

## THE PROTECTION OF PERSONAL INFORMATION ACT

### PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

At TransferMe we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

#### Definition of personal information

The term 'personal information', as used in this notice, applies to information that may be used to identify an individual or a juristic person (i.e. for example a registered company).

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person to whom personal information relates is referred to as the "data subject".

#### The information we collect

Examples of personal information include, but are not limited to, contact information, identity number, passport number, financial information, tax number, information relating to race, gender, age, occupation, qualifications, employment details, residency status, marital and family history, policy, location information.

We collect information directly or indirectly (e.g. through a broker, financial advisor, agent acting on your behalf) where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

The company collects information either directly or indirectly from you, the data subject, the employer or through financial services intermediaries. In certain instances, we may also collect information about you from other sources such as external third parties and from cookies on our website. The source from which personal information was obtained, if not directly from the data subject, will be disclosed.

#### How we use your information

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will use your personal information 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.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- For audit and record keeping purposes;
- Complying with the obligations contained in the contract concluded between yourself and the FSP
- Providing you with advice, products and services that suit your needs as requested
- To notify you of new products or developments that may be of interest to you
- To confirm, verify and update your details
- Fulfilling a transaction on request of a data subject
- To comply with any legal and regulatory requirements

## Disclosure of information

TransferMe may need to share your personal information to third parties, provide advice, reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The Compliance Officer of the organisation;
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority;

We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

## Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized 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.

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.

## Your Rights: Access to information

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed;
- Request that we consider your objections to the processing of your personal information;
- Lodge a complaint with the Information Regulator, <https://www.justice.gov.za/inforeg/index.html>

To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require.

## How to contact us

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website.



TransferMe

TransferMe (Pty) Ltd | [www.transferme.co.za](http://www.transferme.co.za) | [admin@transferme.co.za](mailto:admin@transferme.co.za) | T: +27 44 020 0414 | M: +27 73 206 2896  
Office number 4, Plett One Building, Cnr of Marine and High Street, Plettenberg Bay, 6600

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