

EVOLUTION CORPORATE BENEFITS (PTY) LTD

PRIVACY NOTICE

PURPOSE OF THIS NOTICE

Ensuring the Privacy and the integrity of personal information is central to the success of any business relationship. As part of our normal business processes when dealing with clients, and to be able to provide the various services that we offer, Evolution will need to collect, process and store information about clients.

This Notice explains how we obtain, use and disclose your personal information, as required by the Protection of Personal Information Act ("POPIA").

Evolution Corporate Benefits (Pty) Ltd is committed to protecting your privacy and ensuring that where it is necessary for us to collect, store and process personal information, that it is done properly, lawfully and in a transparent manner.

PERSONAL INFORMATION INCLUDES

Any information that can be used to reveal a person's identity and relates to an identifiable, living, natural person and where applicable, to an identifiable, existing juristic person (such as a company).

THIS NOTICE SETS OUT THE FOLLOWING

- Who is Evolution Corporate Benefits (Pty) Ltd.
- What personal information do we collect and where do we collect it from.
- The purposes for which we use your information.
- To whom we disclose your information.
- How we safeguard your information.
- Your rights to access and to correct the information we hold about you.
- How to contact us.
- The information Regulators Contact Details.

WHO WE ARE:

Evolution Corporate Benefits (Pty) Ltd is a Section 13b Approved Retirement Fund Administrator and Authorised Financial Services Provider (FSP 5507). We provide administration, advice and intermediary services in respect of a range of financial products including: group retirement funds, group risk insurance arrangements, group medical aid and healthcare funding, plus a range of individual insurance and retail investment products.

WHAT INFORMATION WE COLLECT AND WHERE WE COLLECT IT FROM

We collect and process your personal information mainly to provide you with access to our range of services as well as to administer contributions and benefits where you are a member of a Group Retirement or Group Risk arrangement that we service. In addition, we collect and process your information to help us improve our offerings to you and for certain other purposes explained below.

When you provide us with information about third parties (for example your spouse, beneficiaries and/or dependents), we will process their personal information as part of recording their details and where applicable, for purposes of the administration and/or payment of benefit that are due to them, and to pursue their legitimate interests. We will furthermore process their information for the purpose set out in this Privacy Policy. By giving us information about third parties, you warrant that you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, and from your employer in certain instances, where you are a member of an employer group scheme arrangement (for example where you become a member of an employer retirement fund that we provide services to). In addition, we collect information from you when you appoint us to provide advice and intermediary services in your personal capacity. Where possible, we will inform you what information you are required to provide us with as well as which information is optional.

HOW WE USE YOUR INFORMATION

We will use your information only for the following purposes:

- To administer your contributions as well as any benefits that you or your beneficiaries/dependents become entitled, arising from your membership of that fund and/or any group risk policy.
- To conduct market pricing and benefit surveys amongst insurers and administrators.
- To provide advice and intermediary services in respect of your benefits and/or contract and to carry out transactions requested by you.
- To maintain and service the business relationship that you have with Evolution.
- To assist with and facilitate the assessment and processing of claims.
- To assist with the assessment of medical information for insurance underwriting purposes.
- To confirm and verify your identity in terms of FICA legislation.
- For maintaining accuracy of your personal information.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- For audit and record keeping purposes as required by various laws
- In connection with any legal proceedings that may arise

DISCLOSURE AND COLLECTION OF INFORMATION

We may disclose your personal information to our 3rd party service providers who are involved in the delivery of products and/or services to you. We may also share your personal information with, and obtain information about you from:

- Third parties for purposes listed above as well as for example; fraud prevention agencies, law enforcement agencies and tracing agencies.
- Your personal broker, however only with specific separate authorization from you.

We have a duty to take all reasonable steps to ensure that your personal information is complete and accurate and updated on a regular basis. To enable this, we will in the first instance, always try to obtain the information from you directly.

WE MAY ALSO DISCLOSE YOUR INFORMATION

Where we have a duty or right to disclose in term of law or specific industry codes

Where we believe it is necessary, to protect you or your beneficiaries and/or dependents rights.

INFORMATION SECURITY

We are legally obliged to provide protection of personal information that we hold and to stop any unauthorized access or use of your personal information. We maintain various security controls and related processes in order to ensure that your personal information remains secure.

SECURITY CONSIDERATIONS INCLUDE

- Physical security
- Computer and network security
- Control of access to information
- Communication security
- Security in contracting out activities.
- Security in respect of disposal of any information

We also maintain detailed policies and procedures with respect to responding to and investigating potential data security incidents.

Where we are required to transmit your personal information to 3rd, we will impose appropriate security and privacy measures to ensure that your personal information is kept secure.

We will also ensure that any 3rd party to whom we send your data as outlined above, has the necessary processes and protocols in place to manage the security and protection of your data.

YOUR RIGHTS – ACCESS TO YOUR INFORMATION

You have the right to request a copy of the personal information that we hold about you. To do this, contact us at the email address listed below and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee and we will let you know what it is at the time of request.

CORRECTION OF YOUR INFORMATION

In certain instances, you have the right to object to the processing of your personal information. You also have the right to ask us to update your information and ask us to correct or delete your personal information if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or if it was obtained unlawfully. You may do so by contact us at the email address listed below.

Where we cannot delete your personal information, we will take all reasonable steps to de-identify it.

CHANGES TO THIS NOTICE

Please note that this Notice may change from time to time.

HOW TO CONTACT US

If you have any queries regarding this Notice or if you require further information about our privacy practice, please contact us at:

privacy@evolutiongroup.co.za

INFORMATION REGULATOR

You also have the right to make enquiries or lodge complaints with the Information Regulator.

<https://www.justice.gov.za/info>

Tel: 012 406 4818

Fax: 086 500 3351