



PRIVACY POLICY

1. Introduction and Scope of Privacy Policy

- 1.1 The Actuarial Society of South Africa, with registered head office at Birkdale 1, River Park, Gloucester Road, Mowbray is incorporated under and governed by the laws of the Republic of South Africa.
- 1.2 This Privacy Policy applies to and describes how ASSA collects, receives, records, organises, collates, stores, updates, changes, retrieves, reads, processes, consults, uses and shares ("**Process**" and "**Processing**") your Personal Information (as defined below) as an existing or prospective member of the ASSA.
- 1.3 This Privacy Policy applies to the Processing by us or on our behalf, and our successors-in-title, of Personal Information relating to you and your existing or prospective membership.
- 1.4 We recognise the importance of protecting your privacy in respect of your Personal Information. We strive to ensure that our use of your Personal Information is lawful, reasonable, and relevant to the association's activities, with the goal of improving our services and your experience with us.
- 1.5 In adopting this Privacy Policy, the ASSA wishes to balance its legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your Personal Information. However, we do not guarantee that your Personal Information shall be 100% secure. To the extent allowed by law, the ASSA shall not be liable to you or third party, in respect of the unauthorized disclosure or use of Personal Information.

This paragraph 1.5 limits and excludes obligations, liabilities and legal responsibilities which the ASSA will have towards you. It also limits and excludes, to the extent allowed by applicable laws, your rights and remedies and places various risks, liabilities, obligations and legal responsibilities on you. There are risks associated with sharing Personal Information and allowing the use of Personal Information.

By sharing your Personal Information with us, you expressly consent to and authorise the Processing of your Personal Information, and you accept the foregoing risks.

- 1.6 Where there are reasonable grounds to believe that your Personal Information has been accessed or acquired by any unauthorised person, we will notify you and the Information Regulator which is appointed in terms of Protection of Personal Information Act, 2013 ("POPI"). We will only delay notifying you of the unauthorised access to your Personal Information if a public body responsible for detection, prevention or investigation of offences or the Information Regulator inform us that notifying you will impede a criminal investigation.

2. What is Personal Information?

- 2.1 "**Personal Information**" refers to information about an identifiable person. Your personal information includes information such as, your name and surname, age, date of birth, home address,

postal address, email address or phone number, physical location and profile pictures. The above examples of personal information are not exhaustive. Other information which might be Personal Information includes:

- 2.1.1 **"Device and device event information"**: We may collect information such as your IP address, unique device identifier, the nature of the Access Device which you used to access ASSA's website, the geographic location from which you accessed our site, hardware model and settings, operating system type and version, browser language, system activity, and crashes;
- 2.1.2 **"Log information"**: We may automatically collect and store certain information in server logs when you access our website, which may include your site activity information, such as details of how, when and for how long you accessed the website, what links you went to, what content you accessed, and the amount of time spent on the specific content.
- 2.2 Personal Information does not include information that has been de-identified to the extent that it cannot be re-identified again.
- 2.3 **"Special Personal Information"** refers to Personal Information about race, religion, philosophical beliefs, race or ethnic origin, trade union membership, criminal behaviour, alleged commission of any offence or criminal proceedings in respect thereof, pertaining to you. It also includes Personal Information that you provide us with pertaining to children.

3. **What Personal Information do we Process?**

- 3.1 The types of Personal Information that we Process include information which is necessary for our legitimate business and administrative purposes, as detailed at clause 7 below. The Personal Information we collect in this regard, may include your name, surname, identity number, passport number, birth date, gender, race, age, physical address, postal address, email address, cell phone number, your employment and your academic qualifications. The provision of this Personal Information and Special Personal Information by you, is mandatory.
- 3.2 Please note that failure to provide all mandatory information that ASSA requires from you, will result in your membership being suspended and/or terminated.
- 3.3 We will limit the types of Personal Information we Process to only that to which you expressly consent to the Processing of, and which is necessary for our legitimate business interests and for the purposes of administering your membership with the ASSA.
- 3.4 ASSA will notify you of any Personal Information or Special Personal Information that we require from you that is not mandatory, and the consequences of failure to provide such information.

4. **Your agreement in relation to your Personal Information**

- 4.1 By submitting your Personal Information to us:
 - 4.1.1 you expressly agree to the terms and conditions set out in this Privacy Policy. If you do not agree with this Privacy Policy, please do not continue to apply for membership with us or use our services; and
 - 4.1.2 you expressly agree that we may Process your Personal Information for the purpose of, amongst other things, (i) registering and maintaining your membership with the ASSA, (ii) providing you with access to our services; and (ii) for any of the purposes listed at paragraphs 7 and 8 below.

- 4.2 We reserve the right to vary the terms of this Privacy Policy in accordance with paragraph 13 below. It is your responsibility to familiarise yourself with the most recent version of this Privacy Policy from time to time.

5. When will we Process your Personal Information?

- 5.1 Personal information may be Processed by us in several ways, including, when:
- 5.1.1 you apply to register as a member of the ASSA;
 - 5.1.2 you contact us, by email or telephonically or otherwise, with any queries;
 - 5.1.3 you make use of our services and access our Website;
 - 5.1.4 you register to receive any notifications from us regarding your membership; and
 - 5.1.5 you submit your Personal Information to us for any other reason.
- 5.2 You acknowledge that all Personal Information Processed by us may be stored by us and used for any of the purposes listed in paragraph 7 below. We will store your Personal Information only for a reasonable time to enable us to use if for the purposes described in this Privacy Policy.

6. How we collect your Personal Information

- 6.1 We may collect your Personal Information in three ways, namely:
- 6.1.1 actively from you;
 - 6.1.2 passively from your Access Device when you use the Website; and
 - 6.1.3 passively from our affiliates and third-party service providers.
- 6.2 We require you to submit certain information in order for you to register and/or maintain your membership with the ASSA and we may collect Personal Information from you by asking you specific questions and by permitting you to communicate directly with us, for example via email, feedback forms, site comments and forums.
- ### **6.3 Active collection from you**
- 6.3.1 The Personal Information that we may actively collect from you is set out in paragraph 3.1
- ### **6.4 Passive collection from your Access Device**
- 6.5 We passively collect some of your Personal Information from the Access Device which you use to access and navigate through the website, using various technological means, for instance, using server logs to collect and maintain log information.
- 6.6 We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit the website to distinguish you from other users and to improve our service to you, and make the website more user-friendly, as well as to give you a more personalised experience.
- 6.7 A cookie is a small piece of data (an alphanumeric identifier) which our computer system transfers to your Access Device through your web browser when you visit the website, and which is stored in your web browser. When you visit the website again, the cookie allows the website to recognise your browser. Cookies may store user preferences and other information.
- 6.8 You may disable the use of cookies by configuring your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do so, you may not be able to enjoy all of the features and

functionality of the website.

7. How do we use your Personal Information?

- 7.1 To the extent allowed by law, we may use your Personal Information for the following purposes:
 - 7.1.1 to provide the services to you;
 - 7.1.2 to retain and make available to you any membership information as part of the services;
 - 7.1.3 to verify your membership details and authenticate your identity;
 - 7.1.4 to facilitate any payments by you regarding your membership with the ASSA;
 - 7.1.5 to provide you with any industry related publications and newsletters;
 - 7.1.6 for security, administrative and legal purposes (including enforcing any rights we may have against you in law);
 - 7.1.7 to keep a record of our communications with you and your communications with us;
 - 7.1.8 to inform you about any changes to the website, the association, this Privacy Policy or other changes which are relevant to you;
 - 7.1.9 to comply with any security, administrative and legal purposes;
 - 7.1.10 to compile and use statistical information about you and other members for research, developmental or marketing purposes;
 - 7.1.11 to compile, use and disclose non-personal statistical information about our members;
 - 7.1.12 for helping us in any future dealings with you; and
 - 7.1.13 other activities and/or purposes which are lawful, reasonable and adequate, relevant and not excessive in relation to provision of our services, the associations functions and activities, as well as such other purpose for which it was collected.

8. Sharing of your Personal Information

- 8.1 We will not intentionally disclose, for commercial gain or otherwise, your Personal Information other than as set out in this Privacy Policy, as permitted by applicable law or without your express consent.
- 8.2 The ASSA may share your Personal Information with carefully selected third parties with whom we have entered into contractual arrangements for the purposes of performing any of the activities referred to in paragraph 7.
- 8.3 You expressly agree and consent to your Personal Information being shared under the following circumstances:
 - 8.3.1 to our employees, service providers, contractors, dealers and agents if and to the extent that they need to know that information in order to Process it for us and/or to provide services for or to us, such as hosting, development and administration, technical support and other support services. We will authorise any information Processing done by a third party on our behalf by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions. Such persons may be disciplined, their contracts terminated, or other appropriate action taken if they fail to meet their obligations;
 - 8.3.2 to enforce or apply our membership terms or any other contract between you and us;
 - 8.3.3 to protect our rights, property or safety or that of our members, employees, contractors, dealers and agents and any other third party;

- 8.3.4 to mitigate any actual or reasonably perceived risk to us, our members, employees, service providers, contractors, agents or any other third party;
- 8.3.5 to governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary:
 - 8.3.5.1 to comply with the law or with any legal process;
 - 8.3.5.2 to protect and defend the rights, property or safety of us, our affiliates or our members, employees, contractors and agents or any third party;
 - 8.3.5.3 to detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this Privacy Policy; and/or
 - 8.3.5.4 to protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).
- 8.4 In certain instances, ASSA may transfer Personal Information to third parties in a country outside of South Africa when such transfer of your Personal Information is required for the administration of your membership and/or to facilitate any transfers of funds. Where ASSA transfers your Personal Information to third parties outside of South Africa, we will endeavor to ensure that such third party has measures in place that will adequately protect your Personal Information, in accordance with applicable data protection laws.
- 8.5 ASSA may be required to disclose your Personal Information without your consent when such disclosure is required by law or any order, notice or request of a regulatory authority.

9. Storage of your Personal Information

- 9.1 We store your Personal Information:
 - 9.1.1 on our servers; or
 - 9.1.2 on the servers of our third-party service providers, such as IT systems or hosting service providers. We ensure that we enter into written contracts with our service providers which require them to secure the integrity and confidentiality of Personal Information in their possession by taking appropriate, reasonable technical and organisational measures.

10. Security

- 10.1 We take appropriate reasonable technical and organisational measures to secure the integrity of Personal Information, using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information, and protect your Personal Information from misuse, loss, alteration or destruction.
- 10.2 We also create a back-up of your information for operational and safety purposes.

In this paragraph, you acknowledge that you know, and you accept that technology is not absolutely secure and there is a risk that your Personal Information will not be secure when Processed by means of technology. We do not guarantee that we can keep your Personal Information completely secure. You will not be able to take action against us if you suffer losses or damages in these circumstances.

11. Retention of your Personal Information

- 11.1 We may keep Personal Information for the duration of your membership and/or as long as reasonably necessary, or until you contact us and ask us to destroy the retained Personal Information.
- 11.2 Notwithstanding paragraph 11.1 above and any other provision of this Privacy Policy, we may keep some or all of your Personal Information if and for as long as:
 - 11.2.1 we are required by law, a code of conduct or a contract with you to keep it;
 - 11.2.2 we reasonably need it for lawful purposes related to our functions and activities;
 - 11.2.3 we reasonably need it for evidentiary purposes;
 - 11.2.4 you agree to us keeping it for a specified further period; and/or
 - 11.2.5 it is permitted by law.

12. Keeping your Personal Information updated and correct

- 12.1 Where required by law, we take reasonable steps to ensure that your Personal Information is accurate, complete, not misleading, and up to date.
- 12.2 We also acknowledge that you may have rights of access to, and the right to rectify, your Personal Information, and rights to object to the Processing of your Personal Information in certain circumstances.
- 12.3 You must let us know if any Personal Information we have about you is incorrect, incomplete, misleading or not up to date, by notifying us at the contact details set out in paragraph 16. If you have already registered as a member of the ASSA, you can at a later stage modify some of the Personal Information you have included in your profile by contacting ASSA by email.
- 12.4 Where required by law, we will take reasonable steps to correct or update the relevant information, accordingly, having regard to the purpose for which the Personal Information was collected or used.

13. How can I find out what Personal Information the ASSA holds about me and how can I amend or update my Personal Information?

- 13.1 You have the right to access and correct any and all Personal Information ASSA holds in relation to you. To find out what the Personal Information we have Processed that relates to you and/or to correct or update your Personal Information, please email us at memberservices@actuarialsociety.org.za
- 13.2 You have the right to request ASSA, by email addressed to the above email address, to delete and/or destroy your Personal Information that we hold.
- 13.3 You may request ASSA at any time to stop or object to the Processing any of your Personal Information by us.

14. Changes to this Privacy Policy

- 14.1 From time to time, we may revise this Privacy Policy to reflect changes in the law or changes in our

practices regarding the Processing of Personal Information. If we decide to change this Privacy Policy, the changes will be posted on our Website so that you are always informed of the latest version.

- 14.2 We will not use or disclose Personal Information provided to us pursuant to this Privacy Policy in ways other than the ones described in paragraph 6.5, without informing you and providing you with the opportunity to consent to such modified conditions concerning the use and disclosure of your Personal Information.

15. Governing Law

- 15.1 The contents of this Privacy Policy and the Terms shall be governed by South African law.
- 15.2 If any provision of this Privacy Policy is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced unless a court of competent jurisdiction determines that the substantive purpose of this Privacy Policy is then frustrated, in which case you may contact the ASSA at ceo@actuarialsociety.org.za.

16. Queries

- 16.1 If you have questions about our Privacy Policy, please contact us at memberservices@actuarialsociety.org.za.
- 16.2 You have a right to lodge a complaint to the Information Regulator for any contravention of POPIA at: infoereg@justice.gov.za