



POPI POLICY

In terms of The Protection of Personal Information Act (Act No. 4, 2013)

INTRODUCTION

BRAMICHE TRADING CC is an authorised financial service provider ("the FSP") which is obliged to comply with The Protection of Personal Information Act ('POPI'). POPI requires the FSP to inform their clients as to how their Personal Information is used, disclosed and destroyed.

The FSP guarantees its commitment to protecting their client's privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

This Policy sets out how the FSP deals with their client's Personal Information and in addition for what purpose said information is used for.

This Policy is made available on our company website [www. Bramich.co.za](http://www.Bramich.co.za) and on request from our office during business hours.

Section 9 of POPI states that *"Personal Information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive."*

THE PERSONAL INFORMATION COLLECTED

The FSP collects and processes clients Personal Information pertaining to clients Financial Needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only.

Whenever possible, we will inform the client what information they are required to provide us with and what information is optional.

Examples of the Personal Information we collect include but not limited to:

1. Clients Identity number, name, surname, address, postal code, marital status and how many dependents they have
2. Description of clients' residence, business and assets; and

3. Any other information required by us, suppliers and Insurers in order to provide clients with an accurate Analysis of their Insurance needs.

The FSP also collects and processes clients Personal Information for marketing purposes to ensure our products and services remain applicable to our clients and potential clients.

We have agreements in place with all our Product Suppliers, Insurers and third-party Service Providers to ensure there is a mutual understanding with regard to the protection of Client Personal Information. Our suppliers are subject to the same regulations as we are subjected to.

With client's consent, we may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalized experience in clients' interaction with us. For purposes of this Policy, clients include Potential and existing clients.

HOW PERSONAL INFORMATION IS USED

Client's Personal Information will only be used for the purpose for which it was collected and agreed.

This may include:

1. Providing products or services to clients and to carry out the transactions requested
2. For underwriting purposes
3. Assessing and Processing claims
4. Conducting credit reference searches or verification
5. Confirming, verifying and updating clients' details
6. For purposes of claims history
7. For the detection and prevention of fraud, crime, money laundering or other malpractice
8. Conducting market or customer satisfaction research
9. For audit and record keeping purposes
10. In connection with legal proceedings
11. Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship
12. Providing communications in respect of the FSP and regulatory matters that may affect clients
13. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to Section 10 of POPI, Personal Information may only be processed if certain conditions are met which are listed below along with supporting information for the FSP processing of Personal Information:

1. Client consents to the processing – consent is obtained from clients during the introductory, appointment and Needs Analysis stage of our relationship;
2. The processing is necessary – in order to conduct an accurate Analysis of clients Insurance needs certain Personal information is required;
3. Processing complies with an obligation imposed by law on the FSP – The Financial Advisory and Intermediary Services Act ('FAIS') requires Financial Service Provider's ('FSPs') to conduct a Needs Analysis and obtain information from clients about their Insurance Needs in order to provide them with applicable and beneficial products;

4. Processing protects a legitimate interest of the client – it is in the client's best interest to have a full and proper Needs Analysis performed in order to provide them with an applicable and beneficial product, this requires obtaining Personal Information;
5. Processing is necessary for pursuing the legitimate interests of the FSP or of a third party to whom information is supplied – in order to provide our clients with products both ourselves and our Product suppliers and insurers need certain Personal Information from the clients to make an expert decision on the unique and specific product they require.

DISCLOSURE OF PERSONAL INFORMATION

1. We may disclose clients' Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.
2. We may also share client Personal Information with, and obtain information about clients from third parties for the reasons already discussed above.
3. We may also disclose clients' 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.

SAFEGUARDING CLIENTS' INFORMATION

It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your Personal Information is secure.

The following procedures are in place in order to protect your Personal Information:

1. Our external Compliance Officer is hereby mandated to monitor the status of the safeguarding of clients Personal Information and the recommendations made by him will be actioned. This will take place as part of the quarterly compliance monitoring.

The Compliance Officer's details are as follows:

Name: ANDRE HEYDENRICH

Tel: 0824578987 | Fax:

E-mail: andre@complilegal.co.za

2. The FSP's INFORMATION OFFICER is **Bradley N Usher & Anastasia Sedith**. Our internal **Deputy Information Officer is: Alricia E Smuts** and they are responsible for the encouragement of compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI.
3. THIS POLICY has been put in place and training on this policy and the POPI Act will take place from the date of implementation and will be facilitated by HR and in conjunction with the Information Officer
4. Each employee will be required to sign a CONFIDENTIALITY AGREEMENT which will be considered an annexure to their Employment Contract

5. An INCIDENT MANAGEMENT REGISTER will be kept to log any security incidents and to report on and manage said incidents this register will be maintained by the Information Officer of the FSP in conjunction with the Key Individual
6. CONSENT to process client information is obtained from clients (or a person who has been given authorisation from the client to provide THE CLIENT'S Personal Information) during the Introductory, Appointment and Needs Analysis stage of the relationship.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

1. Clients have the right to access the Personal Information we hold about them.
2. Clients also have the right to ask us to update, correct or delete their Personal Information on reasonable grounds.
3. Once a client objects to the processing of their Personal Information, the FSP may no longer process said Personal Information.
4. We will take all reasonable steps to confirm our clients' identity before providing details of their Personal Information or making changes to their Personal Information.

INFORMATION OFFICER:

The details of our Information Officer and head office are as follows:

Name : Anastasia Sedith
Telephone number : 078 453 5349
Fax number :
E-mail address : asedith@bramich.co.za
Physical address : Unit 46, 99 Mimosa Street, Randpark Ridge, Randburg

The details of the FSP's Key Individual are as follows:

Name : Bradley N Usher
Telephone number : 083 395 7902
Fax number :
E-mail address : bushier@bramich.co.za
Physical address : 16 Noreen Street, Bordeaux, Randburg

Our internal deputy Information Officer


Name : Alricia E Smuts
Telephone number : 074 455 3765
Fax number :
E-mail address : asmuts@bramich.co.za
Physical address : 86 Park street, Jeppestown

AMENDMENTS TO THIS POLICY


Amendments to this Policy will take place on an ad hoc basis or at least once a year. Clients are advised to make the necessary inquiries to that effect or to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.

We acknowledge our responsibility to ensure that Bramiche remains compliant and that all the necessary training and compliance is adhered to in the business.


Signed at Randburg..... on this 01..... day of JUNE..... 2021.....


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Key Individual/Information Officer: BN USHER


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Information Officer: AN SEDITH


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Deputy Information Officer