

POPI ACT *PRIVACY POLICY*

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1. INTRODUCTION

- 1.1. Black Cygnet Life is committed to safeguarding the privacy of visitors to our website and all information which we are entrusted to process for the purpose intended.
- 1.2. We recognize the importance of protecting your privacy and to process your information lawfully in accordance with the rules prescribed in terms of the Protection of Personal Information Act 4 of 2013, as amended [POPI].
- 1.3. You are not required to provide any personal information on the public areas of this website. However, you may choose to do so by completing the application forms on various sections of our website, including:
 - 1.3.1. making an enquiry regarding our services.
 - 1.3.2. legal updates/Newsletters.
 - 1.3.3. careers.
- 1.4. By adopting this privacy policy, we seek to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organizational steps to prevent unauthorized access to, or disclosure of your personal information.
- 1.5. By continuing to use this website:

You agree that we may collect, collate, process and/or store your personal information for the purpose of:

 - 1.5.1. providing you with access to the website and its contents.
 - 1.5.2. responding to enquiries about our services.
 - 1.5.3. emailing you our legal update newsletters.
 - 1.5.4. inviting you to events / seminars.
 - 1.5.5. contacting you about possible employment.
- 1.6. By continuing to use this website and supplying your personal information you:
 - 1.6.1. do so voluntarily acknowledging that you know and understand the contents and terms and conditions of this policy.
 - 1.6.2. give Black Cygnet Life your informed expression of will, consenting to the processing of your personal information.

2. WHAT TYPES OF PERSONAL INFORMATION DO WE PROCESS?

In the course of our business we process personal information in relation to our clients in terms of financial services provided to them, this includes personal identification particulars, financial advice and intermediary services, product information, your product selections, records such as quotations/ home loan grants, annual renewal letters, Deeds offices searches, tracing and tracking you in the event we cannot contact you on the information provided, underwriting, assessment and processing of claims, credit searches and/or verification of personal information, claims checks, tracing beneficiaries, fraud prevention and detection, market research and statistical analysis, audit & record keeping purposes, compliance with legal & regulatory requirements, verifying your identity.

3. WHEN WILL WE PROCESS YOUR PERSONAL INFORMATION?

Personal information may be processed when you make an enquiry or complete the relevant application form to receive further communications.

4. HOW DO WE USE YOUR PERSONAL INFORMATION?

4.1. We may use your personal information for any legitimate business purposes relating to our services and/or business activities. Some of the purposes for which we use your personal information include:

- 4.1.1. responding to your queries posted on our website or emailed to us.
- 4.1.2. providing you with our financial services, insurance and wills.
- 4.1.3. referring you to other service providers with your consent.
- 4.1.4. improving our website and services by analysing certain information collected, including cookies and other related information.
- 4.1.5. sending you information (in the form of our newsletter) and inviting you to events.
- 4.1.6. complying with our regulatory or other obligations.

5. SHARING OF YOUR PERSONAL INFORMATION

5.1. We may disclose your personal information to third party providers, where necessary, to fulfil the purpose for which your information was provided to us. We may thus share your personal information with:

- 5.1.1. Any service providers who we engage with to process such information on our behalf and/or who render services to us,
- 5.1.2. With other Black Cygnet Life affiliated companies for marketing of similar or related products including financial services, insurance and wills
- 5.1.3. any payment system that Black Cygnet Life uses.

- 5.1.4. regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where Black Cygnet Life has a duty to share information.
 - 5.1.5. third parties to whom payments are made on behalf of employees.
 - 5.1.6. employees, contractors, and temporary staff.
 - 5.1.7. our duly appointed Agents.
- 5.2. We will only share your personal information for purposes of providing services to you or any other legitimate business purpose relating to our business activities, including but not limited to, the protection of our or your rights, complaints, marketing, or carrying out or enforcing any agreement between us.
- 5.3. Where required for our business operations, we may share your personal information with our service providers. We only share information with service providers after obtaining an undertaking that your information will be processed lawfully.
- 5.4. Where the law requires us to do so, we may also share your personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates. We will only share your personal information in these instances where it is necessary for us to do so and only to the extent that your personal information is needed for such third parties to perform their services or obligations.

6. YOUR RIGHTS

You have the right to:

- 6.1. know who is collecting and processing your personal information.
- 6.2. be notified if your personal information has been accessed or acquired by an unauthorised person;
- 6.3. request, where necessary, the correction, destruction, or deletion of your personal information (subject to legislative limitations)
- 6.4. object, on reasonable grounds, to the processing of your personal information.
- 6.5. object to the processing of your personal information at any time for purposes of direct marketing.
- 6.6. not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to create a profile.

7. YOUR OBJECTION TO THE USE OF YOUR PERSONAL INFORMATION

POPI provides that you may object, at any time, to the processing of personal information by Black Cygnet Life, on reasonable grounds. Should you elect to object to the processing of your personal information, please complete the prescribed objection form which may be obtained from the website of the Information Regulator.

8. CORRECTION OF YOUR PERSONAL INFORMATION

- 8.1. You may request us to correct or delete your personal information on grounds that it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or destroy or delete a record of personal information that we no longer are authorised to retain in terms of POPI alternatively any other relevant legislation.
- 8.2. If you wish to request a correction or deletion of personal information or the destruction or deletion of a record of personal information you must submit the prescribed request for correct or deletion form which may be obtained from the website of the Information Regulator.

9. USE OF COOKIES

- 9.1. Cookies are pieces of information a website transfers to a user's hard drive for record-keeping purposes. Information from cookies and similar technologies may be used to collect information about your activities, which allows us to collect standard internet visitor usage information. The use of cookies and similar technologies are an industry standard.
- 9.2. We will only use your personal information for the purposes for which it was collected. In addition, where necessary your information may be retained for legal or research purposes.

10. LINKS TO OTHER SITES

When you are using the website, you could be directed to other sites that are beyond our control. These other web sites may send their own cookies to you collect data or solicit personal information. We do not control the privacy policies of those third-party websites.

11. AMENDING THIS POLICY

11.1. We may update this policy from time to time by publishing a new version on our website.

11.2. You can also obtain the current version of this policy at any time by emailing a request to our Information Officer whose contact details are set out below.

12. CONTACT INFORMATION OF OUR INFORMATION OFFICER

For any queries or requests regarding this Manual or our Privacy Policy, please contact our Information Officer whose contact details are as follows:

Information Officer:	Gareth Kitto
Telephone No:	0872327011
Email:	gkitto@blackcygnet.co.za
Postal address:	Po Box 2507, Mount Edgecombe, 4301
Web address:	www.blackcygnet.co.za
Head Office:	Office 103, 01st Floor The Boulevard, 19 Park Lane, Parkside, Umhlanga 4319