

This management Policy and procedures relates to the licensed Financial services provider trading as **Toptrans Underwriting Managers (Pty) Ltd, FSP 37014**

Application (scope)

This policy applies to all employees, which are deemed to include:

- Director
- Permanent staff

1. INTRODUCTION

- 1.1. **Toptrans Underwriting Managers (Pty) Ltd** is a short-term insurance intermediary who is obliged to comply with the Protection of Person Information Act (“POPI”)
- 1.2. POPI requires Toptrans Underwriting Managers to inform their clients as to how their Personal Information is used, disclosed and destroyed.
- 1.3. This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within our organisation and provides principles regarding the right of individuals to privacy and to reasonable safeguarding of their personal information.

The Information Officer is responsible for:

Conducting a preliminary assessment.

- The development, implementation and monitoring of this policy and compliance framework;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that documentation is relevant and kept up to date;
- Ensuring this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.
- All employees, departments and individuals directly associated with us are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

Policy Principles

Principle 1: Accountability

- We must take reasonable steps to ensure that personal information obtained from Clients is stored safely and securely.

Principle 2: Processing limitation

- We will collect personal information directly from Clients.
- Once in our possession we will only process or release client's information with their consent, except where we are required to do so by law. In the latter case we will always inform the client

Principle 3: Specific purpose

- We collect personal information from Clients to enable us to offer short term solutions to our clients.

Principle 4: Limitation on further processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially. We collect personal information for Short term insurance solutions to our clients and it will only be used for that purpose.

Principle 5: Information quality

- We are responsible for ensuring that client information is complete, up to date and accurate before we use it. This means that it may be necessary to request Clients, from time to time, to update their information and confirm that it is still relevant. If we are unable to reach a client for this purpose their information will be deleted from our records.

Principle 6: Transparency/openness

- Where personal information is collected from a source other than directly from a client, we are responsible for ensuring that the client is aware:
 - That their information is being collected;
 - Who is collecting their information by giving them our details;
 - of the specific reason that you are collecting their information.

Principle 7: Security safeguards

- We will ensure technical and organisational measures to secure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof.
- Personal information must also be protected against any unauthorised or unlawful access or processing.
- We are committed to ensuring that information is only used for legitimate purposes with client consent and only by authorised employees of our FSP.

Principle 8: Participation of individuals

- Clients are entitled to know particulars of their personal information held by us, as well as the identity of any authorised employees of our FSP that had access thereto. They are also entitled to correct any information held by us.

2. THE PERSONAL INFORMATION COLLECTED

2.1 Toptrans Underwriting Managers collects and processes clients Personal Information pertaining to client's insurance 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 includes but is not limited to:

- 2.1.1. Company name, Company Registration Number, VAT Nr, Physical Address, Postal Address. If Sole Proprietor ID Nr, Clients personal Name and Surname, Contact Numbers.
- 2.1.2. any other information required by us, suppliers and insurers in order to provide clients with an accurate analysis of their insurance needs.

2.2 Toptrans Underwriting Managers also collects and processes clients Personal Information for marketing purposes to ensure our products and services remain applicable to our clients and potential clients.

2.3 We have agreements in place with all our products 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.

2.4 We may also supplement the information provided with information we receive from other providers to offer a more consistent and personalised experience in clients' interaction with us.

2.5 For purposes of this Policy, clients include potential and existing clients.

3. HOW PERSONAL INFORMATION IS USED

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

This may include:

- 3.1. Providing products or services to clients and to carry out the transactions requested;
- 3.2. For underwriting purposes;
- 3.3. Assessing and processing claims;
- 3.4. Conducting credit reference searches or verification;
- 3.5. Confirming, verifying and updating client's details;
- 3.6. For purposes of claims history;
- 3.7. For the detection and prevention of fraud, crime, money laundering or other malpractice;
- 3.8. Conduction market or customer satisfaction research;
- 3.9. For audit and record keeping purposes;
- 3.10. In connection with legal proceedings
- 3.11. Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
- 3.12. Providing communications in respect of Toptrans Underwriting Managers and regulatory matters hat may affect client; and
- 3.13. In connection with and to comply with legal and regulatory requirements or when it is otherwise Allowed by law.
- 3.14. In terms of the provisions of POPI, Personal Information may only be processed if certain conditions are met which are listed below along with supporting information for Toptrans Underwriting Managers processing for Personal Information:
- 3.15. Client consents to the processing – consent is obtained from clients during the introductory, appointment and needs analysis stage of our relationship;
- 3.16. The processing is necessary – in order to conduct an accurate analysis of client's insurance needs, certain Personal Information required;
- 3.17. Processing complies with an obligation imposed by law on Toptrans Underwriting Managers – The Financial Advisory and Intermediary Services Act ("FAIS") requires Financial Service Providers ("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.
- 3.18. Processing protects the 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;

3.19. Processing is necessary for pursuing the legitimate interest of Toptrans Underwriting Managers or of a third party to whom information is supplied. In order to provide our clients with products we, suppliers and insurers need certain personal information from clients to make an expert decision on the specific product they require.

4. DISCLOSURE OF PERSONAL INFORMATION

- 4.1 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.
- 4.2 We may also share client Personal Information with, and obtain information about clients from third parties for the reasons already discussed in 2.4 above.
- 4.3 We may also disclose client's information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it is may be necessary to protect our rights.

5. SAFEGUARDING CLIENTS INFORMATION

- 5.1. 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.
- 5.2. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that your Personal Information is kept secure.
- 5.3. 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 a similar level of protection as afforded to you by us.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

6.1 Clients have the right to access the Personal Information we hold about them. Clients also have the right to request us to update, correct or delete their Personal Information on reasonable grounds. Once a client objects to the processing of their Personal Information, Toptrans Underwriting Managers may no longer process said Personal Information. 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

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

INFORMATION OFFICER DETAILS

Telephone Number:	+27 (0) 11 622 0142
Postal Address:	P.O. Box 15683, Lambton,1414
Physical Address:	31a Arterial Road West Oriel Bedfordview 2008
Email Address	tammy@toptrans-uma.co.za
Website	www.toptrans-uma.co.za

7. Distribution

This policy is to be distributed to all **Toptrans Underwriting Managers staff**.

It is a requirement that each staff member *acknowledge receipt and full understanding* of the above company Policy

