



GARRUN GROUP

POPI POLICY

2018

Your Business Made Personal



1. INTRODUCTION

- 1.1. The Garrun Group is a group of Short-Term Insurance Intermediaries who are obliged to comply with The Protection of Personal Information Act ('POPI').
- 1.2. POPI requires The Garrun Group to inform their clients as to how their Personal Information is used, disclosed and destroyed.
- 1.3. The Garrun Group guarantees its commitment to protecting their client's privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.4. This Policy sets out how The Garrun Group deals with their client's Personal Information and in addition for what purpose said information is used for. This Policy is made available on our company website www.garrun-group.co.za and by request at any of our branches.
- 1.5. This Policy is drafted in conjunction with the Financial Intermediary Association's ('FIA') Protection of Personal Information Notice.

2. THE PERSONAL INFORMATION COLLECTED

- 2.1. Section 9 of POPI states that *"Personal Information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive."*
- 2.2. The Garrun Group collects and processes clients Personal Information pertaining to clients Financial Needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the client what information they are required to provide us with and what information is optional. Examples of the Personal Information we collect includes but is not limited to:



- Clients Identity number, name, surname, address, postal code, marital status and how many dependents they have;
- Description of clients' residence, business and assets; and
- Any other information required by us, suppliers and Insurers in order to provide clients with an accurate Analysis of their Insurance needs.

2.3. The Garrun Group also collects and processes clients Personal Information for marketing purposes to ensure our products and services remain applicable to our clients and potential clients.

2.4. We have agreements in place with all our Product Suppliers, Insurers and third-party Service Providers to ensure there is a mutual understanding with regard to the protection of Client Personal Information. Our suppliers are subject to the same regulations as we are subjected to.

2.5. With client's consent, we may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalized experience in clients' interaction with us.

2.6. For purposes of this Policy, clients included Potential and existing clients.

3. HOW PERSONAL INFORMATION IS USED

3.1. Client's Personal Information will only be used for the purpose for which it was collected and agreed. This may include:

- Providing products or services to clients and to carry out the transactions requested;
- For underwriting purposes;
- Assessing and Processing claims;
- Conducting credit reference searches or verification;
- Confirming, verifying and updating client's details;
- For purposes of claims history;



- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
- Providing communications in respect of The Garrun Group and regulatory matters that may affect clients; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

3.2. According to section 10 of POPI Personal Information may only be processed if certain conditions are met which are listed below along with supporting information for Garrun processing of Personal Information:

- 3.2.1. Client consents to the processing – consent is obtained from clients during the introductory, Appointment and Needs Analysis stage of our relationship;
- 3.2.2. The processing is necessary – in order to conduct an accurate Analysis of clients Insurance needs certain Personal information is required;
- 3.2.3. Processing complies with an obligation imposed by law on the Garrun Group – The Financial Advisory and Intermediary Services Act ('FAIS') requires Financial Service Provider's ('FSPs') to conduct a Needs Analysis and obtain information from clients about their Insurance Needs in order to provide them with applicable and beneficial products;
- 3.2.4. Processing protects a legitimate interest of the client – it is in the client's best interest to have a full and proper Needs Analysis performed in order to provide them with an applicable and beneficial product, this requires obtaining Personal Information;
- 3.2.5. Processing is necessary for pursuing the legitimate interests of the Garrun Group or of a third party to whom information is supplied – in order to provide our clients with products both ourselves and our Product suppliers and



insurers need certain Personal Information from the clients to make an expert decision on the unique and specific product they require.

4. DISCLOSURE OF PERSONAL INFORMATION

- 4.1. We may disclose clients' Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.
- 4.2. We may also share client Personal Information with and obtain information about clients from third parties for the reasons already discussed in 2.4 above.
- 4.3. We may also disclose clients' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

5. SAFEGUARDING CLIENTS INFORMATION

- 5.1. It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your Personal Information is secure.
- 5.2. The following procedures are in place in order to protect your Personal Information. This list is not exhaustive:

- 5.2.1. **THE GARRUN GROUP INFORMATION OFFICER** is Benita Debra Porobich whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI. She is assisted by Alison Van Niekerk who will function as the Group's Deputy Information Officer;



- 5.2.2. **THIS POLICY** has been put in place throughout the Garrun Group and training on this policy and the POPI Act takes place annually;
- 5.2.3. **EMPLOYMENT CONTRACTS** containing clauses pertaining to POPI have been drafted;
- 5.2.4. Our archived client information is stored at either an offsite third-party provider or safely in our own offices;
- 5.2.5. All electronic files are **BACKED UP BY AN AUTHORSIED IT PROVIDER** who is also responsible for system security which protects third party access and physical threats.
- 5.2.6. **A SECURITY INICDENT MANAGEMENT REGISTER** is kept to log any security incidents and to report on and manage said incidents;
- 5.2.7. **A PROCEDURE MANUAL** has been drafted and to ensure all employees follow the Garrun Group's Professional Procedures to ensure Client information is processed accurately and securely; and
- 5.2.8. **CONSENT** to process client information is obtained from clients (or a person who has been given authorisation from the client to provide the client's Personal Information) during the Introductory, Appointment and Needs Analysis stage of the relationship.
- 5.2.9. **SHREDDERS** are placed within the offices, to ensure proper destruction of personal information that is printed for whatsoever reason.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- 6.1. Clients have the right to access the Personal Information we hold about them. Clients also have the right to ask us to update, correct or delete their Personal Information on reasonable grounds. Once a client objects to the processing of their Personal Information, The Garrun Group may no longer process said Personal Information. We



will take all reasonable steps to confirm our clients' identity before providing details of their Personal Information or making changes to their Personal Information.

6.2. The details of our Information Officer and head office are as follows:

6.2.1. INFORMATION OFFICER DETAILS

- 6.2.1.1. NAME: BENITA DEBRA POROBICH
- 6.2.1.2. TELEPHONE NUMBER: 011 694 5039
- 6.2.1.3. POSTAL ADDRESS: P.O. BOX 92337 NORWOOD 2117
- 6.2.1.4. PHYSICAL ADDRESS: 33 CENTRAL STREET HOUGHTON 2198
- 6.2.1.5. E-MAIL ADDRESS: BENITA@GARRUN-GROUP.CO.ZA

6.2.2. DEPUTY INFORMATION OFFICER DETAILS

- 6.2.2.1. NAME: ALISON VAN NIEKERK
- 6.2.2.2. TELEPHONE NUMBER: 011 694 5051
- 6.2.2.3. POSTAL ADDRESS: P.O. BOX 92337 NORWOOD 2117
- 6.2.2.4. PHYSICAL ADDRESS: 33 CENTRAL STREET HOUGHTON 2198
- 6.2.2.5. E-MAIL ADDRESS: ALISON@GARRUN-GROUP.CO.ZA

6.2.3. HEAD OFFICE DETAILS

- 6.2.3.1. TELEPHONE NUMBER: 011 694 5000
- 6.2.3.2. FAX NUMBER: 086 242 1310
- 6.2.3.3. *POSTAL ADDRESS: P.O. BOX 92337 NORWOOD 2117*
- 6.2.3.4. PHYSICAL ADDRESS: 33 CENTRAL STREET HOUGHTON 2198
- 6.2.3.5. E-MAIL ADDRESS: INFO@GARRUN-GROUP.CO.ZA
- 6.2.3.6. WEBSITE: WWW.GARRUN-GROUP.CO.ZA

7. AMENDMENTS TO THIS POLICY

7.1. Amendments to this Policy will take place on an *ad hoc* basis or at least once a year. Clients are advised to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.