



PRIVACY AND DATA PROTECTION POLICY

1. INTRODUCTION

The FAIS Act provides for the protection of personal information of Clients; and the Protection of Personal Information Act, 2013 ("POPIA") provides for 8 Data protection Information principles to apply with to ensure the protection of all data that relates to companies, staff and Clients. The Promotion of Access to Information Act, 2 of 2000 provides for access to such information and in which instances it may be refused.

2. PURPOSE

Data privacy and data protection is important to the FSP, and this Policy sets out the POPIA principles in line with existing FAIS requirements to ensure the safekeeping of all Data by the FSP and its Key Persons/Parties/Employees (as applicable). This Policy applies to all Data obtained via products, services, websites events operated by the FSP or by any other means.

3. DEFINITIONS

Information: means any Data relating to the Data Subject and include reference to personal information.

Data Subject: means the person to whom the personal information relates and can include Clients, staff and / or Company information.

Processing: Any use by any means of Data Subject's Information.

4. The POPIA PRINCIPLES TO PROTECT DATA

Principle 1. Accountability: The FSP must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in the FSP.

Principle 2. Processing Limitation: Only necessary information should be collected, directly from the person to whom the Personal Information relates and with their consent and the processing should be for a lawful purpose.

Principle 3. Purpose specification: Personal Information should be collected for a specific purpose and the Data Subject must be aware of the purpose for which it was collected.

Principle 4. Further processing limitation: Further processing of Personal Information must be compatible with the purpose for which the information was collected (Principle 3)

Principle 5. Information quality: Reasonable steps must be taken to ensure that all information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected. (Principle 3)

REPRESENTATIVES: JURIËN JORDAAN LLB CFP® and JANIEN JORDAAN

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Principle 6. Openness: The Party collecting the information must be transparent and inform the applicable regulator if it is going to process the information and ensure that the Data Subject has been made aware that his/her information is going to be collected.

Principle 7. Security Safeguards: The integrity of the information under the control of a party, must be secure through technical and operational measures.

Principle 8. Data Subject Participation: Data Subjects have the right (free of charge) to request confirmation from the party that holds their information on the details they hold and may request for it to be amended / deleted.

5. PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

Appointment of the Information Officer: Janien Jordaan

The FSP has appointed an Information Office who is a senior person in the FSP, who will be responsible for ensuring that the FSP has been properly informed and trained on ensuring the safekeeping and protection of Information in the FSP and that the required process is implemented to ensure compliance. The Information Officer can be contacted at

Tel: 012-5431113, Cell: 084 565 1018, Email: janien@jordaanadvisors.co.za

Information Purpose:

The type of information the FSP collects will depend on the purpose for which the Data is collected and used. The FSP will collect the necessary Information from Data Subjects for various purposes, including the following:

- Rendering suitable services for e.g. financial services (including the rendering of advice and intermediary services) and administrative services to Data Subjects
- Improving services and product offerings to Data Subjects
- Providing information and resources most relevant and helpful to Data Subjects.
- Appointing suitable individuals / companies to provide financial services/products to Data Subjects.
- Ensuring compliance with legislation that requires specific information to be collected.

Access to Information

- Data Subjects have the right to request a copy of the Information that the FSP hold on them or their business. Should a Data Subject wish to obtain any such information, the Data Subject may request it by contacting the Information office on the details provided above. Any such access requests may be subjected to the payment of an allowable administration fee.
- The FSP will not disclose or share information relating to any Data Subject unless: It is specifically agreed with the Data Subject; it is already publicly available or in the interest of the public; required in terms of Law or if the FSP believes in good faith that the Law requires disclosure thereof.
- The FSP 's PAIA Manual (in terms of the Promotion of Access to Information ACT, 2 of 2000) sets out the process for access by third parties to Data Subjects Information kept by the FSP, and the instances in which it may be refused.

Collection of Information:

General:

- The FSP collects Information in various ways e.g., directly from individuals (for example, when purchasing a financial product, registering an account, using a product or signing up for a newsletter), from employers, publicly available information, through cookies, and/or similar technology.
- Where possible, the FSP must inform Data Subjects which information they are legally required to provide to the FSP and which information is optional.
- With the Data Subjects consent, the FSP may supplement the information with other information received from other companies and/or organizations such as the South African Revenue Services (SARS) in order to enable the FSP to render suitable and proper services to Data Subjects.

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User Supplied Information:

The Data Subject may be required to provide some personal information, for example his/her name, address, phone number, email address, payment card information (if applicable), and/or certain additional categories of information as a result of using/receiving financial services, purchasing financial products, and using websites and related services.

The FSP will keep this information in a contact database for future reference, as needed.

Marketing:

The FSP may use certain information provided by Data Subjects to offer them further services that the FSP believes may be of interest to them or for market research purposes. These services are subject to prior consent being obtained from Data Subjects. If a Data Subject no longer wishes to receive further services or offering from the FSP, it may unsubscribe from the services or contact the Information Officer at the contact details provided above.

Usage and Web server logs:

- The FSP may track information about a Data Subject's usage and visits on the FSP's website. This information may be stored in usage or web server logs, which are records of the activities on the FSP's services, products and/or sites. The FSP's servers automatically capture and save such information electronically. Some examples of the information that may be collected include the Data Subject's:
 - Unique Internet protocol address;
 - Name of the Data Subject's the unique Internet Service Provider
 - The city, state/ region and country from which a Data Subject accesses the FSP's website
 - The kind of browser the computer use;
 - The number of links clicked within the site;
 - The date and time of visits to the site;
 - The web page from which the Data Subject arrived on the FSP's site;
 - The pages viewed on the site;
 - Certain searches/queries conducted on the site via the FSP's services, products and/or websites.
- The Information collected in usage or web server logs help the FSP to administer the services, products and sites, analyse its usage, protect the product and/or website and content from inappropriate use and improve the user's experience.

Cookies:

- In order to offer and provide a customized personal service through the FSP's products and websites, the FSP may use cookies to store and help track information about the Data Subject. A cookie is a small text file sent to the Data Subject's device that the FSP uses to store limited information about the Data Subject's use of the services, products or website.
- The FSP uses cookies to provide the Data Subject with certain functionality (such as to enable access to sever log-in areas and to save the Data Subject having to re-enter information into product, services or website forms) and to personalize the FSP's services, products or website content. Without cookies, this functionality would be unavailable.

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Retaining of Information

- The FSP may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects.
- Information may be retained only to serve the purpose of collecting the information and be deleted /destroyed once the purposes have been fulfilled, subject to other regulatory requirements where information is to be kept for a specific prescribed period.
- Information and records of a personal nature of Clients and/or Employees will be stored for a period of 5 years before being destroyed.

Correcting / Amending / Updating / Deletion of Information

- Data Subjects are required to inform the FSP should there be any changes to the information kept by the FSP.
- A Data Subject may request the FSP to correct, amend, update or delete its Information at any time when applying or making use of any financial products or services of the FSP, by contacting the Information Officer at the contact details provided above.
- The FSP will take all reasonable steps to confirm the Data Subjects identity before making changes to Information.

Information Security:

- The FSP will take all reasonable precautions to protect information from loss, misuse, unauthorized access, disclosure alteration and destruction.
- The FSP will not sell, rent or lease mailing lists with information to third parties and will not make a data subject information available to any unaffiliated parties, except for approved agents, suppliers and contractors, or as otherwise specifically provided for, as agreed with the Data Subject in writing or as required; in terms of any Law.
- The FSP may disclose information of a data subject or information about a Data Subject's usage of the FSP's Financial services, financial products, websites or mobile applications to unaffiliated third parties as necessary to enhance services, financial product experience to meet the FSP's obligations to content and technology providers or as required by law, subject to agreements in place that provides for the protection of information of Data Subjects.
- The FSP has implemented appropriate security measures to help protect information against accidental loss and from unauthorized access, use or disclosure. The FSP may also store and process information in systems located outside the FSP'S premises or the Data Subjects home country. However regardless of where storage and processing may occur, the FSP takes appropriate steps to ensure that information is protected as required under relevant Data Protection/Privacy laws.
- The Data Subject's access to some of the FSP's services and content may be password protected and non-disclosure of such usernames and passwords are required to ensure the safekeeping of the Data Subjects information. It is recommended that the Data Subject sign out and close the browser of the account or service at the end of each session.
- The FSP is legally obliged to provide adequate protection of Information of the Data Subject (FSP, Clients and/or Employees) will be kept safe and secure and not be disclosed to any unauthorized third parties, without the consent of the relevant Data Subject.
- The FSP may from time-to-time transfer information within and between various worldwide locations in compliance with the country of origin's regulations and this Policy.
- Key Persons/Parties/Employees are not allowed to disclose any information to any unauthorized third party as it may lead to a breach, disciplinary action and possible dismissal.
- The FSP takes reasonable steps to protect the personal information, which is held in a firewalled server. The FSP can however not guarantee the security of information transmitted to it electronically from Data Subjects and they do so at their own risk. The FSP maintain administrative, technical and physical safeguards to ensure protection of information against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information provided to

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the FSP by the Data Subject. The FSP seeks to ensure compliance with Data Protection / Privacy regulations, laws and industry best practices in respect of the security of a Data Subjects Personal information, and despite the FSP's best endeavours to ensure protection of information. Where the Data Subject is located in another country with other data protection /privacy laws, the FSP may transfer Personal Information to such other countries, but they may not always guarantee the same level of protection for Personal Information as the one in which the Data Subject resides (despite the FSP's best endeavour's to ensure protection of Information. By providing information to the FSP, the Data Subject consents to these transfers.

Adopted by the Key Individual, Member and Representatives on 01 November 2023.

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ASTUTE CONSENT AND INDEMNITY FORM

OWNER OF INSURANCE POLICY CONSENT TO INFORMATION – LETTER OF AUTHORITY

Popi: Section 11(1) and 13(1) in terms of Act 4 of 2013 – The Protection of Personal Information Act

FULL NAME OF CLIENT: _____ **IDENTITY NUMBER:** _____

I acknowledge and understand the following which include the Purpose of Collecting and Processing Information:

1. That sound and proper financial advice can only be provided with full disclosure of relevant information relating to appropriate personal and private information about the client;
2. Such information is furthermore required to _
 - a) determine my financial situation, financial product experience and financial needs and objectives;
 - b) acquire, maintain and service any financial product or to render related intermediary services.
3. Such information may include any information relating to, or interest in -
 - a) long-term insurance;
 - b) collective investment schemes;
 - c) pension funds;
 - d) any other financial product or service.
4. My interest will be best served for stated purpose if any and all such information is provided by -
 - a) The financial Service Exchange (Pty) Ltd, trading as Astute, or any other institution providing a mechanism for the transmission of such information, or;
 - b) any other authorized financial provider;
 - c) Credit score companies such as ITC.
5. Information provided will be for the sole purpose of providing advice, products and services that suit my needs, to verify my identity and conduct credit reference searches, to issue and administer insurance policies, to process insurance claims and take recovery action, to notify me of new products or developments, to confirm, verify and update my personal information and to comply with legal & regulatory requirements
6. Information that may be hold include but is not limited to first names, surname, maiden surname, email address, home, postal and work address, contact information, title, gender, occupation, qualifications, employment details, residency status, investment information, assets, liabilities, insurance, income, expenditure, family history, medical information, tax details, bank details and any other related information.
7. I confirm that information may be shared with third party companies for the provision of quotations and financial products as per my needs. Some of these information may be provided to companies outside of South Africa.

I, the undersigned client / data subject hereby confirm and consent to the following:

- a) I have given the information personally.
- b) I am authorised to provide such information as required.
- c) My consent is voluntarily.
- d) I consent that JORDAAN ADVISORS CC (2010/150005/23), FSP42811 may retain my personal information and all accompanying documents for purposes of obtaining quotations, issuing of policies, providing information to relevant companies for insurance purposes, financial advice, record keeping, audit trail and reporting.
- e) My consent is valid until I withdraw the consent in writing.
- f) My information and documentation may be held on paper-based filing system, offsite storage, cloud bases programs and with applicable Insurance companies.
- g) If any of my information should change, I will be responsible to inform Jordaan Advisors CC and/or Juriën Jordaan and/or Janien Jordaan and/or employees of Jordaan Advisors CC with the new information. I indemnify any of the aforementioned should I not provide them with updated information and my information is forwarded to my previous addresses. I also need to inform Jordaan Advisors CC in writing if any of my information should not be shares with friends, family, children or any specific Third party.
- h) I indemnify JORDAAN ADVISORS CC (Reg 2010/150005/23), FSP 42811 or any of its employees, Key Individuals and Representatives should any of my information becomes public knowledge due to but not limited to theft of files, hacking of online systems, etc.
- i) I understand that JORDAAN ADVISORS CC may need to share my information to provide advice, reports, analyses, products or services that you have requested.

I acknowledge that Jordaan Advisors CC (Reg 2010/150005/23), FSP42811 do have Privacy Policy available on my request and that Janien Jordaan (Identity number 781013 0076 08 1) is the registered Information Officer of Jordaan Advisors CC (Reg 2010/150005/23), FSP 42811.

I confirm that my information or any documentation, statements, tax certificates, etc, may be given via email or by hand to the following person/s:

I confirm for the purposes of providing the said sound and proper financial advice to me that full permission and authority is granted to Juriën Jordaan LLB CFP® and Janien Jordaan of Jordaan Advisors CC (FSP42811) (User name: 900717) to obtain any and all such information via The Financial Services Exchange (Pty) Ltd, trading as Astute, or any other institution providing a mechanism for the transmission of such information. I also give full permission to any insurance company to provide information directly to the financial advisor Juriën Jordaan LLB CFP® and Janien Jordaan of Financial Services Provider Jordaan Advisors CC.

I herewith give consent for the long-term insurer, unit trust manager or other financial institution possessing such information to release such information to the said Authorised User via Astute or direct Email, and I confirm that Juriën Jordaan LLB CFP® and Janien Jordaan of Jordaan Advisors CC shall be acting on my behalf or in my interest and I wave any right to privacy only for the purposes as stated above. I further acknowledge that this consent obtain information on my behalf will remain effective until cancelled by me in writing.

CLIENT SIGNATURE: _____ **DATE** _____ / _____ /2023.

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