

THE PROTECTION OF PERSONAL INFORMATION ACT CUSTOMER PRIVACY NOTICE

Privacy Policy

July 2021

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information and tells you about your privacy rights and how the law protects you. We use your personal data to provide and improve the services that we provide to you. By using our service, you agree to the collection and use of information in accordance with this Privacy Policy.

1. DEFINITIONS

Definitions

For the purposes of this Privacy Policy:

Client means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Company (either "the Company", "FSP" in this Policy) refers to EB Solutions (Pty) Ltd

Cookies are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

Country refers to South Africa

Device means any device that can access the service such as a computer, a cell phone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Service refers to the list of services listed in Principle 3 of the Policy.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to

facilitate the service, to provide the service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to www.ebsolutions.za.com

2. TYPES OF PERSONAL DATA COLLECTED

In order to make use of the service and in order for the Company and its Representatives and employees to render advice or intermediary services, the client may have to provide certain personal identifiable information that can be used to contact or identify that person. Personal identifiable information may include, but is not limited to:

- First name and last name
- Email address
- Address, Postal code, City, Province
- Demographic info such as marital status and gender
- Personal health information
- ID / passport number
- Phone number
- Job title
- Sensitive information such as bank account details and salary details

3. COLLECTING AND USING PERSONAL DATA

3.1. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

a) For the performance of a contract

The development, compliance and undertaking of the contract for the products, items or services purchased by the client or of any other contract with the FSP through the Service.

b) To contact

To contact the Client by email, telephone calls, SMS, or other equivalent forms of electronic communication, regarding updates or informative communications related to the products, services and the client portfolio, contracted services, when necessary or reasonable for their implementation.

c) **To provide the client with information**

To provide clients with news, special offers and general information about other goods, services and events which offered by the Company which are similar to those that have already purchased or enquired about unless the client has opted not to receive such information.

d) **To manage clients' request**

To attend and manage the clients' requests and instructions.

e) **For other purposes**

The FSP may, for its own purposes, use client information to conduct data analysis, identifying trends, determining the effectiveness of promotional campaigns and to evaluate and improve the Service, products, services, marketing and client experience.

3.2 Transfer of Personal Data

Client information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of South Africa or other governmental jurisdiction where the data protection laws may differ than those from South Africa.

The clients consent to this Privacy Policy followed by submission of such information represents agreement to that transfer.

EB Solutions (Pty) Ltd will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of such data and other personal information.

4. DISCLOSURE OF PERSONAL DATA

4.1 Legal requirements

EB Solutions (Pty) Ltd may disclose Personal Data in good faith and in the belief that such action is necessary :

- to comply with any legal obligation, including but not limited to the prescripts of the Financial Intelligence Centre and the Financial Services Conduct Authority, or as required by the South African Reserve Bank or the South African Revenue Services, or as required by a Court of Law,
- to protect and defend the rights or property of the Company,
- to prevent or investigate possible wrongdoing in connection with the service,
- to protect the personal safety of users of the Service or the public.

4.2 Security of Your Personal Data

EB Solutions (Pty) Ltd will take every reasonable measure to keep data protected. That said, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

5. POLICY PRINCIPLES

This policy relies on eight core principles to validate EB Solutions' commitment to protect the personal data of its clients.

Principle 1 : Accountability

EB Solutions (Pty) Ltd will take reasonable steps to ensure that personal information obtained from clients is stored safely and securely.

Principle 2 : Processing limitation

EB Solutions (Pty) Ltd will collect personal information directly from clients and will only process or release client information with their consent and for the purpose of providing Services - except where it is required to do so by law.

Principle 3 : Specific purpose

EB Solutions (Pty) Ltd collects clients' personal information to enable it to render its services as and when requested. These services include, but are not limited to :-

- to analyse clients' risk portfolio to enable us to provide you with a more efficient service experience,

- to provide you with quotations on appropriate financial products and services,
- to verify your identity,
- to manage your life insurance, risk insurance, medical aid, investment products, value-add products portfolio,
- to communicate with you about matters pertaining to the financial services products managed by us.

Principle 4 : Limitation on further processing

Personal information will not be processed in a way that is incompatible with the purpose for which the information was collected initially. The FSP collects personal information for the purpose of rendering financial services and it will only be used for that purpose.

Principle 5 : Information quality

- Whilst it is the client's responsibility to ensure their information is complete, up to date and accurate, from time to time it may be necessary for EB Solutions (Pty) Ltd to request that clients update their information and confirm that it is still relevant and accurate. If EB Solutions (Pty) Ltd is unable to reach a client for this purpose, their information will be deleted from records five years after the termination of the business relationship as per the requirements of the FAIS Act.

Principle 6 : Transparency / openness

- In the instance that personal information is collected from a source other than directly from a client, (for example, from credit checks, Astute checks or from other portals), the client will be made aware:
 - that their information is being collected
 - who is collecting their information by giving them our details;
 - of the specific reason that you are collecting their information.

Principle 7 : Security safeguards

- EB Solutions (Pty) Ltd will ensure that it has implemented technical and organisational measures to secure the integrity of personal information and to guard against the risk of loss, damage or destruction thereof. Personal information must also be protected against any unauthorised or unlawful access or processing. EB Solutions (Pty) Ltd is committed to ensuring that information is only used for legitimate purposes with

client consent and only by authorised employees and third parties which have been disclosed.

Principle 8 : Participation of individuals

- Clients are entitled to know particulars of their personal information held by the FSP as well as the identity of any authorised employees that had access thereto. They are also entitled to correct any information held by the FSP.

6. CHANGES TO THIS PRIVACY POLICY

EB Solutions (Pty) Ltd may update its Privacy Policy from time to time. Clients are advised to review this Privacy Policy periodically for any changes.

7. INFORMATION OFFICER

Pursuant to the requirements of the Protection of Personal Information Act, Act 4 of 2013, (POPIA) please find the details of the appointed Information Officer

<u>Name</u>	John Eagles
<u>Job title</u>	Managing Director
<u>Email address</u>	john@ebsolutions.za.com
<u>Telephone</u>	021 465 0071

8. CONTACT US

If you have any questions about this Privacy Policy, please reach out to us :



john@ebsolutions.za.com



021 465 0071



www.ebsolutions.za.com