for which it was collected and as agreed, for example:

- to provide you with our products and/or services
- to execute your transactions in accordance with your request
- to maintain our relationship with you and meet our contractual obligations with you
- to conduct credit reference searches or verification with third parties
- to confirm and verify your identity or to verify that you are an authorized user for security purposes
- for the detection and prevention of fraud, crime, money laundering or other malpractice
- for debt tracing or debt recovery
- to conduct market or customer satisfaction research and for statistical analysis
- for audit and record-keeping purposes
- to liaise with third-parties to offer services to that form part of the products you have with us
- in connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes. If you inform PSG or its subsidiaries that you do not want us to continue using your personal information, we will stop doing so, subject to any legal obligations that may apply.



## Who we share your information with

We occasionally disclose your personal information and share it with third parties who are involved in the delivery of products or services, giving effect to the terms of our agreement. We have agreements in place with the recipients to ensure that they also comply with applicable privacy and confidentiality laws. PSG conducts due diligence investigations into all new and existing financial and related products and services offered by third parties on an ongoing basis.

We may legally disclose your personal information in circumstances where we have a duty or a right to disclose in terms of law or other industry codes, or where we have a legitimate reason to do so.

Some of our products and services are developed, managed, marketed and sold by various companies within the PSG Konsult Group. We treat information about our customers as confidential. Sharing this information within the PSG Konsult Group is necessary to carry out actions for the conclusion or performance of the agreement to which you are a party. Sharing of information further allows us to provide you with consolidated reporting, enhanced efficiencies in our advice process (including the sharing of personal information with product providers in the Group that enables the pre-population of application forms and the like), and allows us to meet your needs with our range of products.

## Information quality and security

We provide adequate protection to prevent unauthorized access and use of the personal information we store. We will continue to review our security controls and related processes and technology to ensure that your personal information is secure and used only in line with what is set out in this notice.

Our security policies and procedures include:

- physical security
- computer and network security
- secure communications
- security when contracting out activities or functions
- retention and disposal of information
- acceptable use of personal information
- governance and regulatory compliance
- monitoring access and usage of private information
- adequate protection of personal and identifiable information
- data portability
- investigating and reacting to security incidents

Where we interact with third parties and share personal information, we take reasonable steps to impose the appropriate security practice obligations on these parties. This is to ensure that personal information that we are responsible for, is kept secure and only processed lawfully.



## Transfer across borders

The disclosure of personal information to third parties may involve the transfer of personal information to other countries. These countries may not have the same data protection laws as those that apply in our country. We have put in place contractual provisions with those recipients. Before we contract with third parties in foreign jurisdictions, we ensure that the recipient is subject to a law or binding agreement with PSG that provides for similar or better protection of your personal information than is provided for in this notice.

## Your rights of access to information

You have the right in certain instances to request a copy of the personal information which we have on record for you. To do so, simply contact our client services department at [clientservice@psg.co.za](mailto:clientservice@psg.co.za) or your financial adviser or consult our PAIA manual on our website. Before we provide you with your personal information, we will take reasonable steps to confirm your identity.

Please note that such an access request may be subject to the payment of a legally allowable fee.

## Correction of your information

In line with POPIA, you have a right to ask us to update or correct any of your personal information held by us. You may do this by contacting your financial adviser or a client services consultant.

We will take reasonable steps to confirm your identity before making changes to the personal information we may hold about you.

Keeping your personal information up-to-date and accurate remains your responsibility. If there are changes to your personal information such as a change in contact details or a residential address, please contact your financial adviser or a client services consultant to update your records.

## Retention of your personal information

You have the right to request that we erase or delete your personal information. However, this right is limited.

We will not retain your personal information for longer than is necessary for the purpose for which it was collected or processed. The period for which we retain your personal information is influenced by:

- your consent
- any compliance requirement in terms of applicable legislation
- the retention of personal information for scientific, historical or statistical purposes
- for the establishment, exercise or defence of legal claims



## Privacy complaints, compliments or comments

Where you have any questions, comments or concerns about how we deal with your personal information, you may request that we:

- do not contact you in future
- provide you with a copy of the personal information which we hold about you
- correct, update, or pseudonymise your personal information in our records
- investigate any alleged misuse of your personal information

## How to contact us and the information regulator

If you have questions about this notice or need further information about our privacy practices or policy, please contact us at [pi@psg.co.za](mailto:pi@psg.co.za) or contact your financial adviser.

### **Information Regulator:**

While you may at any time, first approach us with any complaints, you do also have the right to complain to the Information Regulator, whose contact details are:

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)  
Complaints:  
[POPIAComplaints.IR@justice.gov.za](mailto:POPIAComplaints.IR@justice.gov.za)