

# Privacy Policy 2022

## 1. INTRODUCTION

SAFCOL respects your privacy and your personal information. This Privacy Policy together with the SAFCOL PAIA Manual aim to inform you about how SAFCOL will treat any personal information that it may have about you and how you can access such personal information held. SAFCOL will take all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential.

Please take note of the following information pertaining to the collection and processing of your personal information based on your interactions with us, doing business with us, our products and services, or whilst contacting us via various channels, including making use of our online platforms.

SAFCOL collects, uses and allows access to your personal information in accordance with the laws pertaining to data privacy.

## 2. DEFINITION OF PERSONAL INFORMATION

Personal information is “personal information” as defined in terms of section 1 of the Protection of Personal Information Act 4 of 2013 (“POPIA”). This information relates to an identifiable, living natural person or existing juristic person. Please refer to POPIA for a detailed definition and various types or categories of personal information.

## 3. COLLECTION OF PERSONAL INFORMATION

Your personal information is obtained directly from you either via online forms on our website, email communications, hard copy forms, and on occasion telephonically (only under specific circumstances and with your consent). When you browse the SAFCOL website it is generally done anonymously, SAFCOL does not automatically collect personal information unless such information is provided, or login credentials are used.

## 4. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Generally, SAFCOL collects personal information for the following purposes:

- 4.1 to manage the administrative and business operations of SAFCOL and comply with internal policies and procedures;

- 4.2 to provide you with services offered and requested
- 4.3 to conduct market research and surveys to enable SAFCOL to understand and determine customer location or preferences in order to develop special offers and marketing programmes in relation to SAFCOL products and services and to improve our service delivery and customer experience.
- 4.4 operational reasons which may include access control, investigations or compliance with a legal obligation on SAFCOL
- 4.5 SAFCOL may use your personal information in situations where there is a need to protect you (or someone else's) interests, or where it is necessary in the public interest or for official purposes

At SAFCOL we respect your privacy and value the trust which you place in the company. As a result, we will only process your data when there is a valid reason to do so.

#### **4.5 PROCESSING OF PERSONAL INFORMATION**

By providing personal information to SAFCOL you acknowledge that the information has been collected directly from you and there is consent for SAFCOL to process such information. SAFCOL will only process personal information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.

If you wish to object to SAFCOL processing your personal information, kindly complete Form 1 (Annexure A) in terms of POPIA and send it to [popia@safcol.co.za](mailto:popia@safcol.co.za).

#### **4.6 PROTECTION OF PERSONAL INFORMATION**

SAFCOL strives to secure the confidentiality, integrity and availability of your personal data by taking appropriate and reasonable, technical and organisational measures to prevent loss of, damage to, unauthorised use or destruction; and unlawful access to, or processing of your personal information. To this extent, the company has due regard to generally accepted information security practices and procedures, and constantly reviews and improves security measures.

#### **4.7 STORAGE AND RETENTION OF PERSONAL INFORMATION**

Personal information will only be retained for so long as necessary to carry out the function, Services required and/or for historical and statistical use by SAFCOL, in accordance with the company's records management policy.

#### **4.8 CORRECTION OF PERSONAL INFORMATION**

It is your responsibility to ensure that the personal information provided to SAFCOL is true, correct and accurate at all times. You may update and correct your personal information at any time either via email communication to your SAFCOL representative in relation to the services being used or rendered to you or by completing and sending Form 2 (Annexure B) in terms of POPIA to the Information Officer at [popia@safcol.co.za](mailto:popia@safcol.co.za). SAFCOL does not vet or check the information provided to it, and thus will not be held responsible for any incorrect or outdated information which may be used to provide you with relevant and important communications.

If you would like your Personal Information deleted by SASFCOL, use Form 2 (Annexure B) and send to the Information Officer at [popia@safcol.co.za](mailto:popia@safcol.co.za). Kindly note that deleting your personal information may impact the services being used, offered or access there to.

#### **4.9 ACCESS TO PERSONAL INFORMATION HELD BY SAFCOL**

At SAFCOL we respect your fundamental right to privacy. You have the right to withdraw your consent, right to object, right to access and right to deletion of your personal information, which may be exercised under certain circumstances. In turn you have the duty to safeguard your personal information, inform SAFCOL when there are changes to your personal information, and confirm your identity to action your rights.

See the SAFCOL PAIA Manual for detailed information around your rights to access information held by SAFCOL and applicable steps to follow.

#### **4.10 SHARING DATA WITH THIRD PARTIES**

All SAFCOL third parties are required to take appropriate security measures to protect your personal information in line with our policies and process it for specified purposes in accordance with our instructions and applicable legal requirements.

SAFCOL will also release your personal information to a third party if it believes that it is required by law or by a court or statutory body to do so.

#### **4.11 USE OF COOKIES**

SAFCOL may use cookies (a small piece of information that is placed on a user's computer when visiting certain websites) for the purposes of improving the efficiency of the website, administering services to users or establishing usage statistics. SAFCOL is not responsible for the content or the

privacy policies of websites of other institutions to which it may link you to – mainly for information purposes and access to documents provided by such institutions.

#### 4.12 APPLICABLE LAWS

This Policy will be governed by the laws of the Republic of South Africa. Specifically, SAFCOL undertakes to comply with the provisions of POPIA and the Promotion of Access to Information Act No.2 of 2000 (“PAIA”).

**Annexure A**



**FORM 1**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018  
[Regulation 2]**

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject	
Unique Identifier / Identity Number	
Residential, postal or business address	
	Code:
Contact Number(s)	
Fax Number / Email Address	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party	
Unique Identifier / Identity Number	
Residential, postal or business address:	
	Code:
Contact Number (s)	
Fax Number / Email Address	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of data subject/designated person**

Annexure B



**FORM 2**  
**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR**  
**DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS**  
**OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013**  
**(ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION,**  
**2018**  
**[Regulation 3]**

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

**Request for:**

<input type="checkbox"/>	Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
<input type="checkbox"/>	Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique identifier/ identity number:	
Residential, postal, or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name:	
Residential, postal or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	

C	INFORMATION TO BE CORRECTED/DELETED/DESTROYED
D	<p>REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or</p> <p>REASONS FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at ..... this ..... day of ..... 20 .....

.....  
Signature of data subject/designated person