

WEBSITE PRIVACY NOTICE

This Website Privacy Notice applies to Personal Information, in terms of the Protection of Personal Information Act 4 of 2013, that Jay Ramsunder CC ("the FSP") collects through this website: www.jayramsonder.co.za

Purpose

The purpose of the Protection of Personal Information Act 4 of 2013 (POPI) is to give effect to the constitutional right to privacy. This is achieved by safeguarding Personal Information when processed by a Responsible Party, subject to justifiable limitations that are aimed at balancing the right to privacy against other rights, particularly the right of access to information; and protecting important interests, including the free flow of information within the Republic of South Africa and across international borders.

Personal information means information which alone or jointly with other factors identifies you as a person (ie. known as the Data Subject). This includes information such as your name, contact details, telephone number, biometric information, registration number and any other information we collect.

The Act regulates the manner in which Personal Information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of Personal Information. Furthermore, it provides persons with rights and remedies to protect their Personal Information from processing that is not in accordance with the Act.

All Responsible Parties, such as the FSP, are required to develop and implement a Website Privacy Policy that informs existing and prospective clients/customers how they process Personal Information through various activities which could include collecting, receiving, recording, storing, updating, using, transferring or erasing Personal Information.

We are committed to protecting existing and prospective client's/customer's privacy and will ensure that their Personal Information is used appropriately, transparently, and according to applicable law.

We undertake to treat all Personal Information as private and confidential. The purpose of this Website Privacy Notice is to explain how and why we use your Personal Information.

Definitions

Consent means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information.

Cookies means A small text file (up to 4KB) created by a website that is stored in the user's computer either temporarily for that session only or permanently on the hard disk (persistent cookie). Cookies provide a way for the website to recognize you and keep track of your preferences.

Data means information in electronic form.

Data Subject means the person to whom Personal Information relates.

Electronic Communication means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient.

Information Officer means the head of the private body as contemplated in Section 1 of the Promotion of Access to Information Act 2000 (PAIA) and who has been registered with the Information Regulator in such capacity.

IP address means a unique address that identifies a device on the Internet or a local network.

Person means a natural or juristic person.

Personal information shall mean, for purposes of this Website Privacy Notice and as defined under the Act, information about an identifiable, natural person, and in so far as it is applicable, an identifiable, juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national,
- ethnic or social origin, colour, sexual orientation, age, physical or mental health,
- well-being, disability, religion, conscience, belief, culture, language, and birth of the person.
- information relating to the education or the medical, criminal or employment history of the person or information relating to financial transactions in which the person has been involved.
- any identifying number, symbol or other particulars assigned to the person.
- the address, fingerprints, or blood type of the person.
- the personal opinions, views, or preferences of the person, except where they are about another individual or about a proposal for a grant, an award of a prize to be made to another individual.
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- the views or opinions of another individual about the person.
- the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the person, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and
- the name of the person where it appears with other Personal Information relating to the person or where the disclosure of the name itself would reveal information about the person.
- but excludes information about a natural person who has been dead, or a juristic person that has ceased to exist, for more than 20 years.

POPI means the Protection of Personal Information Act 4 of 2013.

Processing means any operation or activity or any set of operations, whether by automatic means, concerning Personal Information, including:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use.
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

Record means any recorded information-

- regardless of form or medium, including any of the following:
 - Writing on any material.
 - Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored.

- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph or drawing.
- Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.
- in the possession or under the control of a responsible party.
- whether or not it was created by a responsible party; and
- regardless of when it came into existence.

Responsible Party means, for purposes of this Website Privacy Notice, all persons to whom this Website Privacy Notice applies, whom, whether alone or in conjunction with others determines the purpose and means of processing Personal Information.

Special Personal Information means information relating to a person's (a) religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject; or (b) criminal behavior, as defined under the Act.

Traffic Data means any data processed for the purpose of the conveyance of a communication on an electronic communications network in respect of that communication and includes data relating to the routing, duration or time of a communication.

User means a person who uses a computer or other device to access this website; and

Web Browser means an application used to access and view this website. Well know web browsers include Internet Explorer, Google Chrome and Safari.

Lawful Conditions for Processing of Personal Information

The FSP is responsible for the lawful processing of Personal Information in accordance with the conditions described under chapter 3 of the Act, which include:

- Accountability.
- Processing Limitation.
- Purpose Specification.
- Further processing limitation (information should only be processed for the reason it was originally collected);
- Information Quality.
- Openness.
- Security Safeguards; and
- Data Subject Participation.

We are only able to collect as much information as is necessary to fulfil the intended purpose for which the information is collected. However, we can collect more information, for a further intended purpose, if we obtain the necessary consent from you.

OUR BUSINESS

In terms of the POPI Act, 2013 the FSP is regarded as a Responsible Party.

We provide Financial Services, Short- and Long-term Insurances, Medical, Investment planning. Our aim is to provide holistic financial planning and risk management to our clients.

INFORMATION THAT WE COLLECT

We collect and process your Personal Information mainly to provide you with the services and products which we offer. The type of information we collect will depend on the need for which it is collected and will be processed for that specific purpose only. Where possible, we will inform you what information you are required to provide to us and what information is optional.

In order for us to offer and conclude any transactions, it is mandatory for you to supply us with certain basic information such as your personal information mainly to provide you with access to the services and products of the providers with whom we have contractual agreements in place and to help us improve our services to you. The type of information we collect will depend on the need for which it is collected and will be processed for that specific purpose only. Where possible, we will inform you what information you are required to provide to us and what information is optional. In order for us to offer and conclude any insurance related transactions, it is mandatory for you to supply us with certain basic information.

The consequences of failure to provide such information will result in us being unable to conduct a needs analysis, render appropriate advice, generate quotes/proposals or to commence/conclude the requested transaction.

Your basic information is required in terms of the legislation applicable to the financial product requested and our FSP licence obligations. With your consent, we may also supplement the information that you provide to us with information we receive from other providers in order to offer you a more consistent and personalized experience in your interactions with us. When you elect to take up offerings from our contracted providers, they may also require additional information from you and they will be subject to the same privacy regulations as we are subject to.

With your consent, we may also supplement the information that you provide to us with information we receive from other parties.

HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected and agreed to with you. This may include: - Providing products or services to you and to carry out the transaction you requested; For underwriting purposes; Assessing and processing claims; Conducting credit reference searches or verification; Confirming and verifying your identity; Credit assessment and credit management; Determine claims history; Detection and prevention of fraud, crime, money laundering or other malpractice; Conduct market/customer satisfaction research; For audit and record keeping purposes; In connection with legal proceedings; Providing our services to you, to carry out the services you requested and to maintain and constantly improve our relationship with you; Providing you with communications in respect of our business and regulatory matters that may affect you; In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

The nature of the contractual relationship between the FSP and you may result in further processing of your Personal Information. Further processing will be compatible with the purpose for which it was collected.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to our providers whose services or products you elect to use. We have agreements in place to ensure that they comply with our privacy terms and conditions. We may also share your personal information with and obtain information about you from: - Third parties for the purposes listed above; Other companies in the industry when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing; Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

We have agreements in place to ensure that they comply with our privacy terms and conditions. We may also share your Personal Information with and obtain information about you from: - Third parties for the purposes listed above; Other companies in the industry when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing. We may also disclose your information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect your or our legitimate interests and rights.

SAFEGUARDING YOUR INFORMATION

We are required to adequately protect the Personal Information and to avoid unauthorised access and usage. We will continuously review our security controls and processes to ensure that your Personal Information is secure. Our security policies and procedures cover: - Physical security; Computer and network security; Access to Personal Information; Secure communications; Security in contracting out activities or functions; Retention and disposal of information; Acceptable usage of Personal Information; Governance and regulatory issues; Monitoring access and usage of private information; Investigating and reacting to security incidents. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone, to whom we pass your Personal Information, including a third country or international organization, agrees to treat your information with the same level of protection and privacy regulations as we are subject to.

YOUR RIGHTS

You have the right to: access the Personal Information we hold about you; ask us to update, rectify or delete your Personal Information; object to the processing of your Personal Information; lodge a complaint with the Information Regulator on complaints.IR@justice.gov.za or visit the website on www.justice.gov.za or at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

We will take all reasonable steps to confirm your identity before providing details of your Personal Information or making changes to your Personal Information. Any such access request may be subject to a payment of a legally allowable fee. Please view our PAIA and POPI Manual for more information on how to access information which we hold..

To request information, our contact details are:

Information Officer

Rahul S Ramsunder

Tel: 082 6686631

E-mail: rahul@jayramsunder.co.za

Responsible Party

Jay Ramsunder

Tel: 082 4511837

E-mail: jay@jayramsunder.co.za

Website: www.jayramsunder.co.za

ANONYMOUS COLLECTION OF DATA FROM USE OF OUR WEBSITE

We monitor user experience while you are using our website and collect anonymous connection statistics through our monitoring solution. This is to improve our website service and add value to you when you visit our website.

We do not collect Personal Information on this site unless you provide us with your Personal Information. If you provide Personal Information through this site, it will be held by our web administrator.

There are places on the website where you can provide Personal Information, such as:

- Emailing an enquiry to us
- Completing the "Contact Us" fields
- Registering for an event, where applicable
- Lodge a complaint, make a comment, or give feedback through the website, we will process your email address and other contact details, if provided.

WEBSITE ANALYTICS

You may visit the website without providing any Personal Information. The website servers will in such instances collect the IP address used by the Data Subject, to access the website, but not the e-mail address or any other personal identifiable information. The information on IP addresses is aggregated to measure the number of visits, the average time spent at the website, pages viewed, etc. We analyse non-identifiable traffic data to improve our services, via a third-party program, namely Google Analytics.

We may collect, hold, and use statistical information about website visits to help us improve the website. Such information includes:

- Your IP address.
- The search terms you used.
- The pages accessed on the FSP's website, and the links visitors clicked on
- The date and time you visited the website.
- The referring website (if any) through which you clicked through to the FSP's website; and
- The type of web browser you use (e.g., Internet Explorer, Mozilla, or Firefox).

The traffic data is aggregated and is not personally identifiable. Our website analysis will also respect any "do not track" setting you might have set on your web browser.

USE OF COOKIES ON OUR WEBSITE

We may use cookie technology on our website. A cookie is a small text file that is stored on a computer or internet enabled device, and it holds information such as the identity of the computer or device that was used to access the website, the server address, domain name, the time and date that the website was visited, pages, product and documentation that the individual accessed or viewed as well as the internet browser that was used.

We may use cookies so that it can provide a more personalised service, communication and products by better understanding its prospective and existing client base and their browsing behavior to improve their website. We have non-essential cookies that enable us to distinguish users, and strict transport security which allows a website to declare itself as a secure host.

We may make use of tracking cookies to track and analyse website usage. The cookies do not collect any Personal Information about Data Subjects.

Internet browsers generally accept cookies automatically, but this setting can be changed to stop accepting them – you can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent individuals from accessing certain aspects of the FSP's website where cookies are necessary. For more information about cookies go to www.allaboutcookies.org

LINKS TO OTHER WEBSITES ON OUR WEBSITE

Our website may have links to or from other websites that are not operated by us. We request that you read and familiarise yourself with the privacy and security policies of these websites as we are not responsible for the privacy and security of the websites mentioned.

LINKS TO SOCIAL NETWORKING SERVICES

We may use social networking services such as Instagram, Twitter and Facebook to communicate with the general public about our services. When you communicate with us through these services, that particular social networking service may collect your Personal Information for its own purposes.

These services may track your use of our website on the pages where their links are displayed. If you are logged into those services (including any Google service) while using our website, their tracking will be associated with your profile and those service providers.

These services have their own privacy policies which are independent of our Website Privacy Notice and our Website Disclaimer and Terms and Conditions.

USE AND MONITORING OF ELECTRONIC COMMUNICATIONS

We may use your Personal Information for the purposes of administering and improving the website, improving our services or communicating with you. The Personal Information you provide to us may be shared with Operators to the extent necessary for them to administer and improve the website on our behalf.

RETENTION OF PERSONAL INFORMATION

Our retention schedule and information policies define how long we keep all types of records, including any Personal Information we process in the different divisions. Personal Information is retained and destroyed as required or authorised by law, and for defined purposes related to the activities of the FSP.

CHANGES TO THIS NOTICE

We may change this Website Privacy Notice to align with changes in the law or changes in technology which impact on how we process your Personal Information. We will publish all changes which describes our new practices or procedures on our websites, and the latest version will replace previous versions. Please check our website periodically for changes.

This Website Privacy Notice was adopted by the Board of Directors / the Members on 15 August 2022.

Version	08-2022	Review	Annually
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