

## PROTECTION OF PERSONAL INFORMATION POLICY

### PERSONAL INFORMATION

Personal information is collected only when an individual knowingly and voluntarily submits information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to this service.

It is BCM Management Company (Pty) Ltd.'s intention that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

BCM Management Company (Pty) Ltd collects, stores and use the personal information provide by an individual, in order to provide an estimated insurance quotation, credit risk advisory quotation and debt recovery quotation.

### USE OF INFORMATION

BCM Management Company (Pty) Ltd needs to collect personal or other information:

- For underwriting purposes
- Assessing and processing claims
- Conducting credit reference searches or verification
- Confirming and verifying an individual's identity
- For credit assessment and credit management
- For purposes of claims history
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- Conducting market or customer satisfaction research
- For audit and record keeping purposes
- In connection with legal proceedings
- Follow an individual's instructions
- Inform an individual of services
- Make sure that BCM Management Company (Pty) Ltd.'s business suits the individual's needs
- For debt collection
- For debtor monitoring

Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only.

BCM Management Company (Pty) Ltd will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever.

### SECURITY

BCM Management Company (Pty) Ltd strives to ensure the security, integrity and privacy of personal information submitted. BCM Management Company (Pty) Ltd will review and



update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, BCM Management Company (Pty) Ltd will endeavour to take all reasonable steps to protect the personal information, which an individual submits to BCM Management Company (Pty) Ltd or to BCM Management Company (Pty) Ltd.'s online products and services. BCM Management Company (Pty) Ltd will at all times set the highest standards to ensure the integrity of their systems.

BCM Management Company (Pty) Ltd may engage with other organisations to provide support services to BCM Management Company (Pty) Ltd. Third Parties are obliged to respect the confidentiality of any personal information held by the FSP. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

BCM Management Company (Pty) Ltd.'s employees are obliged to respect the confidentiality of any personal information held by BCM Management Company (Pty) Ltd. All employees are required to sign an employment contract which includes a confidentiality clause.

BCM Management Company (Pty) Ltd will not reveal any personal information to anyone unless:

- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law
- It is in the public interest
- BCM Management Company (Pty) Ltd needs to do so to protect their rights

BCM Management Company (Pty) Ltd endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact BCM Management Company (Pty) Ltd to have the information corrected.

BCM Management Company (Pty) Ltd recognises the importance of protecting the privacy of information collected about individuals, in particular information that is capable of identifying an individual ("personal information").

## CONDITIONS FOR THE LAWFUL PROCESSING OF PERSONAL INFORMATION

According to the POPI Act there are eight conditions that must be complied with to ensure that the processing of personal information is lawful. These conditions include:

### 1. Accountability

The responsible party must ensure that the conditions set out in Chapter 3 of the POPIA and all the measures that give effect to such conditions, are complied with at the time of determining the purpose and the means of the processing.

### 2. Processing Limitation

Personal information may only be processed in a lawful and reasonable manner that does not infringe on the privacy of the data subject.

Personal information may only be processed if:



BCM is an Authorised Financial Services Provider - FSP 2568 | Council for Debt Collectors Council No. 0015251/06  
Group Entities: BCM Management Company (Pty) Ltd | Ciras (Pty) Ltd | BCM Inland (Pty) Ltd | BCM KZN (Pty) Ltd  
BCM Coastal (Pty) Ltd | BCM Capital Protection (Pty) Ltd | BCM Capital Recoveries (Pty) Ltd  
Branches: JHB (Head Office): +27 11 234 0055 | Cape Town: +27 21 910 0625 | Durban: +27 31 702 0402  
PE: +27 41 373 0250 | East London: +27 43 736 1440 | Nelspruit: +27 63 806 5184 | Polokwane: +27 60 315 2776  
Group Directors: RD Evelyn; JF Rutherford; C Johnson | Regional Directors: WRN Ferreira; CA Oldacre; AG Munnik

- the data subject or a competent person, where the data subject is a child, consents to the processing;
- processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- processing complies with an obligation imposed by law on the responsible party;
- processing protects a legitimate interest of the data subject;
- processing is necessary for the proper performance of a public law duty by a public body; or
- processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.
- The FSP will also ensure that any personal information that is processed by it was obtained directly from the data subject.

### 3. Purpose Specific

BCM Management Company (Pty) Ltd will process personal information only for specific, explicitly defined, and legitimate reasons. BCM Management Company (Pty) Ltd will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.

### 4. Further Processing Limitation

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Therefore, if BCM Management Company (Pty) Ltd wishes to process existing personal information for a purpose other than the purpose for which it was originally collected, BCM Management Company (Pty) Ltd will first obtain additional consent from the data subject.

### 5. Information Quality

BCM Management Company (Pty) Ltd will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.

Where personal information is collected or received from third parties, BCM Management Company (Pty) Ltd will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or by way of independent sources.

### 6. Openness

BCM Management Company (Pty) Ltd will take reasonable steps to inform all data subjects whose information is being collected of:

- The information being collected and where the information is not collected from the data subject, the source from which it is collected;
- The name and address of the responsible party;
- The purpose for which the information is being collected;
- Whether or not the supply of the information by that data subject is voluntary or mandatory;
- The consequences of failure to provide the information;
- Any particular law authorising or requiring the collection of the information;
- The fact that, where applicable, the responsible party intends to transfer the information to a third country or international organisation and the level of protection afforded to the information by that third country or international organisation.



## 7. Security Safeguards

The responsible party must secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information.

To achieve the abovementioned results, the responsible party must take reasonable measures to:

- identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- establish and maintain appropriate safeguards against the risks identified;
- regularly verify that the safeguards are effectively implemented; and
- ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

## 8. Data Subject Participation

A data subject may request whether their personal information is held, as well as the correction or deletion of his or her personal information held by BCM Management Company (Pty) Ltd. BCM Management Company (Pty) Ltd will take all reasonable steps to confirm your identity before providing details of your personal information.

### CONTACT INFORMATION

Any questions relating to BCM Management Company (Pty) Ltd.'s POPI policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: Celeste De Vries

Telephone number: 074 749 3000

Fax number: N/A

Postal address: First Floor, 4 Simpson Place, Pinetown, 3610

Physical address: 55 Old Main Road, Kloof, 3610

Email address: [celeste@bcmza.co.za](mailto:celeste@bcmza.co.za)

Website: [www.bcmza.co.za](http://www.bcmza.co.za)

### POPI COMPLAINTS

Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon.

All complaints must be submitted to BCM Management Company (Pty) Ltd in writing and will be considered by the Information Officer.

Where the data subject is not satisfied with the Information Officer's determination, the data subject has the right to complain to the Information Regulator.

### Information Regulator

Tel: 012 406 4818 or +27 (0) 10 023 5207

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)



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