

PROTECTION OF PERSONAL INFORMATION ACT (POPIA) COMPLIANCE MANAGEMENT PROCEDURE PINFOLD AGENCY (PTY) LTD t/a THE EXECUTIVE BROKERS

FSP 3966

Company Registration Number: 1981/009933/07

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INTRODUCTION

The Protection of Personal Information Act 4 of 2013 ("POPIA") is South Africa's comprehensive data protection legislation. POPIA came fully into force on **1 July 2021**, and all organisations that process personal information are required to comply with its provisions.

POPIA applies to the processing of personal information by both public and private bodies and seeks to give effect to the constitutional right to privacy while balancing this right against legitimate commercial and public interests.

This procedure sets out how The Executive Brokers complies with POPIA when processing personal information relating to clients, employees, suppliers, and other data subjects.

COMPANY PRIVACY POLICY

The Executive Brokers is committed to protecting the confidentiality, integrity, and availability of personal information processed while providing financial advice, intermediary services, and related support services.

We process personal information lawfully and in a reasonable manner that does not infringe the privacy of data subjects, in accordance with the eight conditions for lawful processing as set out in POPIA.

Personal information is collected and processed for the following purposes:

- Providing appropriate financial advice and intermediary services
- Assessing clients' financial needs, objectives, and product suitability
- Acquiring, administering, maintaining, and servicing financial products
- Meeting legal, regulatory, and contractual obligations

Personal information will only be shared:

- With the consent of the clients;
- With insurers, underwriters, reinsurers, service providers, or industry bodies where required to fulfil the stated purpose; or
- Where required or permitted by law.
- Claim information is however shared on an industry wide basis.

LAWFUL BASIS AND CLIENT CONSENT

The Executive Brokers processes personal information on one or more lawful bases as permitted by POPIA, including consent, contractual necessity, legal obligation, and legitimate interests.

We undertake to:

- Obtain consent from clients where required by POPIA;
- Clearly explain the purpose for which personal information is collected;
- Not collect excessive or irrelevant personal information;
- Not sell personal information to third parties for marketing or other unrelated purposes;
- Use personal information only for the purpose for which it was collected or for a compatible purpose.

Clients retain the right to withdraw consent, subject to legal and contractual record-keeping requirements.

SECURITY SAFEGUARDS: ELECTRONIC INFORMATION

The Executive Brokers implements appropriate, reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised access, or unlawful processing.

These measures include, but are not limited to:

- Firewalls and network security controls
- Password protection and access controls on all systems
- Anti-virus and anti-malware software
- Encryption of laptops and portable devices
- Regular system updates and security patches
- Secure off-site data backups
- Controlled remote access to systems
- Employee cyber-security awareness training

Third-party IT service providers are required to contractually commit to POPIA compliance and information security obligations.

SECURITY SAFEGUARDS: MANUAL AND HARDCOPY RECORDS

To protect manual and paper-based records, the following measures are enforced:

- Secure storage of files in locked cabinets or rooms
- Restricted access on a need-to-know basis
- Clean-desk policy
- Controlled copying and printing of documents
- Secure destruction of records by shredding or equivalent methods

DATA BREACH MANAGEMENT

A personal information breach includes any unauthorised access to, disclosure of, or loss of personal information.

In the event of a data breach, The Executive Brokers will:

- Immediately assess the nature and extent of the breach;
- Take steps to contain and mitigate the breach;
- Notify the Information Regulator and affected data subjects as soon as reasonably possible, as required by section 22 of POPIA;
- Provide sufficient information to enable affected data subjects to take protective measures.

THIRD-PARTY OPERATORS AND SUPPLIERS

All operators (as defined in POPIA) who process personal information on behalf of The Executive Brokers must:

- Be subject to written agreements ensuring POPIA compliance;
- Implement appropriate security safeguards;
- Process personal information only with authorisation and for agreed purposes.

The Executive Brokers remains accountable for personal information processed by operators on its behalf.

EMPLOYEES AND STAFF INFORMATION

Personal information relating to employees and job applicants is processed lawfully and confidentially.

- Consent will be obtained for reference, credit, or criminal checks where required;
- Employee information will be accessed only by authorised personnel;
- Employment records will be securely stored and retained in line with labour and statutory requirements.

INFORMATION OFFICER

The Executive Brokers hereby appoints **Madelein Muir** as the internal Information Officer in terms of POPIA.

The Information Officer is responsible for:

- Ensuring POPIA compliance;
- Developing, updating, and implementing data protection policies;
- Training staff on data protection obligations;
- Monitoring compliance and managing data breaches;
- Liaising with the Information Regulator.

Deputy Information Officers may be appointed and registered with the Information Regulator where necessary.

RIGHTS OF CLIENTS

Clients have the right to:

- Access their personal information;
- Request correction or deletion of information;
- Object to processing on reasonable grounds;
- Lodge a complaint with the Information Regulator.

Requests will be handled in accordance with POPIA and applicable legislation.

INFORMATION REGULATOR CONTACT DETAILS

Information Regulator (South Africa)

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Email: infoereg@justice.gov.za

Website: www.justice.gov.za/infoereg

This Compliance Management Procedure is reviewed periodically and updated as required to ensure ongoing compliance with POPIA.