

Origin Financial Holdings 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

Origin Financial Holdings
17 Gants Plaza, Langenegger Street
Strand
7140
South Africa

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.

Where we collect the personal information of children as beneficiaries, we will request the explicit consent from the legal guardians.

As a client or prospective client, we use your personal information for other similar purposes, including marketing and communications. This will only occur in the case where we have your consent or another lawful justification for doing so.

We collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis:

Category of Person	Processing Purpose	Lawful Basis	Retention Period
Prospective Clients	Financial Management Services	S11 - We have the data subject's consent	Until consent withdrawn
	Managing an opt-out list for marketing purposes	S14 – In the public interest	Until no longer needed for purposes of proof
Clients	Financial Management Services	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
	Managing an opt-out list for marketing purposes	S14 – In the public interest	Until no longer needed for purposes of proof
Service Providers/Brokers	Financial Management Services	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof

Beneficiaries, Legal Guardians, Children	Financial Management Services	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Suppliers	Management and provision of business services	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Consultants	Management and provision of business services	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Prospective Employees	Recruitment management	S11 - We have the data subject's consent	Until consent is withdrawn

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 and the data transmitted.

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

Generally, we collect the following personal information from our prospective clients:

- First name
- Last name
- Initials
- Email
- Gender
- Telephone number

Generally, we collect the following personal information from our clients:

- First Name
- Last Name
- Initials
- Gender
- Physical address
- Identification Number
- Telephone number
- Name, together with other identifying information
- Confidential Correspondence
- Email address
- Financial & banking details
- Personal opinions, views or preferences
- Unique identifier

Special personal information may be required to provide you with the required services and could include information about your health, your race or ethnic origin. We collect the following special personal information, under the appropriate lawful basis and keep it until no longer required for the burden of proof:

- Medical Information
 - S27 - For the establishment, exercise or defence of a right or obligation in law
- Race or ethnic origin
 - S27 - For the establishment, exercise or defence of a right or obligation in law

From prospective employees we will collect the following information for recruitment purposes:

- First Name
- Last Name
- Initials
- Gender
- Physical address
- Identification Number
- Telephone number
- Name, together with other identifying information
- Confidential Correspondence
- Email address
- Personal opinions, views or preferences
- Education history
- Employment history

We collect the following special personal information from prospective employees which is required for the recruitment process, under the appropriate lawful basis and retain it only for the period until no longer required for the purpose it was collected:

Criminal history

- S27 - we have the data subject consent

Race or ethnic origin

- S27 - For the establishment, exercise or defence of a right or obligation in law

Who might we share your personal information with?

To maintain and provide you with our services, we may need to share or disclose your personal information with Responsible parties. These parties include insurance companies, financial institutions, public or legal authorities as applicable.

We have the relevant agreements in place with such Responsible Parties for your further protection.

Where we have sub-contractors who are considered Operators, we enter into Operator's Agreements to protect your personal information. We review these agreements annually.

Some Operators host their servers and back-up servers in Europe and therefore Personal Information is transferred across South African borders. These countries have similar protection laws under GDPR.

We will not share your personal information with third parties for secondary or unrelated purposes unless otherwise disclosed on collection.

We use cloud services with servers outside of South Africa, in the USA. We apply the necessary safeguards to protect your personal information. Detail of these safeguards may be obtained by contacting us directly by sending an email to popia@originfin.com

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.

While in our possession, together with your assistance, we try to maintain the accuracy of 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 by informing us of any changes to your personal information. We require you to inform us of any changes in order for us to maintain the quality and accuracy of the data. You can submit your request by submitting the online forms by visiting our website <http://www.originfin.com>

If we are improperly using your information, you may request that we stop using it. Any requests are subject to applicable laws pertaining to our industry.

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. Your request will be subject to applicable laws pertaining to our industry.

Where it may have been necessary to get your consent to use your personal information, 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. Your request will be subject to applicable laws pertaining to our industry.

Security

The security of your personal information is important to us, however no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We have all reasonable commercial standards of technology and operational security in place to protect all information provided by data subjects from loss, misuse, alteration or destruction.

All reasonable steps will be taken to secure our data subjects' data. Authorised employees or service providers who are responsible for the maintenance of any data submitted, are required to maintain the confidentiality of such data.

It is expressly prohibited for any person, business or entity to gain or attempt to gain unauthorised access to our platforms, or to deliver or attempt to deliver any unauthorised, damaging or malicious code to our platforms. If a person delivers or attempts to provide any unauthorised, harmful or malicious code to our platforms or attempts to gain unauthorised access to any platform, a criminal charge will be laid against that person, and, if we or any public body should suffer any damage or loss, civil damages will be claimed.

Our Information Officer:

Mr. Stefan Olivier

Telephone: +27(0)861187878

popia@originfin.com

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)

PO Box 31533

Braamfontein

27 Stiemens St

Braamfontein

2017

complaints.IR@justice.gov.za

infoereg@justice.gov.za