

# CUSTOMER PRIVACY NOTICE

## INTRODUCTION

This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act ("PPI").

Personal information is any information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person, for example, information relating to race, gender, sex, marital status, physical or mental health, criminal or employment history, biometric information, personal opinions or views, addresses, telephone numbers and names where it appears with other information.

At Old Mutual we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Notice sets out:

- Who we are
- What information we collect
- How we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Changes to this Notice
- How to contact us

## WHO WE ARE

Old Mutual Finance is a company in the Old Mutual Group.

In this Notice, "Old Mutual", "Old Mutual Group" or "we" refers to one or more of the companies in the Old Mutual Group that operate in South Africa.

## THE INFORMATION WE COLLECT

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 in the Old Mutual Group in order to offer you a more consistent and personalised experience in your interactions with Old Mutual.

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

## **HOW WE USE YOUR INFORMATION**

We may use your information or obtain information about you for the following purposes:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship;
- Underwriting;
- Assessment and processing of claims;
- Credit searches and/or verification;
- Confirming and verifying your identity;
- Operations, and where applicable, credit scoring and assessment and credit management;
- Claim checks (ASISA Life and Claims Register);
- Tracing beneficiaries;
- Fraud Prevention and detection;
- Debt tracing or debt recovery;
- Conducting market or customer satisfaction research or for statistical analysis;
- Audit and record keeping purposes;
- Legal proceedings;
- Sharing information with our associates and service providers we engage to process such information on our behalf or who renders services to us. These service providers may sometimes be in other countries, but we will never share your information with these service providers unless we are satisfied that the service provider offers an adequate level of protection to your personal information.

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 (for example to protect Old Mutual's interests).

## **ONGOING FINANCIAL SERVICES**

Given the Old Mutual Group's aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which we offer and which may be of particular interest to you.

We will provide you with the opportunity to decline to receive such financial services information. If you agree to receive the information, you may withdraw your consent at any time if you don't want to receive any further

communications of this nature by visiting one of our branches or contacting our Customer Call Centre at the number below; or you can sms your ID number to 30994.

## **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 our service providers and associates, credit reference and fraud prevention agencies, law enforcement agencies;
- Other financial institutions to prevent fraudulent transactions;
- Other companies in the Old Mutual 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. To do this, simply contact us and specify what information you would like.

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.

## **CORRECTION OF YOUR INFORMATION**

You have the right to ask us to update, correct or delete your personal information.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate.

## **CONTACT US TO EXERCISE THESE RIGHTS**

You may access, correct or update your personal information by visiting one of our branches or contacting us via our Customer Call Centre at the number provided below.

In certain cases you have the right to object to the processing of your personal information. You have the right to complain to the Information Regulator, whose contact details are:

Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)

Tel: 012 406 4818

Fax: 086 500 3351

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

## **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:

Customer Call Centre  
0860 445 445