



Update on Sanlam Corporate's implementation of the Protection of Personal Information Act, 2013

What is POPIA?

The Protection of Personal Information Act, 4 of 2013 ("POPIA") is an act that, amongst other things, promotes the protection of personal information of all natural and juristic persons ("data subjects") and affords data subjects with certain rights in relation to the processing of their personal information.

POPIA enhances the right to privacy already enshrined in the Constitution and more clearly defines the responsibility of organisations to protect personal and sensitive information in its possession.

How is Sanlam Corporate preparing for POPIA?

POPIA came into effect on 1 July 2020 with a twelve-month grace period granted by the Information Regulator. POPIA aims to protect personal information of data subjects by striking a balance between the right to privacy and the right to access and flow of information. Although the deadline for compliance with POPIA is set for 30 June 2021, Sanlam Corporate ("Sanlam") has already implemented many checks and balances relating to the protection of personal information. We remain committed to:

- ② Ensuring that all personal information is processed in a responsible manner that does not unjustifiably infringe the privacy of any data subjects;
- ② Securing the integrity and confidentiality of personal information in our possession or under our control;
- ② Complying with the obligations of current and/or future legislation, including but not limited to data protection laws.

As the trusted custodian of the personal information of many retirement funds, members, policyholders, and clients – the processing of personal information by Sanlam is informed by the following key principles:

- ② **Accountability:**
Comply and adhere to POPIA
- ② **Processing Limitation:**
Personal information is processed only where a legitimate basis exists, in a fair, lawful, and non-excessive manner.
- ② **Purpose Specification:**
Personal information is only processed for specific and legitimate reasons.
- ② **Further Processing limitation:**
Personal information is not processed for a secondary purpose unless that secondary purpose is compatible with the original purpose or authorised by data protection laws.
- ② **Information Quality:**
Personal information collected and processed must be complete, accurate, up to date and not misleading; considering the purpose for which it is processed.
- ② **Openness:**
Ensure that data subjects are aware of the processing of their personal information, including where it's collected from and how it is used.
- ② **Security Safeguards:**
The integrity and confidentiality of personal information is protected.
- ② **Data Subject Participation:**
Ensure data subjects have access to their personal information (and where justified, can request the deletion or correction of their personal information).

Sanlam Corporate's actions to comply

While there are measures already in place to observe the above listed principles, we are also working to strengthen existing measures through:

- ② Enhancing our existing system processes and data security controls to ensure compliance, within a rapidly changing technology environment
- ② Ensuring the legal justification for the processing of personal information is clearly established
- ② Reviewing all our contracts to ensure compliance with POPIA
- ② Reviewing all our forms, communications, and digital channels to ensure we are aligned with POPIA's requirements
- ② Enhancing privacy notices to inform data subjects how and why their personal information is/will be processed
- ② Enhancing existing processes for data subjects to access and review their personal information held by Sanlam
- ② Enhancing our existing data breach processes
- ② Increasing awareness and training among our staff about the regulatory requirements and enhancing our data privacy culture
- ② Ensuring personal information continues to be stored and destroyed in a secure and confidential manner

Sanlam is confident we will be compliant with POPIA by the deadline of 30 June 2021 due to the privacy culture already embedded in our business and the implementation of the above measures via our POPIA project.

Impact on our clients (members, brokers, intermediaries, employers, funds)

Some of the above actions may require further engagement with our clients, or changes to established processes, forms, and digital channels.

Our POPIA project will ensure that any changes made will follow the proper governance processes and will be aligned with our usual client focussed approach. Where changes directly impact or change the ways in which we engage, we will communicate this change and the reason for the change with the impacted parties.

POPIA is very much a principle-based piece of legislation. It seeks to establish a privacy culture as well as minimum requirements to adhere to.

We will continue to communicate regularly with our clients regarding our progress and welcome any questions that you might have. Please direct these through your usual channels.