

## **PRIVACY AND SECURITY POLICY**

### **About Us**

**VENTER VAN EEDEN INC.** is dedicated to protecting the privacy and confidentiality of its clients and takes the responsibility regarding the security of data in its possession and under its control seriously. **VENTER VAN EEDEN INC.** abides by the provisions of the Protection of Personal Information Act (“**POPIA**”), of 2013 and is upheld by the Information Officer (IO). This includes processing any personal information lawfully, fairly and in a transparent manner. POPIA gives effect to the constitutional right to privacy, by safeguarding personal information when processed by a responsible party, subject to justifiable limitations. There are several conditions that have to be met to ensure that personal information is vastly protected.

POPIA can be obtained from **VENTER VAN EEDEN INC.** by e-mailing [info@vve.co.za](mailto:info@vve.co.za).

This ***Privacy and Security Policy*** explains how and what type of personal information will be collected, processed and used during and following your visits to the **VENTER VAN EEDEN INC.** website and during the course of doing business with you, why it is collected, with whom it is shared and your rights in this regard.

To enable **VENTER VAN EEDEN INC.** to deliver services and to attain the highest level of client service, it is critical for **VENTER VAN EEDEN INC.** to obtain accurate, up to date and timely information about its clients while protecting the confidentiality and privacy of such information. **VENTER VAN EEDEN INC.** will comply with this *Privacy and Security Policy* and will not otherwise distribute your personal information without notifying you in advance.

This *Privacy and Security Policy* applies to any information obtained by **VENTER VAN EEDEN INC.** using the **VENTER VAN EEDEN INC.** website. It does not apply to any website controlled by third parties not affiliated with **VENTER VAN EEDEN INC.** that the **VENTER VAN EEDEN INC.** website may link to.

The terms of this *Privacy and Security Policy* are subject to any additional terms, disclaimers, or other contractual terms you have entered into with **VENTER VAN EEDEN INC.** and any mandatory laws and regulations.

### **WHO IS THE DATA RESPONSIBLE PARTY?**

A responsible party is the public or private body or any other person who alone or in conjunction with others, determines the purpose of and means for processing personal information. The party who controls (the controller) and is responsible to keep and use personal information is the responsible party in relation to the specific personal information.

### **WHO IS THE DATA OPERATOR PARTY?**

A person who processes personal information for or on behalf of the responsible party in terms of a contract or mandate (without coming under the direct authority of the responsible party).

#### **WHAT PERSONAL INFORMATION IS COLLECTED?**

For **VENTER VAN EEDEN INC.** to provide you with the requested and or required products and services, your personal information will need to be processed. **VENTER VAN EEDEN INC.** will collect information from you, your broker and / or from external sources.

The personal information collected may include:

- Your contact details such as name, physical addresses, phone numbers
- Your marital status, employment status, proof of residency
- Government identifiers such as driving licence number
- Location information
- Machine identifiers including IP address
- Information about how you interact with **VENTER VAN EEDEN INC.**, the website and **VENTER VAN EEDEN INC.** services
- Your payment and banking details in order to complete your purchase / sale of immovable property
- Information about others who will be or are included on your transfer of sale or purchase, or bond registration or bond cancellation
- Information on your property, some of which will be collected from external databases. Example includes Deeds Office searches.

Examples of special personal information collected may include:

- Your medical information
- Criminal and / or convictions and / or judgements.

**VENTER VAN EEDEN INC.** may also collect information about you which is automatically provided by "cookies" when you access the website. "Cookies" are a small data file consisting of encrypted information assigned to a computer, mobile or other device when using a website to recognise repeat users, facilitate the user's access to and use of a website and allow a website to track usage behaviours and compile aggregated data that allows a website to optimise functionality of the website and improve its content. The type of information collected by cookies is not used to personally identify users. There is a simple procedure in the browser that allows users to accept or reject cookies.

Cookies are used to identify which areas of a website are more frequently visited and enable **VENTER VAN EEDEN INC.** to deliver content that is specific to the need of users and may be necessary to provide users with certain features available on the website. **VENTER VAN EEDEN INC.** can thus provide a more valuable

online experience with the information received. Although cookies can be disabled by you, this may influence the functioning of the website and is not recommended.

The confidentiality, access to or dissemination of information which is retrieved by using "cookies" or information retrieved through the collecting and storing of IP addresses (an address assigned to your computer or server identifying it when conducting Internet activity) of visitors to this website is not in the control of **VENTER VAN EEDEN INC.**

If you provide personal information about another individual, you acknowledge that you have permission from that individual to do so and that they understand how it will be processed. We would strongly encourage that any individual, whose personal information you provide to read this *Privacy and Security Policy*.

#### **HOW PERSONAL INFORMATION IS COLLECTED**

Your personal information is collected when:

- details for a quotation are provided
- enquiries are made about our services through the website
- **VENTER VAN EEDEN INC.** services are used or those provided by our services partners
- interacting with **VENTER VAN EEDEN INC.** or making enquiries
- registering for information or other services
- responding to communications or a surveys
- **VENTER VAN EEDEN INC.** requests additional information from you for validation purposes
- You consent to the collection of personal information

#### **DRIVING LICENCE INFORMATION**

**VENTER VAN EEDEN INC.** may collect driving licence information as part of instituting or defending any legal application or action.

Driving licence number is used to do a check with the eNatis database, to retrieve the required information such as:

- Type of licence held
- Length of time licence has been held
- Entitlements to drive
- Convictions and / or charges
- Conviction dates
- Disqualifications (endorsement, suspension and / or cancellation of licence).

The data collected may be used in conjunction with other information.

- For anti-fraud purposes.

### **CREDIT REFERENCE**

When applying for an agency (as a broker), requesting a quotation and / or a policy, at renewal, and in certain circumstances where an amendment to your contract and / or agreement is requested, we make several checks to assess your application for credit and verifying identities to prevent and detect crime and money laundering. To obtain this information, we will check the following records about you and anyone else who may also be insured and whose personal details have been provided as part of any service request and / or application.

- Credit reference agencies records. A search from us will place a search footprint on your credit file that may be seen by other entities. Credit reference agencies supply both public, and shared credit and fraud prevention information.
- Fraud Prevention Agencies records.

The credit reference agencies will record details of the search whether or not your application proceeds. The searches will not be seen or used by lenders to assess your ability to obtain credit. Scoring methods are used to assess your application and to verify your identity.

Credit searches and other information which is provided to XXX and/or the credit reference agencies, about you and those with whom you are linked financially, may be used by XXX and other companies if you, or other members of your household, apply for other facilities including insurance and claims. This information may also be used for debt tracing and the prevention of money laundering as well as the management of your account. Alternatively, physical forms of identification may be requested from you.

If you provide XXX with false or inaccurate information and we suspect identify fraud, it will be recorded and may also be provided to Fraud Prevention Agencies and other organisations involved in the prevention of crime and fraud.

If it is determined that you pose a fraud or money laundering risk, we may refuse to provide the products and services you have requested, or to employ you, or we may stop providing existing products and services to you.

### **CALL RECORDING AND MONITORING**

All calls, emails, electronic messages, and other communications are recorded and monitored for:

- Business purposes such as quality control and training
- Processing necessary for entering or performance of a contract and / or agreement
- Prevention of unauthorised use of telecommunication systems and websites
- Ensuring effective systems operation

- Meeting any legal obligation
- Protecting your interests
- Prevention and detection of crime
- For the legitimate interests of the responsible party

#### **BANKING DETAILS – SECURE DATA EXCHANGE**

When you make use of our services, or during the course of your agreement and / or contract with VENTER VAN EEDEN INC., you may be asked to share access to your chosen bank and / or financial institution account data.

When you share your bank and / or financial institution account data with us, we will use the information you provide for the following purposes:

- To check the accuracy of other information you have provided to us
- To manage your ongoing relationship with us
- To help us prevent criminal activity and financial crime including fraud and money laundering and identity theft.

#### **HOW YOUR PERSONAL INFORMATION IS USED**

Personal information collected from you could be used for a wide range of reasons:

- Processing your quotation or mandate agreement with us.
- Administering your case, instruction or mandate.
- Communicate with you and others as part of our service and fulfilment of our instructions and mandate.
- Fraud detection and prevention
- Credit scoring or other decision-making
- Verifying your identity when required
- Undertaking market research, service development and statistical purposes
- To provide you and other clients with relevant information through the marketing programme
- Keeping you informed about new service developments by email, telephone, electronic communication, social media or post (dependent on your preferences)
- Send you important information regarding changes to our policies, other terms and conditions, the online services and other administrative information
- Provide marketing information
- Resolve complaints, and handle requests for data access or correction
- For assessment and analysis to enable us to review, develop and improve the services and products offered; and

#### **WHERE WILL COLLECTED PERSONAL DATA BE PROCESSED?**

Your personal data may be processed both inside and outside of South Africa. Whenever we transfer your personal data for processing outside of South Africa it is subject always to contractual restrictions regarding

confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorised to process them.

#### **DISCLOSURE OF PERSONAL INFORMATION**

VENTER VAN EEDEN INC. is committed to keeping your personal information confidential and shall not, at any time, process personal information for any purpose other than with the express prior consent or to the extent necessary to provide the services and / or products.

For the specific purposes your personal information may be disclosed to third parties which process data as operators, authorised agents, and / or third-party service providers.

VENTER VAN EEDEN INC. will not disclose your personal information without your consent unless:

- requested to do so by any regulatory authority and the regulators appointed by such regulatory authorities for the various financial and legal sectors.
- compelled in terms of a court order or by law
- it is in the public interest to do so
- to comply with any regulation passed under the relevant legislation, or any legal process; and
- it is to protect and defend VENTER VAN EEDEN INC's rights and property (including VENTER VAN EEDEN INC's intellectual property).

VENTER VAN EEDEN INC. shall notify you, if required by law:

- of any risks posed or any security compromises or suspected security compromises to personal information that it has identified
- of the safeguards established by VENTER VAN EEDEN INC. to mitigate the impact of the risks; and
- that the safeguards have been effectively implemented.

There are also some circumstances where VENTER VAN EEDEN INC. will share your personal information with external companies. At all times, privacy remains paramount and VENTER VAN EEDEN INC. will endeavour to minimise the data shared at every opportunity.

#### **International transfer of Personal Information**

Personal information is transferred across borders via cloud-computing to mitigate the personal information breach risks. VENTER VAN EEDEN INC. has taken reasonably practicable steps to ensure that the cloud-based service provider complies with the POPIA and VENTER VAN EEDEN INC. has an agreement with the services provider, aimed at ensuring that appropriate security for the protection of personal information is established and maintained.

These circumstances may include, but not limited to:

- Comparing our records with those of third parties.
- Sharing with regulatory or public bodies such as the FSCA, Financial Industry Ombudsmen.

## **INFORMATION SECURITY**

On any VENTER VAN EEDEN INC. online platform and/or website portal (“non-public online services”) your personal information is protected by providing you with a User ID and password in order to obtain information. We also use industry standard security to encrypt sensitive data in transit to our servers.

The User ID and password helps us to protect your personal information. You must keep this password safe and must not disclose it to anyone. Some suspicious emails contain attachments or links to websites that try to install malicious software on your computer. If you have entered your password on what you think might be a malicious website, please contact VENTER VAN EEDEN INC. immediately and ask us to change your password.

When you ask for a quotation from VENTER VAN EEDEN INC., we will process the data on a secure server. Your browser will confirm that you are in a secure area by displaying an unbroken key or lock in the bottom right-hand corner of your browser window.

Many organisations use security features such as firewalls to protect their computer systems. These firewalls may prevent you from connecting to our secure server to get a quotation. If you are at work and cannot connect to the VENTER VAN EEDEN INC. website, please speak to your IT administrator.

Please be aware that communications over the internet, such as emails, are not secure unless they have been encrypted. Your communications may route through several countries before being delivered - this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

VENTER VAN EEDEN INC. cannot guarantee the security of information that is transmitted to VENTER VAN EEDEN INC. electronically as such transmissions are susceptible to unlawful access or monitoring. Any electronic transmissions made by you to VENTER VAN EEDEN INC. are at your own risk.

Additionally, you can protect your system by installing anti-virus and running scans. You should also run any security updates or patches you receive for your system from the supplier.

Never respond to unsolicited emails from unfamiliar sources. Such emails may be fraudulent and attempt to get you to provide your personal details or payment information.

Only authorised employees, agents and representatives of VENTER VAN EEDEN INC. will have access to your personal information and all of VENTER VAN EEDEN INC's employees, service providers and marketing partners are bound by confidentiality agreements and obliged to comply with strict standards of privacy and confidentiality.

VENTER VAN EEDEN INC. shall take appropriate and reasonable technical and organisational measures to prevent the loss of or damage to or unauthorised destruction of data and the unlawful access to or processing of personal information. VENTER VAN EEDEN INC. will also ensure that all its systems and operations which it uses to provide the products and services, including all systems on which personal information is processed as part of providing the products and services, shall always be of a minimum standard required by all applicable laws and be of a standard no less than the standards which are in compliance with the best industry practice for the protection, control and use of data.

#### **RETENTION OF PERSONAL INFORMATION**

VENTER VAN EEDEN INC. will not retain your personal information for longer than is necessary and will hold it only for the purposes for which it was obtained.

#### **ACCESS TO INFORMATION**

The Promotion of Access to Information Act ("PAIA"), No 2 of 2002 embodies the constitutional right of access to any information held by any private or public body that is required for the exercise or protection of any rights. There are several requirements that have to be met prior to access to any information be granted.

PAIA requires that a manual be prepared to assist people in exercising their right of access to information. This manual can be obtained from VENTER VAN EEDEN INC. by e-mailing [admin@vve.co.za](mailto:admin@vve.co.za) or access it on the website.

You have several other rights as a data subject, which are explained below. Please be aware that these rights do not apply in all circumstances.

In order to object to the processing of personal information, the data subject must provide:

- Name and surname/registered name, unique identifier / identity number, residential, postal or business address, contact number(s) and email address of data subject, policy/claim number and reason for objection.

In order to request correction or deletion of personal information or destruction or deletion of record of personal information, the data subject must provide:



- Name and surname / registered name, unique identifier / identity number, residential, postal or business address, contact number(s) and email address of data subject, policy/claim number and information to be corrected/deleted/destroyed/destroyed and or reasons for this request.

Note that if your object or request involve the personal information of other people, or you are making a request on behalf of someone else (such as a parent on behalf of their child), we may need identification from these individuals, as well as a signed letter of authority (if relevant) from them confirming that they are comfortable with you to act on their behalf and for us to release their data to you (if relevant).

Once we have received the written request and identification documents, we will have 30 calendar days to fulfil your request.

If you have any queries about your rights, or believe that they have not been met by VENTER VAN EEDEN INC., please contact our Information Officer by email or by writing to: [admin@vve.co.za](mailto:admin@vve.co.za)

#### **Complaints relating to processing of your personal data**

If you have any complaints relating to the processing of your personal information, you also have the right to complain to the relevant Regulatory Authority. The Information Regulator can be contacted at:

#### **The Information Regulator (South Africa)**

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

**Complaints** email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**General enquiries** email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

#### **7. GENERAL PROVISIONS**

This *Privacy and Security Policy* does not include VENTER VAN EEDEN INC's terms and conditions of use of the website and users are advised to read such terms and conditions.

VENTER VAN EEDEN INC. reserves the right to unilaterally amend this *Privacy and Security Policy* without prior notice by publishing the amended Privacy and Security Policy on the VENTER VAN EEDEN INC. website. You will be deemed to have read and have full knowledge of the amended Privacy and Security Policy.

Although VENTER VAN EEDEN INC. has taken reasonable care in ensuring the accuracy of the information contained in this Privacy and Security Policy, VENTER VAN EEDEN INC. does not guarantee its accuracy at any time. VENTER VAN EEDEN INC. will not be liable for any loss or damage suffered by a user in connection with, or arising from, any reliance placed on the information provided in this *Privacy and Security Policy*.