

Becandsure presents the company's Privacy policy, effective as of 1 June 2021 and set to be reviewed annually. This policy will be downloadable from the company's website and be freely available to all employees and clients of Becandsure.

The Protection of Personal Information Act 4 of 2013 (POPIA) was enacted to give effect to the constitutional right to privacy, it also provides a framework for striking a balance between privacy and the protection of other important interests, including the free flow of information within South African and across international borders.

1. BACKGROUND AND PURPOSE

This policy is based on and compiled in accordance with the Protection of Personal Information Act No. 4 of 2013. The Act serves to promote & regulate the protection of Personal Information processed by public & private bodies in harmony with international standards, in a manner that gives effect to privacy subject to justifiable limitations aimed at protecting other rights & important interests

Policies are a mechanism for controlling the behaviour of an organisation by governing the behaviour of people who work within that organisation. Policies exist to ensure, in a given situation, that people will behave in a way that is predictable, advisable and in the best interests of the organisation and the person. The purpose of this document is to set out Becandsure's policy in respect of the collection of personal and private information, client consent, the processing, storing and retention of such information, as well as the eventual destruction thereof.

This policy is used to ensure compliance with laws relating to personal information and privacy and works in the interest of the clients, employees and the organisation.

Becandsure (Proprietary) Limited, Registration Number 2018/065405/07

(hereafter referred to as "Becandsure Financial Services", "we", "us", "our") recognises the importance of protecting your privacy in respect of your Personal Information that we collect when you use our services.

2. AUDIENCE

This policy applies to all visitors to our website and clients who use our services.

3. PRINCIPLE

The Privacy Policy's underpinning principle is:

To create a balance between protecting our legitimate business interests and meeting your reasonable expectation of privacy. Accordingly, we will take reasonable steps to prevent unauthorised access to or disclosure of your Personal Information. However, we do not guarantee that your Personal Information will be 100% secure.

All queries regarding privacy and personal information matters shall be considered by Carolina N Njuguna, available at carolinen@becandsure.co.za or +27 794841798

By accessing, browsing or using our Website or any of our Services, you consent to the data practices as described in this Privacy Policy and you acknowledge that you have read, understood and agree to be bound by the terms and conditions provided both on our Website and in this Privacy Policy.

4. KEY DEFINITIONS

4.1 "Personal information" (PI) includes:

Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;

- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature of further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

4.2 "Privacy" means:

- a) Right to be left alone
- b) Right to protection against the unlawful collection, retention, discrimination and use of personal information
- c) Personal information used for specific purpose only
- d) Keep Personal information accurate & confidential

4.3 "Processing" means:

Any operation/activity/any set of operations, whether / not by automatic means, concerning personal information, including:

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, restriction, degradation, erasure or destruction of information

5. THE INFORMATION WE COLLECT

Your personal information is collected and processed mainly to contact you for the purposes of delivering our services. For this purpose we will collect contact details including your name and organisation. We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us, how it will be used and what information is optional.

Website usage information may be collected using "cookies" which allows us to collect standard internet visitor usage information.

6. THE USE OF YOUR INFORMATION

Your personal information will be used only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

We may use your Personal Information:

- a) To gather contact information;
- b) To provide our services to you;
- c) To create and administer your account;
- d) To provide you with notifications and/or reminders relating to the Services;
- e) To confirm and verify your identity or to verify that you are an authorised user for security, administrative and legal purposes;
- f) for customer relations purposes;
- g) for the purpose of website analytics;
- h) to assist us in any future dealings with you;
- i) to ensure network and information security;
- j) to prevent and detect fraud and other criminal offences;
- k) for use during legal proceedings;
- l) to provide technical and other support to you;
- m) to host and maintain our Website and Services;
- n) to do marketing;
- o) for internal operations and administrative purposes; and
- p) as otherwise legally permitted.

7. INFORMATION SECURITY

Personal information is protected using computer safeguards such as firewalls and data encryption, and access to personal information is only authorised for those employees who require it to fulfil their job responsibilities.

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an on-going

basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- a) Physical security;
- b) Computer and network security;
- c) Access to personal information;
- d) Secure communications;
- e) Retention and disposal of information;
- f) Acceptable usage of personal information;
- g) Governance and regulatory issues;
- h) Monitoring access and usage of private information;
- i) Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

8. RETENTION OF PERSONAL INFORMATION

Personal information will only be retained for as long as it is necessary to fulfil the purposes for which it was collected or subsequently Processed, unless the requirements are different in instances as set out below.

- a) We are required or authorised by law to keep your Personal Information for a longer period.
- b) Lawful purposes. We require the Personal Information for lawful purposes relating to our functions or activities.
- c) Legal rights. We require the Personal Information to exercise or defend our legal rights.
- d) We require the Personal Information for historical, statistical or research purposes (such information will be anonymised).
- e) We require the Personal Information as a result of our contract with you.

9. YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION

You can exercise any of the following choices:

- a) Amount of information. Limit the amount of information you provide to us, keeping in mind that certain of our Services may not function properly with limited information.
- b) Set your browser to reject cookies, keeping in mind that this may cause certain of our Services not to function properly.
- c) Opt out. Opt out of any marketing communication from us, keeping in mind that we will still be sending you a few necessary accounting and legal notices.
- d) Close your account with us, keeping in mind that we may still be required or authorised by law to retain some of your information.

You have the following rights relating to your Personal Information that we Process:

- a) You can request that we give you information about your Personal Information that we hold and/or Process.
- b) Correct or delete. You can request that we correct or delete your Personal Information or parts thereof that are, in your opinion, inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- c) You can object to the further Processing of your Personal Information (or specific parts thereof).
- d) You have the right to request updated, correcting or deleting of your personal information. A copy of your ID document is required to confirm your identity before making changes to personal information we may hold about you. Please keep your personal information accurate.

10. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy will be published on our Website. It remains your responsibility to check the Website from time to time and to refer to the "Effective Date" at the beginning of the Privacy Policy. If you continue using our services after the Effective Date, it means that you consent to the amended Privacy Policy.

11. ENQUIRIES

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please feel free contact us.