



KEYSTONE ACTUARIAL SOLUTIONS

PRIVACY NOTICE: PROTECTION OF PERSONAL INFORMATION ACT, 2013

Keystone Actuarial Solutions (Pty) Ltd (“Keystone”, “we” or “us”) holds and processes personal information about data subjects. This information is collected in connection with the services we provide to our clients.

This Privacy Notice complies with Section 18 of the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”) and may be updated from time to time to reflect changes in the law, changes in our business or the services we provide. It also explains the rights of data subjects in relation to their personal information which is processed by us.

KEYSTONE ACTUARIAL SOLUTIONS: WHO WE ARE

Keystone is an actuarial consultancy based in Johannesburg, South Africa. We specialise in providing high quality, genuinely independent advice and services to the boards of retirement funds and to the sponsors of such funds. Our consulting actuaries share a common vision that independent, focussed consulting advice, provided by an experienced team, will result in better outcomes for retirement fund members and pensioners.

Keystone is a registered financial services provider - FAIS licence number: 48825

DOES THIS PRIVACY NOTICE APPLY TO YOU?

This Privacy Notice explains how we process personal information in relation to data subjects. This Privacy Notice applies to you if Keystone obtains and processes your personal information as a result of the actuarial, consulting or liquidation services we provide to your retirement fund (or to a retirement fund which you were previously a member of) or directly to your employer for another purpose. If you are reading this Privacy Notice, you may be a data subject for whom we hold personal information.

POPIA requires that we handle personal information in a certain way and that we make certain disclosures regarding how we handle your personal information. This information and the required disclosures are set out in this Privacy Notice.

We are committed to protecting your privacy and ensuring that your personal information is dealt with in a manner which is fair, lawful and transparent.

WHO DO WE COLLECT INFORMATION FROM?

We may collect information directly from you, the data subject, with your consent. In most cases, however, it is not reasonably practicable to do this. In these cases, we will collect your information from another party on your behalf - this other party could be:

- ❖ your retirement fund (or a retirement fund of which you were previously a member);
- ❖ your employer (or former employer),
- ❖ a registered retirement fund administrator;
- ❖ a registered insurance company or medical aid scheme;
- ❖ a publicly accessible register or database; or
- ❖ another third party which holds your personal information and which has been authorised to provide this information to us.

We may also pass your personal information on to a third party, provided that we have been authorised by our client to do so, we are required to do so to fulfil a contractual obligation or provide the services agreed with our clients or we are required to do so by law.

WHAT TYPE OF INFORMATION DO WE COLLECT?

The type of information we collect will depend on the purpose for which it is collected and used. The information collected may include, amongst others:

- ❖ Demographic information, such as your gender, date of birth, occupation, marital status and details of your dependents.
- ❖ Contact information, such as your address, email address, and telephone number.
- ❖ Identity information, such as name, ID or passport number, pension number, employee number.
- ❖ Financial information, such as your salary, pension or retirement fund benefit.
- ❖ Special personal information, such as your race or information on your health.
- ❖ Website usage information (standard internet visitor usage information).

HOW DO WE USE YOUR INFORMATION?

We will only collect and use information that we require for specific purposes agreed with our clients, to comply with legal and regulatory requirements or to protect your rights, the rights of our clients or our rights.

The services which we provide to our clients (which may require us to collect and process your personal information) include, but are not limited to:

- ❖ Statutory actuarial services to retirement funds, for example being the appointed valuator to a retirement fund.
- ❖ Other actuarial services to retirement funds, private companies or employers in the public sector.

- ❖ Consultancy services to retirement funds, private companies or employers in the public sector, including, where relevant, advice on the distribution of death benefits (to beneficiaries who are not members or employees).
- ❖ Risk benefit consulting services.
- ❖ Liquidation services to retirement funds.

We will never use your personal information for any purpose not described above without your prior consent or the prior consent of the client on behalf of which we have received and processed your information.

HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

We will retain your personal information for as long as is necessary to provide the agreed contractual services to our clients. When we no longer need your personal information in connection with services to a specific client, we will then retain your personal information for a reasonable period of time that allows us to comply with our regulatory obligations and to commence or defend legal claims.

Information which is no longer required in terms of our retention policy will be removed from data servers – our backup retention period is 3 years and data held in online backup facilities will automatically be deleted at the end of this period.

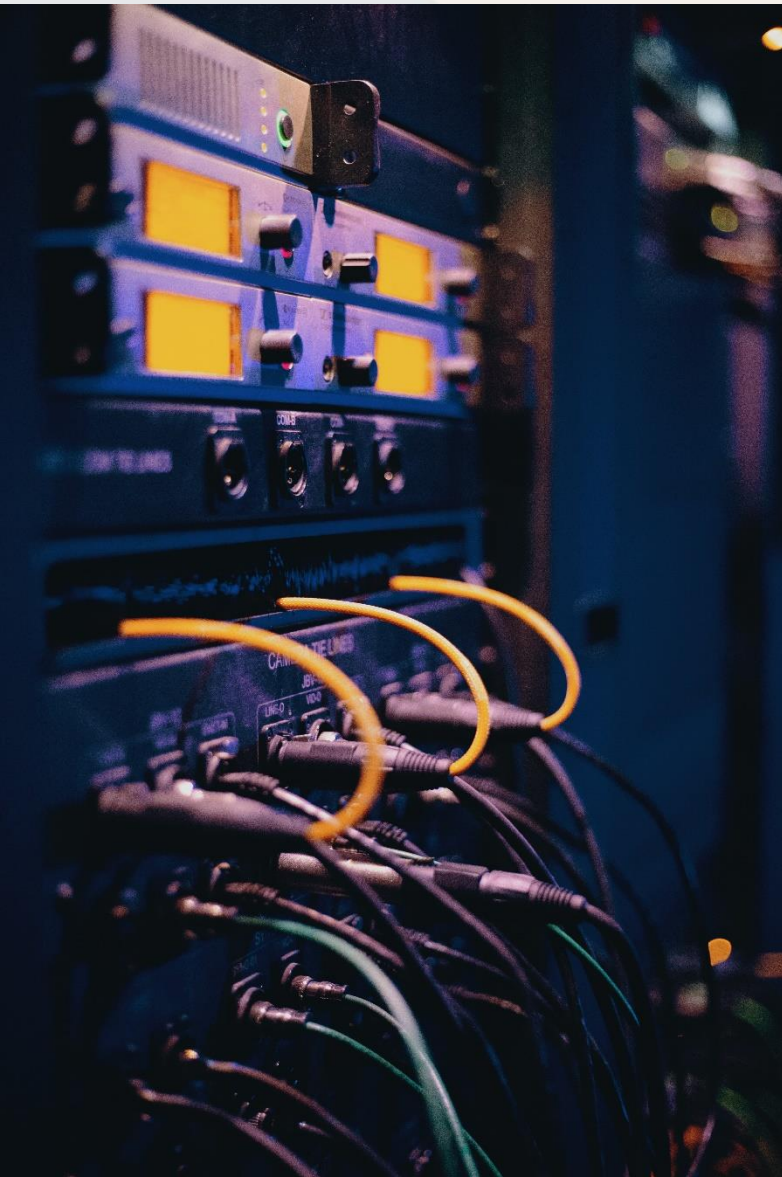
HOW DO WE MAKE SURE YOUR INFORMATION IS PROTECTED AND SECURE?

We take the protection of your personal information very seriously. We are obliged to protect the personal information we hold and to detect and stop unauthorised access, use or loss of such information.

We review our security controls and related processes on a regular basis to ensure that your personal information is safe.

Our security policies and procedures cover, amongst others:

- ❖ Physical security, such as the restriction of access to premises, hardware and IT systems.
- ❖ Computer and network security, including encryption, protection against malware and viruses, firewalls, back-ups and disaster recovery systems.
- ❖ Restriction of access to personal information and secure communications with external parties.
- ❖ Retention and disposal of information.
- ❖ Investigating and reacting to security incidents.



In the unlikely event that your personal information held by us becomes compromised due to an information security breach, we will act promptly to identify and remedy the cause of such breach and to mitigate the effects thereof. Where necessary, we will also notify the Information Regulator and you (and / or the relevant client) in accordance with applicable laws.

DO WE TRANSFER YOUR PERSONAL INFORMATION OVERSEAS?

Our approach to the transfer of data to jurisdictions outside of South Africa is described below:

- ❖ Keystone is a South African company – we do not have affiliates or associated companies (inside or outside of South Africa and do not, therefore, share data with any parties other than as provided for in our agreements with our clients or as specified above. Other than in respect of clients outside of South Africa and for certain cloud services, we will never transfer personal information outside of South Africa.
- ❖ The personal information on our file server and e-mail server is backed-up / hosted in South Africa. As such, this data never leaves our shores.
- ❖ Personal information may be transferred via other Microsoft cloud services – these services are hosted in the European Union (which has similar, or more onerous, laws regarding the protection of personal information). Furthermore, data is encrypted in transit and at rest and services are FIPS 140-2 validated. Such services, provided to us by Microsoft, will be migrated to South Africa by 1 July 2022. From that date, we will not store any information on servers outside of South Africa.
- ❖ Where we have clients in other countries (for example, Namibia or Botswana), personal information (in respect of data subjects who are resident in such other countries) may be transferred between us and our clients / third parties in those countries. In this regard, the data will have originally been provided by the client or third party from outside South Africa and we will ensure that we protect the data in accordance with the requirements of POPIA.

WHO CAN I CONTACT REGARDING MY PERSONAL INFORMATION?

If you wish to exercise your legal right to review, access, correct or update your personal information or to object to, or restrict the processing of your personal information held by us, please contact us via e-mail at: **contact@keystoneas.co.za**. Alternatively, you may contact us telephonically at: **+2710 900 4629**.

In your request, please make clear what personal information you would like to have changed, whether you would like to have your personal information deleted from our database or otherwise let us know what limitations you would like to put on our use of your personal information. For your protection, we will need to verify your identity before implementing your request.

Importantly, your right to access, correct or delete your personal information could be subject to certain legal exemptions, and where any legal exemption applies, we may not be able to comply with your request in relation to your personal information. Furthermore, we may need to retain certain information for recordkeeping, contractual or other purposes and there may also be residual information that will remain within our databases and other records, which cannot be changed or removed for a period of time.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. Please address any such complaints or concerns to:

The Information Officer
Keystone Actuarial Solutions (Pty) Ltd
2nd Floor, East Block
28 Fricker Road
Illovo
2196
Tel: +27 10 900 4629
E-mail: info@keystoneas.co.za

Further information regarding how you can request access to or correction / deletion of your personal information, including the explanation of the circumstances in which we may decline to comply with your request and an explanation of charges that may apply to the handling of your request is available upon request.

If, however, you believe that we have not been able to assist with your complaint or concern regarding the way in which we have handled your personal information, and you wish to make a formal complaint (or if you would like to learn more about your rights under POPIA), you may contact the Information Regulator at:

The Information Regulator
Salu Building
316 Thabo Sehume Street
Pretoria
Tel: +27 12 406 4818
E-mail: inforeg@justice.gov.za

CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes in law or changes in our business operations. When we do make a change, we will post the current version on our website, and we will revise the version number and date located at the bottom of each page.

It may not be reasonably practicable for us to notify you directly of changes to this Privacy Notice and, as such, we encourage you to periodically review this Notice on our website so that you will be aware of our privacy practices.

IF YOU HAVE ANY QUESTIONS OR WOULD LIKE MORE INFORMATION ON THIS PRIVACY NOTICE OR ON THE PROTECTION OF PERSONAL INFORMATION HELD BY US, PLEASE LET US KNOW
