



## Privacy Policy

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Responsible Business Unit	Compliance

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## About this Privacy Policy

This Policy sets out the categories of personal information that Chartered Employee Benefits (Pty) Ltd (“CEB”) may collect from you as well as how CEB processes and protects that personal information.

If you have any questions regarding this Policy or your personal information, please see our contact details below. CEB may amend this Policy from time to time and it is your responsibility to ensure that you are aware of any changes that may have been made. Should CEB make any material changes to this Policy, we will notify you.

## Our Contact Details

Should you have any questions or require any further information, you may contact us at:

**Information Officer**

Chartered Employee Benefits  
4 North Road  
Dunkeld West  
Johannesburg  
2196

E-Mail: [Compliance@charteredebe.co.za](mailto:Compliance@charteredebe.co.za)  
Tel: +27(0) 11 502 2800

Chartered Employee Benefits (Pty) Ltd (1999/021569/07) is a registered Financial Service Provider (FSP No. 24323).

## What information do we collect from you?

CEB may collect the following information from you for the purposes outlined below:

- A list of product or services that you express an interest in.
- Your name, address, date of birth, place of birth, identity/passport number, marital details, gender, residency details, education, bank details, details about your employment, tax information and financial information.
- Record of correspondence from you or anyone acting on your behalf.
- Details on transactions you carry out with us.

To the extent permissible by law, CEB may implement systems designed to intercept and monitor your communications with CEB’s Associates. As part of this process of intercepting and monitoring these communications, we may record such communications for disclosure on the basis set out in this Policy.

You undertake not to provide us with any Personal Information relating to any other person without their prior and express consent. It is your responsibility to ensure that the

information we have on record is accurate, up to date and complete and you will notify us of any changes to this information.

We will take reasonably practicable steps to ensure that your Personal Information that we hold is complete, accurate, not misleading and updated where necessary.

## How and why do we collect your information?

CEB may collect your information in several ways that include:

### 1. Information that you volunteer

During the onboarding process, you may be required to provide certain information to enable CEB to process your information to:

- Provide you with the product(s)/service(s) that you have requested, managing our relationship with you, acting on your instructions and notifying you of any changes to our services.
- Verify your identity in terms of our obligation under the Financial Intelligence Centre Act, 38 of 2001.
- Detect and prevent fraud to the extent that we are able to do so.
- Comply with any laws or regulations, including law enforcement, government and tax collection agencies, treaties, and codes.
- Monitoring and/or recording your telephone calls, electronic communications and electronic transactions with us in order to accurately carry out your instructions and to ensure the level of service we provide is of the highest standard and complies with any legislation/regulations;
- Assist in improving our products and/or services; and
- Refer you to one of the companies CEB is associated with (i.e. Chartered Wealth Solutions (Pty) Ltd).

### 2. Intercepted communications

Throughout the course of the relationship, CEB may intercept and record your information as mentioned above to accurately carry out your instructions, ensure the level of service provided is of the highest standard and comply with any legislation/regulations.

### 3. Automatic collection

As and when you make use of the Website, CEB automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. We treat this data as non-personal information, except where we are compelled to by law or legal authority.

CEB only aggregate this data to better understand the traffic to the Website and how we may improve the Website.

### 4. Cookies

CEB does not make use of any cookies or track visitor behaviour to the Website nor does CEB record or store any visitor information other than that information which the visitor volunteers by way of completing an expression of interest form.

**As a data subject, you have the right to object to CEB processing your personal information. Should you wish to exercise this right, please contact CEB at the details provided above.**

We may contact you from time to time about products and/or services that are available from Chartered-Related Companies which we believe may be of interest to you. We may do this by post, telephone or email unless you have indicated otherwise.

#### How long do we store your information?

CEB is required to ensure that your personal information is accurate and maintained in a secure environment for a period no longer than is necessary for the purposes for which we are processing your personal information.

Generally, this means that CEB will retain your information for a period of 5 years after the termination of our services with you. However, CEB may be required to retain your information for longer where we are required to do so for tax, legal, regulatory, complaints or accounting purposes.

#### Sharing your personal information

During the relationship, CEB may disclose your information to the following third parties:

- CEB's associated companies.
- Third parties that provide CEB with services, including technical support, products, hosting services, reporting services and general services that may be related to the product/service that we provide you.
- Professional advisers, judicial, regulatory and law enforcement bodies; and
- A third party that may acquire all or part of our assets or shares, or that succeeds us in carrying on all or part of our business.

We will not share your Personal Information with any party without your prior written

consent, except where we are required to do so by law. We will inform you prior to disclosing Personal Information to a third party unless the law/regulation prohibits this.

We will immediately inform you should we become aware of unauthorised access to your Personal Information. We confirm that we have the technical and organisational measures in place to protect your Personal Information.

Where we subcontract to a third party to process Personal Information, we will remain fully responsible for ensuring the protection and integrity of your Personal Information.

We may transfer your information outside of South Africa to countries which may not offer the same level of protection as South Africa, including but not limited to, cloud storage, financial planning tools, and other software. Where this is the case, we will ensure that anyone to whom we pass your information agrees to apply the same level of data protection as if we were dealing with it. Where we are compelled by law to transmit your information to a government body or withholding agent in another country, we will be obliged to transmit your information irrespective of any agreement and the level of protection afforded by such country.

We will ensure the integrity, confidentiality and security of the Personal Information that we process.

### Accessing your personal information

In terms of the Promotion of Access to Information Act, 2 of 2000, you have the right to request the details of your personal information that we hold. The fees associated with such request are prescribed in terms of this Act. Confirmation of whether we hold your personal information may be requested free of charge. For further information on how to request access to your personal information, please review our Promotion of Access to Information Act Manual at [Chartered Employee Benefits - Bridging the Gap \(charterdeb.co.za\)](http://charterdeb.co.za)

### Your data protection rights

In terms of the Protection of Personal Information Act, 4 of 2013 and the Promotion of Access to Information Act, 2 of 2000, you have the right to:

- Request that your Personal Information which we have collected be corrected, reduced, returned, or deleted, subject to any other law/regulation that may require CEB to retain such information.
- Access your personal information that we hold. CEB shall grant access to the aforementioned personal information during office hours and within a reasonable time after receiving a written request for access.

### Complaints

Should you have an issue with CEB processing your personal information or would like to make a complaint in relation to the personal information held and processed by CEB you may contact CEB Information Officer. Alternatively, you may contact the Information Regulator.

**Information Officer**

Chartered Employee Benefits  
4 North Road  
Dunkeld West  
Johannesburg  
2196

E-Mail: [Compliance@chartereb.co.za](mailto:Compliance@chartereb.co.za)  
Tel: +27(0) 11 502 2800

**The Information Regulator**

JD House, 27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

E-Mail: [POPIAcomplaints@infoeregulator.org.za](mailto:POPIAcomplaints@infoeregulator.org.za)  
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