

## The Sanlam Umbrella Fund

### NOTICE OF COLLECTION AND PROCESSING OF PERSONAL INFORMATION

POPIA promotes the protection of personal information and all retirement funds must comply with it.

The Sanlam Umbrella Fund and its Sponsor and administrator, Sanlam, takes the protection of the personal information of our members, employers and our fund very seriously. The Fund will only collect, use, and keep personal information if there is a lawful purpose for doing so.

The offering provided by the Fund requires the direct involvement and the processing of personal information by several stakeholders.

Herewith a summary of the requirements that participating employers, CBCs, CFAs and the members of the Joint Forums will be required to comply with.

### The role-players

**The participating employer** is represented by several officers identified in the Confirmation of Acceptance (COA) document. Each one has different functions requiring various levels of access to the Fund Data. They include the HR Officer, Financial Authoriser, Communication Contact Person and the Medical Correspondence Contact Person.

The participating employer is further supported by industry professionals authorised to fulfil certain key support functions. They include:

- ④ The **Contracted Benefit Consultant** (CBC), who is authorised by the participating employer to engage with the Fund, the Fund administrator, the insurers as well as the members of the Fund.
- ④ The **Contracted Financial Adviser** (CFA), who is authorised to provide financial advice to the members who agree to such services.
- ④ The **members of the Joint Forum** established by the participating employer, who are authorised as a committee to monitor and manage service delivery and assist with member communication and support initiatives.

The participation requirements or duties and responsibilities of each role-player of the Sanlam Umbrella Fund are contained in the COA read with the Fund in Detail (TFID). The COA is a summary of the benefit structure selected by the participating employer and is signed by the participating employer. The CBC and CFA also signs this document to confirm their appointment by the participating employer. However, the bulk of the participation requirements are contained in TFID which is amended as required from time to time.

To ensure compliance with the provisions of POPIA, we inserted a new Data Protection chapter into TFID. The participating employer, the CBC, the CFA and each member of the Joint Forum are required to comply with the provisions of POPIA to the extent that they are authorised and required to process personal information as set out in TFID and COA.

## Operators and Authorised Persons

For the purposes of POPIA, the Fund is identified as a “responsible party” and the board of the Fund is responsible for the protection of the Fund Data. In terms of the normal business operations of the Fund, we share information with two important classes of role-players namely, an Operator and an Authorised Person.

An “Operator” includes Service Providers of the Fund such as the administrator and insurer, who Processes Personal Information for the Fund in terms of a contract. The participating employer would also be an Operator, especially when Fund Data is made available by the Fund to the participating employer or one of its officers.

An “Authorised Person” in the context of a commercial umbrella fund, includes the industry professionals contracted by a participating employer and who are identified in the COA and TFID and perform the Services subject to the terms set out therein. These include the CBC, the CFA, and members of the Joint Forum.

## The Data Protection requirements

In terms of the Data Protection chapter in TFID, Operators and Authorised Persons must take all reasonable steps and precautions to preserve the integrity of Fund Data and to prevent any corruption or loss of such data. Employers, CBCs, the CFAs and the members of the Joint Forums are required to study the requirements of the POPIA chapter in TFID, and ensure that they comply with the requirements of the Act.

As industry practices develop, the Fund may issue more specific guidelines to ensure greater efficiency and protection of the Fund Data. To facilitate efficient business processes the fund is in the process of reviewing its processes and procedures - such as the content and structure of the Joint Forum report. The intention is that standard reports and communications will not contain sensitive information and that aspects that will require the sharing of more sensitive information will be forwarded by way of a password protected attachment.

If you have any questions or concerns about the processing of the Fund Data by or on behalf of the Fund please contact us:

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Telephone number: 0861 223 646

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