

# PROTECTION OF PERSONAL INFORMATION POLICY

APBCO Group of Companies



## The Companies in the Apbco Group

APBCO Centurion (Pty) Ltd - FSP 13786

APBCO Lynnwood (Pty) Ltd – FSP 45843

APBCO Kaap (Pty) Ltd - FSP 13776

APBCO Cynel (Pty) Ltd – FSP 46856

APBCO Durban (Pty) Ltd – FSP 13781

## **Objective**

The objective of this policy is to protect the information assets of APBCO and its associated companies against threats, be it internal or external, whether with intent or accidental. This is necessary to ensure business continuation, curbing of losses and maximising of business opportunities.

This policy sets the standard for suitable protection of personal information in APBCO. It provides the principles regarding the right for individuals to privacy and reasonable protection of personal information.

## **Scope**

The policy is applicable to the APBCO Group of Associated FSP's, their sole owners, key persons, representatives and other personnel in the APBCO Group. The sole owners, key personnel and management of the APBCO Group are eventually responsible for proper control of information security.

## **APBCO group's Information Control Officer**

**The responsibilities of the APBCO Group Information Officer (Louis Fivaz) are as follows :**

- The development and updating of this policy.
- Ensuring that this policy is supported with applicable documentation and procedural instructions.
- Assuring that documentation is relevant and kept up to date.
- Communicating the content of the policy, and consequential updating, to the relevant managers, representatives, personnel and associates concerned.

The sole owners, key personnel, representatives and personnel of the APBCO Group are obliged to comply with the provisions of this policy. Any deviations from this policy or breach thereof or incidents that may relate to such a possibility, must be reported to the Information Officer.

External individuals, involved in information technology under contract to the APBCO Group, will be subjected to the same information security policy as applicable to the APBCO Group. A separate contract will have to be signed confirming commitment to the policy and will include assurance that security measures are in place when personal information is processed.

## **Core Principles**

The sole owners, key personnel, representatives as well as personnel of the APBCO Group are committed to the following principles:

- APBCO will always maintain and develop reasonable protective measures against risks such as loss, unauthorised access, destruction, use, alteration or revelation of personal information.
- APBCO will at all times comply with restrictions and other requirements applicable to the international transfer of information.

- APBCO upholds the requirements of the legislation on BPVI and maintains an approach of transparency of operational procedures that control collection and processing of personal information.
- APBCO is committed to comply with all applicable regulatory requirements related to the collection and processing of personal information.
- APBCO undertakes to collect personal information in a legal and reasonable way and to process the personal information obtained from clients only for the purpose for which it was obtained in the first place.
- Processing of personal information obtained from clients will not be undertaken in an insensitive or wrongful way that can intrude on the privacy of the client.
- APBCO undertakes not to request or process information related to race, religion, medical situation, political preference, trade union membership, sexual certitude or criminal record. APBCO will also not process information of juveniles.
- APBCO will ensure that correct and sufficient information is on record of its clients. Non-relevant information will be removed. Only the latest information related to the insurance policy will be recorded.
- Information will be directly obtained from the client.
- APBCO also undertakes not to provide any documentation to a third party or service provider without the consent of the client except where it is necessary for the proper execution of the service as expected by the client, in compliance with the insurance coverage, with the proviso that APBCO will at all times ensure that the third party also complies with the stipulations and requirements of the BPVI legislation as well as when documents are requested by institutions as prescribed by law.
- APBCO is compelled to keep effective record of personal information and undertakes not to keep information for a period longer than that prescribed by the FAIS legislation. Information will be destroyed at the end of the prescribed period in such a way that it cannot be reconstructed.
- APBCO will provide the necessary security of data and keep it in accordance with prescribed legislation.
- Should information be lost, that is not under the control of APBCO anymore, it will immediately be brought to the attention of the client and the regulator.
- In the event of data loss, the client will receive sufficient information to restrict possible risk that may result from the loss.
- Clients may at all times inquire about information kept and may also request the removal or destruction of information which is not relevant anymore.
- APBCO will ensure that all service providers and other role players involved, comply with the expectations of the BVPI legislation of 2013.
- The management of APBCO give the assurance that representatives and staff understand the requirements and expectations of the act and comply with the content thereof and that training will take place on an ongoing basis.
- APBCO's policy regarding private information will continuously be updated to comply with legislation, thereby ensuring that personal information will be secure.

### **Monitoring**

The management as well as the information officer of the APBCO Group, are responsible for the implementation, administration and supervision of this policy. This function includes the provision of supporting guidelines, standardised operational procedures, notices, applicable documents and processes.

The sole owner, key personnel, representatives and staff of the APBCO group will be trained to be conversant with their functions regarding the regulatory requirements, policy and guidelines related to the protection and control of personal information. The FSP's of the APBCO group will undertake periodic revision and auditing to ensure compliance with the policy, guidelines and the application of the principle of privacy of information.

### **Operational controls**

The APBCO Group will implement suitable operational controls to ensure privacy of information in compliance with this policy and the regulatory requirements. These control measures will comprise of:

- Allocation of responsibilities for information security.
- Incident reporting and management.
- User ID inclusion or removal.
- Information security training and education.
- Data backup.

### **Implementation**

This policy is implemented by the FSP's of the Apbco group. All stakeholders namely shareholders, directors, key personnel, representatives and staff of the Apbco group as well as the FSP's assigned with the duty to collect and process personal information, must comply with the requirements of the policy.

Non-compliance to this policy will lead to disciplinary action such as a possible change of mandate or dismissal.