



Privacy statement to clients and members

Version	1
Effective Date	01/07/2021
Last Review Date	06/07/2021
Frequency of Review	Annually

Set out below are details about **SALT Employee Benefits (SALT EB)**. This Policy applies to the collection, use, disclosure and protection of personal information relating to clients of SALT EB, all vendors and suppliers of SALT EB, and all users of the SALT EB Website and Online Portals.

1. Basic principles

- 1.1. At SALT EB we respect and take your privacy seriously, and as such we will use and process the personal information that we collect from you in accordance with this Policy.
- 1.2. We collect and process your personal information for lawful purposes which are related to the product/s you are invested in, and functions and business activities of SALT EB, where such purpose/s are compatible with and necessary in order for us to pursue and maintain the legitimate interests of SALT EB and yourself.
- 1.3. We undertake to collect and process your personal information in a reasonable manner, and in such a way that the processing is adequate, relevant and not excessive. We also undertake to take reasonable steps to ensure that the personal information that you provide to us remains accurate in line with the Protection of Personal Information Act, 2013 (“POPIA”) and any other applicable legislation.

2. What we mean by personal information

- 2.1. When we refer to personal information (or personal data) in this Policy, we mean information that can identify you or is capable of identifying you. By personal information we do not mean general, statistical, aggregated or anonymous information or other derivative data that does not, alone or with other data, identify a specific individual or juristic entity.
- 2.2. We collect personal information from you when you or your appointed agent provide such information to SALT EB via email or submit physical copies, for example, when you register on the Website, contact us with enquiries or use the products and/or services provided by SALT EB.
- 2.3. Generally SALT EB only collects and processes personal information which you provide to us. Details of the categories of personal information collected and processed are available in our PAIA Manual available on our website <https://www.salteb.co.za>.

3. Consent

If you choose to provide us with personal information, you are consenting voluntarily and on an informed basis to SALT EB's processing of your personal information which includes collection, use, storage and transfer of that personal information where applicable.

4. The type of information we collect about you

4.1. SALT EB collects and stores amongst others the following personal information:

4.1.1. Name, ID number, email address, phone numbers, physical contact information, voice biometrics, banking details, unique identifiers and (depending on the service used) sometimes financial information, this information is mainly collected to service you and to comply with the Financial Intelligence Centre Act ("FICA") and other applicable legislation.

4.1.2. Computer sign-on data, statistics on page views, traffic to and from the Website and ad data (all through cookies - you can take steps to disable the cookies on your browser although this is likely to affect your ability to use the Website); and

4.1.3. Other information, including users IP address and standard web login information.

5. How we collect information about you

5.1. In general, you or your appointed agent may provide personal information to us when communicating with us. We may in certain circumstances collect your information from a regulator, authority or other third party, but only where reasonable to do so and when we are unable to collect the information from you directly, to comply with a legal obligation or to protect your legitimate interest.

5.2. When you register with SALT EB on the Website, you will be asked to provide certain personal information, including your name, address and contact details. SALT EB uses the information that you provide to us during registration to enhance your experience, and to try and make your experience with us more productive and efficient.

5.3. You may request a product or a service and provide your name, email address, physical/postal address, telephone number, and banking details so that the instruction can be processed.

- 5.4. When you call us, we may monitor or record your calls and details of the phone number(s) you use to make the calls. This information is used to better address your client service needs and is in most circumstances a requirement in law.
- 5.5. We will collect information concerning your likes and preferences both when you tell us what these are and through our analysis of Website traffic, including through the use of cookies.
- 5.6. You may need to provide us with your banking details in order to make payments to us and for us to make payment to you. Any such information will be used by us only for the specific purpose for which it was provided to us.
- 5.7. We will always endeavour to secure the integrity and confidentiality of your personal information which is in our possession or under our control.

6. How we use your information

- 6.1. We may use your information to confirm that you have received the products or services which you registered for or have requested from SALT EB; to validate you as a client when using our services; to prevent and detect criminal activity, fraud and misuse of or damage to our services or networks; to prosecute those responsible; or to contact you to invite you to form part of our consumer panel or research groups.
- 6.2. We may use your information as is appropriate in the normal course of business to provide the products and services you have requested.
- 6.3. We may also use your personal information and process such information for the purposes of management, research, analysis, corporate reporting, statistics and improving business efficiencies.
- 6.4. We may use personal information collected about you to contact you by post, telephone and electronic means (e.g. email, Facebook, and SMS) about functionality changes to the Website, Online Account services or changes to our product terms and conditions and to communicate with you about your client benefits, SALT EB related information, complaints you have raised or to advise you regarding the use of our products and services.
- 6.5. Excluding communications required by law, such as account statements, you may opt-out of certain communications, and SALT EB will provide you with the opportunity to opt-out.

6.6. We will always endeavour to ensure that your personal information is protected, and access to such information is limited at all times to appropriate parties.

7. How long do we keep your information for?

7.1. The time periods for which we keep your personal information may vary according to the use or purpose attached to the information. Unless there is a specific legal or compliance and business requirement mandating us to keep your information, we will not keep it for longer than necessary for the purpose for which the information was collected or for which it is to be processed.

7.2. Where there is no lawful purpose or obligation to retain your personal information, you may further request the deletion/deidentification of your personal information.

8. Disclosing your information to third parties

8.1. SALT EB does not sell or rent your personal information to third parties for their marketing purposes without your explicit voluntary and informed consent.

8.2. We reserve the right to access and disclose individual-identifying information to third parties to comply with applicable laws, regulations and lawful government requests, to operate SALT EB's systems properly or to protect SALT EB or its users or to solve any client disputes.

8.3. We may provide aggregate statistics about our products, sales, customers, traffic patterns and other website information to third parties, but these statistics will not include any information that could personally identify you.

8.4. We may share your personal information with our employees, agents, subcontractors, with our related entities, with your adviser and/or their duly appointed agent or service provider in the normal course of business to provide the products and services you have requested. We may from time to time elect to make use of other organisations to provide some of our services. We may then share your personal information with these organisations. These organisations can and will process this personal information, and will be obliged to keep such information confidential and to carry out the processing in a reasonable manner that does not infringe your privacy.

9. Cross-border transfer of your information

- 9.1. SALT EB maintains collaborative relationships with various domestic and international vendors, subcontractors, strategic partners, and others who assist SALT EB and our clients in the conduct of our respective businesses. From time to time, SALT EB may transfer personal information to these parties to enable them to work with SALT EB, but SALT EB requires that they maintain the privacy of personal information in a manner satisfactory to SALT EB and consistent with applicable law.
- 9.2. SALT EB will ensure that whenever personal information is transferred to foreign countries, it will remain adequately protected.
- 9.3. It is SALT EB's policy not to transfer personal information to any entity, individual, or organisation located in countries that do not provide an adequate level of data protection, unless one or more of the below requirements are met:
 - 9.3.1. You have given your consent;
 - 9.3.2. The transfers are needed to enter into or perform a contract with you;
 - 9.3.3. The transfers are needed for the conclusion or performance of a contract concluded in your interest;
 - 9.3.4. The transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
 - 9.3.5. The transfers are permitted under applicable law.
- 9.4. Personal information transferred to another country may be subject to all the laws of that country, including laws related to money laundering, corruption and bribery, national security and anti-terrorism, which may permit local law enforcement or regulatory agencies to obtain access to information held by private businesses.

10. Security

- 10.1. SALT EB uses different technology, tools and procedures (for example, encryption, firewalls, passwords, physical security) to reasonably protect your personal information against unauthorised access and disclosure, however, SALT EB makes no representations or warranties whatsoever in this regard.

11. Access, modification and deletion of your information

- 11.1. You have the right at any time to request that we confirm the personal information which we hold about you, and to request that we correct any incorrect or inaccurate personal information which we hold about you.
- 11.2. In addition, you can see, modify or erase most of your personal information by contacting us to review any personal information that SALT EB holds about you. SALT EB deletes personal information when SALT EB no longer needs it for the purposes that are described earlier. For more information please see our PAIA manual on our Website <https://www.salteb.co.za>
- 11.3. Where the law creates an obligation on us to retain your information for a prescribed period, we may not process your request to delete your information.

12. Data breaches

- 12.1. In the event that SALT EB becomes aware that your personal information has been compromised, we will notify you and the relevant Regulatory Authorities as soon as is reasonably possible once the breach has been confirmed, so that you are aware of the nature of the breach and what actions you may need to take in order to protect yourself.

13. General

- 13.1. This Policy shall be governed in all respects by the laws of the Republic of South Africa.
- 13.2. At times it may be necessary for SALT EB to make changes to this Policy. SALT EB reserves the right to update or modify this Policy at any time, and from time to time, without prior notice to you. Please review this Policy periodically, and especially before you provide any personal information to SALT EB. This Policy was last updated on the date indicated above. Your continued use of the SALT EB's products and services after any changes or revisions to this Policy shall indicate your agreement with the terms of such revised Policy.

14. Complaints

Any complaints relating to the processing of your personal information must be sent to our Information Officer at popia@salteb.co.za

However if your complaint is not dealt with to your satisfaction you may direct it to the Information Regulator:

The Information Regulator Contact Details:

Tel: 012 406 4818

Fax: 086 500 3351

Email: infoleg@justice.gov.za

Website: <https://justice.gov.za/infoleg/>