



GQM FUND ADMINISTRATORS (PTY) LTD PRIVACY STATEMENT

Date from which this privacy statement applies: 1 July 2021

Purpose of this privacy statement

This privacy statement sets out how the GQM Fund Administrators (Pty) Ltd collects, uses and protects the personal information of members (including paid-up and deferred members) to comply with the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). This privacy statement also informs members of their rights in terms of POPIA.

Collection and Use of Personal Information

Personal information is defined in POPIA as information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person. We "process" members personal information if we collect, use, store, make available, destroy, update, disclose, receive or otherwise deal with that personal information.

The main purpose of GQM and therefore the funds it administers is, on behalf of members, to receive monthly contributions for retirement funding purposes, to invest these contributions and pay members' benefits in terms of the registered rules of the funds it administers.

The personal information that we collect and process is used mostly for this reason. GQM must also collect and process information to comply with the laws of South Africa.

What personal information do we collect?

We may collect personal information including members' names, gender, surnames, language, identity and/or passport numbers, contact details, nationalities, employment status, information about beneficiaries (special personal information), demographic information (e.g. ages, races), financial information including bank account details, tax information, records of claims, and in some cases, members' health or medical information, including disability status (special personal information), and biometric information such as fingerprints and voice recordings (where necessary).

How we use members' personal information?

Members' information is collected and used, for example, to provide fund benefits, keep records updated, make payments, contact and communicate with them, and comply with the laws of South Africa.

We may further process members' information if it is compatible with the purpose for which it was collected, for instance, to conduct statistical and other audits, operational, legal and record keeping requirements or to trace ex-members through a tracing agent if they are uncontactable and/or to comply with any regulation or conduct standard relating to unclaimed assets.

Source and disclosure of personal information

We receive members' personal information directly from the participating employers and may provide it to other appointed fund service providers so that they can provide the services agreed to in terms of formally signed agreements.

In terms of our formal signed agreements, we require all service providers to only use the information for the required purpose and to handle members' personal information appropriately and securely and to comply with all relevant laws.

We confirm that:

- GQM does not and will not sell personal information or provide members' information to any third parties to use for their own marketing purposes and unsolicited electronic communication.
- It may be necessary for GQM to provide members' information to comply with the laws of South Africa or a court order. We only provide such information where there is a legal basis for doing so.

Protection and Security of Personal Information

We take the security of members' information very seriously, and have implemented reasonable technical and operational measures to protect such information from loss, misuse, unauthorised access, disclosure, alteration and destruction, and ensure that all our service providers do so too.

Accuracy of Personal Information

We take reasonable steps to keep personal information up to date. Members may request us to correct personal information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

We will as soon as reasonably practicably correct such personal information unless we are required or entitled under applicable laws to keep the incorrect information and we will inform you that we have done so.

If you would like to correct or update any information, please contact our administrator at

Telephone: +27 11 450-3066

Email Address: Talk2us@gqm.co.za

or contact our Information Officer at +27 11 450-3066

Right to object to the processing of personal information

Members may object at any time to the processing of their personal information on reasonable grounds relating to their situation, unless applicable law provides for such processing.

Members may also object at any time to the processing of their personal information for purposes of direct marketing or the receipt of direct marketing through unsolicited electronic communication.

Retention of Personal Information

We will keep members' personal information for the time period necessary to comply with the registered fund rules and all relevant laws and as set out in this privacy statement. It may be necessary to retain some of the members' personal information beyond this time period if we have received consent for the keeping of the information or if it is required for historical, statistical or research purposes if appropriate safeguards are in place.

If we have to keep information for longer periods than set out above (for example if it cannot be safely destroyed), we will only process it for purposes of storage or for purposes of proof. We will also restrict access to and processing of such information.

Members may request that a fund delete their personal information in our possession or under our control. Members may also request us to destroy or delete a record of their personal information that we are no longer authorised to retain.

A request must be sent to the Information Officer at GQM Fund Administrators (Pty) Ltd using the “Form 2” issued in terms of POPIA for this process. This form can be found in **Annexure A**. We will as soon as reasonably practicable correct, destroy or delete, as the case may be, the relevant information and inform the member that we have done so. Please note that there may be lawful purposes which prohibit us from deleting such information.

International Transfer of personal information

We make use of service providers who may store or process members’ information outside of South Africa. We try to ensure that our service providers only operate in countries with strong data protection laws (for example the United Kingdom or countries within the European Union), or are contractually required to protect personal information in terms of the principles set out in POPIA.

The Information Regulator

Members may complain to the Information Regulator. Members should submit a complaint to the Information Regulator in the prescribed manner and form alleging interference with the protection of their personal information.

The address of the Information Regulator is as follows:

The Information Regulator (South Africa)
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Complaints email: complaints.IR@justice.gov.za

General enquiries email: infoereg@justice.gov.za

Annexure A

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTRUCTION OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

- 1. Affidavits or other documentary evidence as applicable in support of the request may be attached.*
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- 3. Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

☐

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and Surname/ registered name of data subject:	
Unique identifier/ Identity Number:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and Surname/	

registered name of responsible party:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR *DESTRUCTION OR DELETION OR A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at _____ this _____ day of _____ 20_____

Signature of the data subject/designated person