

## PHOENIX RISK SOLUTIONS (PTY) LTD

### POPIA PRIVACY NOTICE

#### Protection of Personal Information Act (“Popia”)

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer’s Contact Details	
Name	TRACY LEPPAN
Contact Number	021 7027960
Email Address:	info@phoenixrisk.co.za

#### Our details:

The Organisation : Phoenix Risk Solutions (Pty) Ltd

Juristic Representatives : Phoenix Central (Pty) Ltd  
 : Phoenix IDRS (Pty) Ltd  
 : PIB Risk Services (Pty) Ltd  
 : Phoenix West Insurance Brokers (Pty) Ltd  
 : Za’Khele Phoenix Financial Services

Physical Address : 39 Tokai Road, Tokai, 7965

Organisation e-mail address : info@phoenixrisk.co.za

The Organisation is an authorised financial services provider with FSP Number 10150.

We render financial services in the following product categories:

- (a) 1.2 Short-term Insurance : Personal Lines
- (b) 1.23 Short-term Insurance : Personal Lines A1
- (c) 1.6 Short-term Insurance : Commercial Lines

#### The source of collection of your personal information:

We collect personal information directly from the following data subjects:

- Prospective clients who enquire about our financial services
- Clients who have appointed the representative as their broker
- Policyholders who enter into a policy with an insurer via the Organisation

Personal information is collected directly from you through the completion of :

- An application form
- Online forms
- Information as provided to our Representatives during consultation and/or by email/Postal correspondence.

These forms and/or information is completed either electronically or in hard copy. You may also be requested to provide your personal information during your consultation with a representative.

We may also collect information about you from other sources such as external third parties and from cookies on our website.

#### **Law authorising or requiring collecting of the personal information:**

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Insurance Act 18 of 2017;
- Short-Term Insurance Act 53 of 1998;

#### **Purpose for Processing 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 only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and Phoenix Risk Solutions (Pty) Ltd.
- Providing you with advice, products and services that suit your needs as requested
- To verify your identity and to conduct credit reference searches
- To issue, administer and manage your insurance policies
- To process insurance claims and to take recovery action
- To notify you of new products or developments that may be of interest to you
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, residency status, your assets, liabilities, insurance and your banking details.

Some of the aforementioned personal information may be mandatory to provide within the context of product providers' underwriting requirements and disclosures.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider.

#### **Third parties and your personal information**

We may need to share your 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;
- If you have entered into a Short-Term Insurance Policy, the Organisation may use, store, transfer, disclose or share your information as part of its statutory and reporting obligations with:
  - Our Product Suppliers to conduct market research and provide you with information on their products and services and assist with concluding contracts on your behalf.
  - Our employees, Representatives and Agents which process information on our behalf.
  - Third Parties used to confirm and verify your identity
  - Our partners such as system implementers, independent software developers
  - Our Service Providers for the Assessing and Processing of your claims
  - Service Providers to conduct credit reference searches or verification
  - Verification Agents for the detection and prevention of fraud, crime, money laundering or other malpractice
  - Third Parties used to facilitate the collection of premiums and/or payment transactions.

#### **The Transfer of your personal information outside of the Republic of South Africa**

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. The third-party service providers are located in:

- ***Not applicable - Phoenix Risk Solutions (Pty) Ltd Service Provider hosting our servers are maintained in South Africa***

#### **Complaints and objections**

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 (please complete Annexure A);
- Request that we consider your objections to the processing of your personal information (please complete Annexure B);
- Lodge a complaint with the Information Regulator (please complete Annexure B).

#### **The Information Regulator**

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

- The Information Regulator: Adv Pansy Tlakula
- Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)
- Website: <https://www.justice.gov.za/inforeg/index.html>

**PERSONAL INFORMATION REQUEST FORM**

**Please submit the completed form to the Information Officer:**

Name	
Contact Number	
Email Address:	

Please be aware that we may require you to provide proof of identification prior to processing your request. There may also be a reasonable charge for providing copies of the information requested.

**A. Particulars of Data Subject**

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

**B. Request**

I request the organisation to:

(a) Inform me whether it holds any of my personal information	<input type="checkbox"/>
(b) Provide me with a record or description of my personal information	<input type="checkbox"/>
(c) Correct or update my personal information	<input type="checkbox"/>
(d) Destroy or delete a record of my personal information	<input type="checkbox"/>

**C. Instructions**


**D. Signature Page**

Signature
Date

**POPI COMPLAINT FORM**

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

**Please submit your complaint to the Information Officer:**

Name	
Contact Number	
Email Address:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

**The Information Regulator:** Adv Pansy Tlakula

**Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

**Email:** complaints.IR@justice.gov.za

**Website:** <https://www.justice.gov.za/infoereg/index.html>

**A. Particulars of Complainant**

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

**B. Details of Complaint**


**C. Desired Outcome**


**D. Signature Page**

Signature:	
Date	