



OPTIMUM[®]
FINANCIAL SERVICES GROUP

PRIVACY & SECURITY NOTIFICATION

Protection of Personal Information Act (POPIA)

We care about your personal data.

We know privacy is very important and would like to explain how we collect and handle your personal information. This policy applies if you engage with Optimum as a business.

HOW DO WE COLLECT PERSONAL DATA?

We collect personal information directly from you and process your personal information:

- when you purchase a financial product;
- to provide you with service on your existing financial portfolio;
- when you submit enquiries to us; or
- when you contact us.

The type of personal information we collect will generally depend on the type of financial products you have with us and what the respective product supplier requests from us.

Personal information includes things like your name, email, address, occupation and details of other communications we have had with you.

If you interact with us and you choose to provide personal information that is considered "special personal information" under the Protection of Personal Information Act, this is entirely up to you. This could include things like racial or ethnic origin, or religious and political views. If a third party shares this type of info with us, we will notify you, and in return you must confirm if you are comfortable with this or if you want us to remove the special personal information from our records.

For potential employees, the type of information we've collected might be more detailed. This could include the examples above, as well as things like your CV, bank details, and emergency contacts. We will only ever keep this info if it will help us work with you as a potential employee.

If you've visited our website, we might collect info that you've shared with us directly and indirectly. Direct information could include the details you've chosen to share with us when making a contact enquiry or submitting a job application. Indirect information might be data we capture from cookies, which allows us to see when people can't find the info they need from our website. Rest assured, this type of information is always anonymous and doesn't identify you personally. Some information may be collected automatically whenever you visit our website. This is largely used for analytic purposes to better understand how visitors are using the website, but may include your IP address, browser and/or operating system information, the date and time you visited the website, the amount of time you spent browsing the site, your geographic location (if you have enabled this functionality on your browser), the pages you view while using the website, and any search terms you enter into the website's search bar. This information is aggregated and therefore individual personal information, behaviour or patterns cannot be identified.

Where possible, we will inform you if the information is required or optional. With your consent, we may also supplement the personal information you provide, with information we receive from other companies under the Optimum Umbrella, to offer you a more consistent and personalised experience in your interactions with us.

If, for example, you're a potential employee and someone referred your CV to us –we will always let you know why we have the information, and what we'll be using it for.



WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

In order for Optimum to meet our obligations to you we need to collect personal or other information: to fulfil your contractual needs for product offering(s) you have taken through us with our service providers; to follow your instructions; to contact you in the event you have logged a query or complaint via our website; to inform you of new services and to ensure that our business is geared towards your needs.

We will only use the information collected from you for the intended purpose.

The purpose may include one of the following:

- to provide financial products or services to you
- to contact you about your enquiry
- to send you relevant newsletter and market news updates (You can opt-out at any time)
- to effectively carry out requested instruction and to maintain our relationship
- for risk underwriting purposes
- to assess and process claims
- to do any servicing change on an existing contract
- 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
- to conduct market or customer satisfaction research or for statistical analysis
- for audit and record-keeping purposes
- in connection with legal proceedings
- governance and regulatory requirements
- monitoring access and usage of personal information
- investigating and reacting to security incidents

We may disclose your personal information to any company within the Optimum Financial Services group and to our service providers who are involved in the delivery of products or services to you. This may include service providers and/or third parties located outside the Republic of South Africa ("RSA") to cater for information that may be transferred offshore and/or information that is stored in a cloud, where the cloud servers are located outside RSA.

We may also disclose your information where we have a legal obligation or duty to do so, or where it is necessary to protect our legal rights.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that the personal information we remain responsible for is kept secure.

We will not use your information for any other purposes without your consent.

HOW IS INFORMATION STORED?

Whether it is stored in a physical or digital format, we are legally obliged towards making sure your information is secure and safe. We will, on a continuing basis, review our security controls and related processes to ensure that your personal information is secure.

This includes things like applying password protection, using secure server and document management systems and ensuring any inactive data is archived.

In the unlikely event of a security breach, we will do everything we can to comply with digital and legal best practice when managing and mitigating unauthorised access.

Our security policies and procedures includes:

- physical security
- computer and network security



- access to personal information
- secure communications
- retention and disposal of information
- acceptable usage of personal information

YOU ARE IN CONTROL.

Under South African privacy laws, you have the right to request that we provide you with access to the personal information we hold about you. If necessary, you can also request an update, correction or deletion of any of this information.

Get in touch with us if you would like to make a request about any of the above. We have a dedicated contact for all privacy related questions. You can email us using privacy@optimumgroup.co.za. We will take all reasonable steps to confirm your identity before making changes to personal information we hold about you.

If there is any reason why we can't update your personal information, we will let you know and explain why.

CHANGES

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes at www.optimumgroup.co.za

DATA BREACHES

In the event that OPTIMUM becomes aware that your personal information has been compromised in any way, we will notify you and the relevant Regulatory Authorities within the prescribed timelines, so that you are aware of the nature of the breach and what actions you may need to take in order to protect yourself.

LET'S TALK. - Have more questions?

Get in touch with our team. We'd love to hear your feedback, questions or concerns on privacy and how we engage with you.

We hope to discuss any concerns or complaints you have with our policy personally, but if you're not satisfied with our response you can get in touch with the Office of the South African Information Regulator.