

# FAIRHEADS BENEFIT SERVICES GROUP<sup>1</sup>

## Protection of Personal Information

Fairheads is committed to ensuring the protection of all personal information which the company holds, and to protect all such data. Fairheads is dedicated to safeguarding personal information and to maintain a compliance system which meets data security obligations under the law.

### Processing

“Processing” includes any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

### How the information will be used

- Fairheads collects, discloses, collates, processes and stores the personal information of data subjects in accordance with the 8 POPIA principles.
- Personal information may be used for (but not be limited to) -
  - confirming and verifying the data subject’s identity for security purposes and also to ensure that the existing information on record is accurate and correct;
  - the detection and prevention of fraud, crime, money laundering or other malpractice;
  - audit and record keeping purposes;
  - legal proceedings (if applicable);
  - processing data subject requests;
  - ensuring that Fairheads’ renders services to the data subject lawfully and in compliance with the purpose for which the information was collected;
- Fairheads will keep a record of all personal information and the specific reason(s) that the information has been collected;
- Fairheads will not share (disclose) personal information for any other purpose other than the specified purpose and in instances that are specifically allowed in law.
- Fairheads will take all steps that are reasonably possible to protect the personal information of the data subjects from being compromised.
- Where legislation is silent on data protection and privacy, Fairheads will provide services in accordance with generally accepted principles governing data protection.

### Confidentiality and security

Fairheads has physical, technological and procedural security measures in place to protect the personal information of the data subjects as best as is reasonably possible.

If Fairheads sends personal information outside of the Republic, consent and confirmation in writing from the data subject will be obtained first.



Where it is not reasonably practical to send the information directly to the data subject, then consent is obtained from the data subject to send the information to a 3rd party approved by the trustees. Data subjects are fully apprised of the purpose of processing the personal information.

Prior to the transfer of any information across the Republic’s borders, the Information Officer ensures that the region has data privacy legislation in place or at least privacy standards that comply with South African data privacy requirements.

Fairheads has an Information Security and Systems Policy which sets out how information security incidents will be managed and includes an Incident Response process for dealing with information security incidents.

Fairheads has cybersecurity cover in place.

Personal information of the data subjects may be stored for as long as is necessary for the purposes for which it is collected or such longer periods as may be required from time to time.

CONTACT		
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