



ALEXANDER FORBES GROUP

PRIVACY NOTICE

Alexander Forbes is committed to protecting your personal information and privacy. For more details on how we collect, store, use and protect your personal information, read our detailed privacy notice below.

To access and manage your personal information, please use one of the following channels:

- Log in to AF Online
- Contact our call centre
- Contact your consultant or broker
- Follow the procedure provided by the human resources department of your organisation

For any general queries on privacy, contact our Privacy Office at zzprivacy@forbes.com.



PRIVACY NOTICE

At Alexander Forbes, we believe that your privacy rights are important. We strive to always treat your personal information securely and confidentially in compliance with all required data protection legislation.

This privacy notice applies to:

- Alexander Forbes Group Holdings (Pty) Ltd (registration number 2006/025226/06) and all its direct or indirect subsidiaries and affiliates
- all our websites, mobile applications and other digital channels, unless otherwise specified

This privacy notice describes how we collect, store, use and protect information that can be associated with you or used to identify you (in other words, personal information).

What are your privacy rights and options?

At Alexander Forbes, we respect your rights to access your personal information, correct it, restrict its processing and delete it. We do our best to make sure that you can freely exercise these rights.

You may request to access, update, correct and delete personal information

You have the right to request access to any personal information held by Alexander Forbes. You may also request that we update or correct your personal information to make sure it is accurate and complete, and in certain circumstances you can request that we delete your information.

In general, we try to make this easy for you through our website or digital channels. You can also contact our call centre, your consultant or broker, or follow the procedures provided by the human resources department through your employer.

For any other types of requests, or to request personal information belonging to someone else, please follow the procedures described in our **PAIA Manual**.

There may be some instances where we cannot grant your request – for instance if you ask us to delete data which we are legally obligated to keep in order to comply with a law. We may also decline requests where these would prejudice any legal purposes (for example, anti-money laundering, fraud or investigation). Other reasons that we might deny a personal information request are if it jeopardises the privacy of others, is trivial or nuisance, or would be extremely impractical.

What personal information do we collect?

At Alexander Forbes, we try to collect only the personal information that we need to provide you with products and services.

We collect and process personal information about the following data subjects:



You are not required to provide us with any of your personal information, but in most cases that means that we will not be able to provide you with our products and services, or attend to your requests.

You can find full details on the personal information collected and processed in our [PAIA Manual](#).

Do we collect children's personal information?

Children are minors under the age of 18. We do not permit children to register on our websites, mobile application, or other digital services without the permission of their parents or legal guardian(s).

In general, Alexander Forbes collects and uses personal information of children during normal business activities, usually because children are listed as beneficiaries or dependants on some products and services that we provide. When we collect and use personal information of children, we always try to ensure that:

- we have the consent of their parents or legal guardians
- it is in the best interests of the child
- their personal information is carefully protected

How do we use personal information?

In general, Alexander Forbes collects and processes personal information for the following purposes:

-  Providing corporate and employee benefits, retirement, asset management, insurance and wealth management products and services to clients and members, including any related communications
-  Registration on and use of our websites, mobile applications and other digital channels
-  Employment processes, both our own, and those of our clients where applicable
-  Procurement processes
-  Our standard business operations (including audits, market research, statistical analysis, product development, or where there is another legal basis for doing so)
-  Compliance with our legal obligations under any statutory or regulatory requirements
-  For law enforcement, investigations, or court proceedings where requested and where this request is legal

How long do we retain personal information and keep it secure?

We only keep personal information for as long as it is needed to fulfil our contractual obligations, or to otherwise comply with any applicable laws.

We also keep certain information for historical purposes, particularly since individuals often have a relationship with Alexander Forbes spanning many years or even decades. We will keep your information secure and confidential for as long as we retain it.

How do we source personal information?

Owing to the nature of the products and services that Alexander Forbes provides, we often collect personal information from your employer depending on the nature of the business relationship or contractual agreements that are in place. Where required, we also collect your information from other organisations at your direction or with your permission, or to otherwise comply with legal requirements.

For other types of business relationships, we try to collect personal information directly from you as far as possible. However, we will always make your information available to you in accordance with your rights, should you request it from us.

Do we share personal information with third parties?

Alexander Forbes will never sell your personal information and does not share personal information with third parties for their own marketing purposes.

We may share your personal information with the following:

1

Service providers

Alexander Forbes may engage with third parties to help provide certain services or fulfil parts of our business operations. Our service providers are obligated to handle personal information in accordance with the law and the contracts we have with them. This may include providing your information to banks, the Department of Home Affairs, tracing agents, or other organisations for verification. They may not use this data for their own purposes, and are required to delete or return it once they've completed our instructions.

2

Affiliates and partners

At times, Alexander Forbes may partner with other organisations to provide you with products or services, including independent brokers and consultants. Alexander Forbes requires its partners to protect your personal information and act in accordance with this privacy notice.



3

Others

We may share your information with other organisations at your instruction or with your consent (for example if you provide us with a letter of authority to do so). We may also disclose information about you for the purposes of legal compliance, law enforcement, national security, or any other lawful basis for doing so. In the event of a sale, merger, or corporate restructuring, it may be reasonably necessary to disclose your personal information as part of this event.

What security measures are in place to protect information?

We take the security of personal information very seriously and always do our best to comply with data protection laws. Alexander Forbes strives to uphold strong global practices and standards as it pertains to information security, and we have suitable organisational, technical and physical safeguards in place to protect personal information across our operations. We are continually working to improve these safeguards to help keep your personal information safe.

Do we use automated decision-making and profiling?

Alexander Forbes does not use algorithms or profiling to make any decision that would significantly affect you without allowing the opportunity for human review or for you to appeal the decision.



Are we aligned with international considerations and laws?

We believe that your privacy rights shouldn't be based on where you live. That's why we've aligned our privacy and data protection practices to all leading international laws and best-practice standards across all our operations, regardless of jurisdiction.

All entities in our Group are obliged to adhere to the Alexander Forbes Group Privacy Policy. As Alexander Forbes is a South African-based company, we have a primary duty and obligation to comply with the *Protection of Personal Information Act 4 of 2013*, but also to observe the requirements of other jurisdictions in which we operate. If there are more stringent requirements in these jurisdictions, then these are identified and adhered to as applicable.

Is personal information transferred internationally?

Most notably, Alexander Forbes operates in South Africa, Botswana, Namibia, Jersey (UK) and Nigeria. Alexander Forbes complies with the legal requirements for transferring personal information between jurisdictions to make sure that your personal information is protected wherever it might be.

We also make use of international service providers, and as far as possible try to ensure that these organisations are in jurisdictions with strong data protection laws, such as the European Union or the United Kingdom. Service providers are further obligated to adhere to security requirements contained within the contracts that Alexander Forbes has with them.

Do we use cookies and other tracking technology?



Alexander Forbes websites, mobile applications and digital channels may use cookies or other technologies (such as web beacons or pixel tags). These technologies allow us to better understand the behaviours of our users so that we can improve or customise the experience on these platforms.

If you would prefer not to make use of cookies, there are ways of disabling them from within your web browser – usually under the privacy settings. Certain features of our websites may not be available if all cookies are disabled.

Pixel tags can help us to track our email communications and understand if the mail has been opened. We use this data to reduce or eliminate correspondence sent to our clients and improve our communications with you.

Do we link to third-party sites and services?

In some cases, we provide links to external companies, service providers or their websites. We do not have any control over these organisations, so please make sure that you are comfortable with their own privacy policies and practices before providing them with any of your personal information.

Do you have any other privacy questions?

If you have questions about this privacy notice or our privacy practices, you are welcome to contact a member of our privacy team on zzprivacy@forbes.com.

If you are in Jersey, such queries can be directed to dataprotection@forbes.co.je.

For complaints, please follow the procedure described on our website (<https://www.alexanderforbes.co.za/contact-us/complaints-handling-procedure>) or send an email to contactus@forbes.co.za.

If you are not satisfied with how Alexander Forbes has handled your personal information or the outcome of using any of the above channels, you have a right to complain to the Information Regulator (South Africa), but please afford us the opportunity to rectify our mistake before contacting them.



Will we make changes to this privacy notice and when would these changes take effect?

Alexander Forbes reserves the right to update this privacy notice from time to time. We advise you to review this page periodically for any changes. We will notify you of any changes to this privacy notice on our website, and the changes will take effect immediately once published. We may also notify you in other ways regarding changes to this privacy notice and the processing of your personal information.