



FAIRHEADS
Benefit Services



THE FAIRHEADS LEGACY TRUST

PRIVACY POLICY

A. Introduction

1. The Protection of Personal Information Act (“POPIA”) requires organisations to take extra steps to protect Beneficiaries’ personal information which they may hold. The Administrator is committed to protecting Beneficiaries’ privacy and ensuring that their personal information is protected.
2. The purpose of this policy is to explain what information the Administrator collects, and why, and how the Administrator uses, discloses and protects that information.
3. This policy applies to personal information collected by the Administrator in connection with the services that they offer.
4. the Administrator collects, stores and processes personal information (including special personal information) about Beneficiaries that may be used in connection with the administration of Beneficiaries’ benefits and other activities conducted by the Administrator from time to time.
5. In particular, the Administrator may collect, process and use Beneficiaries’ personal information:
 - To carry out and manage its business operations;
 - To service Beneficiary Accounts and/or manage the benefits held for Beneficiaries;
 - To provide benefits and services to Beneficiaries and/or other clients;
 - To confirm and verify Beneficiaries’ identities for security purposes;
 - To make payments;
 - To confirm that payments made are being used for the benefit of the Beneficiary;
 - To assess and process instructions, queries and requests received;
 - To confirm that the Beneficiary is in the care of the Guardian / Caregiver;
 - To identify and confirm an authorised third party;
 - To update records with the correct and current information in order to keep in contact with Beneficiaries;
 - For audit, reporting and record keeping purposes;
 - In order to invest the benefit allocated to the Beneficiary correctly;
 - For purposes of archiving emails for disaster recovery purposes, legal reporting obligations, and the like;
 - Any related purpose/s, and
 - Any other legitimate business interests.

B. Information collected

The personal information about a Beneficiary that the Administrator will collect and process from time to time may include but is not limited to the following:

1. Name and surname;
2. Identity number;
3. Contact Information;
4. Banking details;
5. Educational information;
6. Employment status;
7. Health/Medical information (where applicable), and
8. Biometric information such as fingerprints and voice recording, etc. (where necessary).

C. Dealing with personal information

1. In certain cases, the Administrator may send a Beneficiary's personal information to an authorised third party to verify information, for example, verifying the Beneficiary's bank account details with his bank.
2. Where this is necessary, the Administrator will do so if these third parties are subject to the laws that require them to protect the Beneficiary's personal information.
3. A Beneficiary's personal information may be stored for as long as necessary for the purposes for which it is collected or such longer periods as may be required from time to time.
4. A Beneficiary's personal information may be transferred to locations outside of South Africa and may reside outside of South Africa from time to time.
5. A Beneficiary should keep his personal information safe and not disclose it to anyone (including family members, neighbours and friends), as this may result in fraud, identity theft or banking theft.

D. Sharing of personal information

The Administrator will share personal information with companies, organisations or individuals outside of the Administrator, if they have reason to believe that access, use, preservation or disclosure of the information is reasonably necessary to:

1. meet any applicable law, regulation, legal process or enforceable government request;
2. detect, prevent, or otherwise address fraud or security issues, or
3. protect the rights, property or safety of the Administrator, its clients or the public against harm, as required or permitted by law.

E. Privacy rights and who to contact

A Beneficiary has the right to tell the Administrator if he:

1. would like them to correct, update, or if appropriate delete the Beneficiary’s personal information in records;
2. would like a copy of the personal information that they hold about the Beneficiary, or
3. wish to report any misuse of the Beneficiary’s personal information to:

The Administrator’s sharecall no: 0860 102 919
Fax No: 021-4107998
Email: benefitservices@fairheads.com
Postal address: P O Box 4392
CAPE TOWN
8000

F. Safeguarding a Beneficiary’s personal information

1. The Administrator will take all reasonable safety measures to protect a Beneficiary’s personal information.
2. Access to a Beneficiary’s personal information is restricted to prevent unauthorized access. Access to a Beneficiary’s personal information is only permitted to the Administrator’ employees in order to carry out their duties or to authorised third parties who are subject to the laws that require them to protect the Beneficiary’s personal information.

DATED AT ON THIS DAY 2017.

Chairperson / Trustee
Duly authorised to sign on behalf of the Trustees of the Fairheads Legacy Trust