

360 Administration & Systems - Privacy Notice

This privacy notice provides details of the personal information we collect from you, what we do with it, how you might access it and who it might be shared with.

Our Organisation

360 Administration & Systems
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1725
South Africa
Mobile: +27836257280
Telephone: +27115681018
Organisation email: stephens@pol360.co.za

ATTENTION all children.

This is a very important notice which we must share with you and any one of your parents or legal guardians. To make use of our services, we need information which is personal to you. For example, your name, your email address and your phone number. It might be so that we cannot use your information unless your parent agrees. Please tell your parents to read the notice below.

ATTENTION all parents / legal guardians

In order for children to make use of our services we need to use their personal information and for this we are required by law to obtain the consent of a parent or legal guardian. Before deciding on consent it is important for parents to understand our information security and privacy policies. It is equally important for parents to explain to children, the implications of not providing our organisation with the proper consent. A link to our consent form can be found wherever we collect personal information of children.

What we do with your personal information

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Insurance Brokers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Client Services, Sales and Payments	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Compliance Processes	S11 - We, the Responsible Party must comply with a legal obligation	Until contract completed

From our **Prospective Client** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - We have the data subject's consent	Until consent withdrawn

From our **Policy Holders** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Policy Application	S11 - It is in the legitimate interest of a third party to whom the information is supplied (All Policies underwritten by 1 Life Insurance Ltd)	Until tax or other legal retention period expires
Refunds	S11 - We have the data subject's consent	Until tax or other legal retention period expires
Customer sales, service and support	S11 - We have the data subject's consent	Until tax or other legal retention period expires
Retention	S11 - It is in the legitimate interest of a third party to whom the information is supplied (1Life Project where Policy Holder information is supplied to 360 A&S)	Until tax or other legal retention period expires
Insurance Claims	S11 - It is in the legitimate interest of a third party to whom the information is supplied (1 Life Insurance Ltd processes all Customer claims)	Until tax or other legal retention period expires
Premium Collection	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires

From our **Clients** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
To conclude or perform a contract	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Compliance Processes	S11 - We, the Responsible Party must comply with a legal obligation	Upon conclusion of the service, event or promotion

From our **Agents** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Client Services, Sales and Payments	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Compliance Processes	S11 - We, the Responsible Party must comply with a legal obligation	Until contract completed

From our **Prospective Employees** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Unsolicited Applications	S11 - We have the data subject's consent	Until no longer needed for purposes of proof

From our **System Users** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion

From our **Potential Policy Holder** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Policy Application	S11 - We have the data subject's consent	Until no longer needed for purposes of data subject's access

From our **Suppliers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Supplier Management and Payment	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Compliance Processes	S11 - We, the Responsible Party must comply with a legal obligation	Upon conclusion of the service, event or promotion

What personal information do we collect?

We only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services. If you visit our website, your browser transmits some data automatically, such as your browsing times, the data transmitted and your IP address.

If you use our services, personal information is required to fulfill the requirements of that service.

Generally, we collect the following personal information. If there is any *specific* personal information to collect, we will indicate as such, at or near the time of collection.

- Identification Number
- Email address
- Financial & banking details
- Physical address
- Telephone number
- Employee Number/ Agent Code
- Beneficiary Details
- Postal Address
- Cell Phone Number
- Name of Employer
- Payslip
- Bank Statements
- Dependents and Extended Dependents Details
- Names and Surname
- Company Name and Registration
- Education history
- Employment history
- Online identifier
- VAT Number
- Designation
- Signature
- IP Address
- User Name
- Curriculum Vitae

Special personal information could be about your health, your racial or ethnic origin, your trade union membership etc. We collect the following special personal information, under the appropriate lawful basis.:

- Medical History and Confirmation
 - S27 - We have the data subject's consent

- Children's Personal Information
 - S27 - The information has deliberately been made public by the data subject
 - S27 - We have the data subject's consent

We collect your personal information from the following indirect sources

Data subject type	Personal information type	Indirect source name
Policy Holders	Employee Number/ Agent Code	Broker
Agents	Employee Number/ Agent Code	Broker
Policy Holders	Beneficiary Details	Broker
Insurance Brokers	Postal Address	Client
Agents	Postal Address	Broker
Policy Holders	Postal Address	Broker
Policy Holders	Cell Phone Number	Broker
Insurance Brokers	Cell Phone Number	Client
Agents	Cell Phone Number	Broker
Agents	Name of Employer	Broker
Policy Holders	Name of Employer	Broker
Policy Holders	Payslip	Broker
Policy Holders	Bank Statements	Broker
Policy Holders	Dependents and Extended Dependents Details	Broker
Agents	Names and Surname	Broker
Insurance Brokers	Names and Surname	Client
Policy Holders	Names and Surname	Broker
Insurance Brokers	Company Name and Registration	Client
Insurance Brokers	VAT Number	Client
Policy Holders	Online identifier	Broker
Insurance Brokers	Physical address	Client
Policy Holders	Physical address	Broker
Agents	Physical address	Broker
Policy Holders	Identification Number	Broker
Agents	Identification Number	Broker
Clients	Identification Number	Broker
Insurance Brokers	Telephone number	Client
Policy Holders	Telephone number	Broker
Agents	Telephone number	Broker

Agents	Education history	Broker
Agents	Employment history	Broker
Policy Holders	Email address	Broker
Agents	Email address	Broker
Policy Holders	Financial & banking details	Broker
Agents	Financial & banking details	Broker

Who might we share your personal information with?

To maintain and improve our services, your personal information may need to be shared with or disclosed to our service providers, other organisations such as ours or, in some cases, public or legal authorities.

We transfer personal information to the following organisations and countries: Names of Organisations may be shared with interested parties based on requests received for access to specific information.

Data subject type	Organisation name	Type	Country
Insurance Brokers	Communication Provider	Operator	South Africa
Insurance Brokers	Communication Provider	Operator	United States
Insurance Brokers	Clients with whom we have Agreements	Responsible Parties	South Africa
Insurance Brokers	Data Protection Software Provider	Operator	Ireland
Insurance Brokers	Payment/Financial Solutions Provider	Operator	South Africa
Insurance Brokers	Data Storage and Security Provider	Operator	United States
Insurance Brokers	Financial Solutions Provider	Operator	South Africa
Insurance Brokers	Consulting Services Provider	Operator	South Africa
Policy Holders	Telecommunications Provider	Operator	South Africa
Policy Holders	Communications Provider	Operator	United States
Policy Holders	Financial Services Provider	Operator	South Africa
Policy Holders	Financial Services Conduct Authority	Responsible Party	South Africa
Policy Holders	Data Storage and Security Provider	Operator	United States
Policy Holders	Records Management Provider	Operator	South Africa
Clients	Communications Provider	Operator	South Africa
Clients	Communications Provider	Operator	United States
Clients	Financial Solutions Provider	Operator	South Africa
Clients	Data Storage and Security Provider	Operator	United States
Clients	Financial Services Provider	Operator	South Africa

Clients	Software Solutions Provider	Operator	South Africa
Agents	Financial Services Conduct Authority	Responsible Party	South Africa
Agents	Consulting Services Provider	Operator	South Africa
Suppliers	Financial Services Provider	Responsible Party	South Africa

For the following purposes we may disclose your personal information to authorised third parties because it's in their legitimate interests:

- Policy Application
- Retention
- Insurance Claims

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

How do we look after personal information?

We limit the amount of personal information collected to only what is fit for the purposes as described above. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal information only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal information for historical or statistical purposes we ensure that the personal information cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

How can you access your personal information?

You have the right to request access to any of your personal information we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

If you would like to make a request to see what personal information of yours we might hold, you may make a request from our organisation website or contact us as per the details above

Where you have previously given your consent to process your personal information, you also have the right to request that we transmit your personal information to a different service provider.

Where it may have been necessary to get your consent to use your personal information, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal information without affecting the lawfulness of processing based on consent before your withdrawal.

Our Information Officer

Stephen Sands
 stephens@pol360.co.za



The SA Information Regulator

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below.

The Information Regulator (South Africa)

POPIA complaints:

POPIAComplaints@inforegulator.org.za

PO Box 31533,

Braamfontein,

27 Stiemens St,

Braamfontein, 2017.