



BRAWNE CAPITAL

## PRIVACY POLICY

Brawne Capital Holdings Limited and its subsidiaries ("Brawne") strongly believe in protecting your privacy and the confidentiality of your personal information. In order to explain how Brawne collects, uses and protects personal information, we have developed this privacy policy. Personal information is any combination of information, in the possession of, or likely to come into the possession of Brawne that can be used to identify, contact, or locate a discrete individual ("Personal Information") and will be treated in accordance with this privacy policy. This includes any expression of opinion about such individual. Any information which cannot be used to identify a discrete individual (such as aggregated statistical information) is not personal information.

### .THE PURPOSE OF COLLECTION

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

We also collect information about you from other sources as explained below.

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

Website usage information is collected using "cookies" which allows us to collect standard internet visitor usage information.

### HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship;
- For underwriting purposes;
- To assess and process claims;
- To conduct credit reference searches or verification;



- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For operational purposes, and where applicable, credit scoring and assessment and credit management;
- For purposes of claim checks
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- For debt tracing or debt recovery;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

## DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal information with, and obtain information about you from:

- Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies;
- Other insurers to prevent fraudulent claims;
- Other companies in the Brawne group 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 law or industry codes;
- Where we believe it is necessary to protect our rights.

## INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related 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 may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

## YOUR RIGHTS: ACCESS TO INFORMATION

You have the right to request a copy of the personal information we hold about you. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

## CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check this website periodically to inform yourself of any changes.

## HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following numbers/addresses:

	 BRAWNE PROTECT	 brough capital
<b>FSP name</b>	Brawne Protect (Pty) Ltd	Brough Capital (Pty) Ltd
<b>FSP number</b>	51198	884
<b>Responsible person</b>	Naresh Ashok	Christiaan Botha
<b>Full name of Key Individual</b>	Naresh Ashok	Christiaan Botha Naresh Ashok
<b>Compliance Officer</b>	Adv D Opperman	
<b>Information Officer</b>	Marc Potgieter	
<b>Physical Address</b>	10 Point Road, Mossel Bay Western Cape, 6510	18 Jacqueline Avenue Northcliff Randburg, 2115
<b>Telephone Number</b>	044 8744900	010 594 2100
<b>E-mail Address</b>	info@brawne.co.za	

## INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are:

Information Regulator

**Tel:** 010 023 5200

**Email:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

[POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)