

PROTECTION OF PERSONAL INFORMATION MANUAL
IN TERMS OF THE
PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 (“POPI ACT”)

MULTILECT MANAGED ANNUITY FUND
MULTILECT RETIREMENT ANNUITY FUND
MULTILECT PRESERVER PENSION FUND
MULTILECT PRESERVER PROVIDENT FUND
MULTILECT UMBRELLA PROVIDENT FUND
MULTILECT UMBRELLA PENSION FUND
(‘the fund’)

1. INTRODUCTION

The Fund carries on business in the retirement fund industry.

The very nature of retirement funds and associated risk benefit schemes necessitates the gathering of certain personal information. Further, information may be gathered to satisfy the requirements of particular legislation and regulations.

The Fund is committed to protecting the privacy of its members and other clients and ensuring that personal information is used in accordance with applicable laws.

This manual sets out how personal information is managed by the Fund.

2. MANAGEMENT AND DELEGATION

A Board manages and oversees the Fund in terms of the Pension Funds Act and in the course of performing its fiduciary duties, may provide personal information of members of the Fund to certain third-parties or request personal information of members of the Fund.

In terms of pensions law, a retirement fund may only be administered by an entity licensed to do so and a Board may therefore delegate and appoint a licensed administrator to administer the Fund. The Board

will provide relevant personal information of members to such administrator or authorize the administrator to request such information to facilitate the efficient administration of the Fund.

It is a statutory requirement that the Fund be audited annually by an external auditor. In conducting the audit, personal information of members is provided to the auditor.

It is a statutory requirement that the Fund be valued at certain intervals. An external valuator conducts the valuation. Personal information of members is provided to the valuator to conduct the valuation of the Fund.

The Fund may insure certain benefits. If applicable, member data will be provided to insurers for valuation of the insured benefit.

The provision of personal information of members to any other third-party, not recorded above, will be for a legitimate cause, connected to the management of the Fund or for the benefit of members.

3. PURPOSE SPECIFIC COLLECTION OF INFORMATION

The POPI Act states that: *“Personal Information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive.”*

For the purposes of this manual, a client is defined as:

- A member of the Fund (or any other individual who has a legitimate interest in the Fund)
- An employer whose employees participate in the Fund or a group scheme. In this instance, the employer will provide and may request certain personal information of employee/s
- A Personal Financial Advisor, who acts on behalf of a client and provides and requests personal information related to such client
- Any organization who acts on behalf of its client and provides and requests information related to its client

The Fund collects and processes personal information for the following reasons:

- Administering a member’s participation in the Fund
- Transferring a member’s benefit in the Fund to another fund
- Processing claims in terms of the rules of the Fund
- Providing underwriting requirements for risk benefits
- Confirming and verifying a member’s or beneficiary’s identity
- Detection and prevention of fraud, crime, money laundering or other malpractice
- Auditing, valuation and record keeping purposes
- Legal and regulatory compliance
- Legal proceedings
- Communication

The above is not an exhaustive list. Other reasons may arise for gathering personal information.

Personal information is used only for the specific purpose for which it was intended. Therefore, the Fund will not, without a client's consent, share information with any other third parties, for any purposes whatsoever, except to satisfy legitimate business processes and legal and regulatory requirements within the context of administering retirement funds and risk benefit schemes.

The type of information collected will depend on the need for which it is collected and will be processed for that purpose only. The Fund will inform a client on the type of information which they are required to provide.

The following are examples of information that may be collected:

- Identity number and copy of ID
- Name and surname
- Address and proof of address
- Salary and proof of salary
- Beneficiaries and nominees and their contact details
- Asset values
- Products invested in a product supplier
- Tax reference numbers and details
- Banking details
- Marital status and proof of marital status, divorce court orders, maintenance court orders
- List of dependants
- Copy of last will and testament

4. LIMITATION OF USE

Personal information will not be used or processed beyond the initial purpose, unless a legal or regulatory requirement or authority requires or allows for further use of personal information.

5. CONDITIONS FOR PROCESSING INFORMATION

Personal information will only be processed if:

- A client consents to the processing
- The processing is necessary for the efficient management and proper administration of the Fund
- A legal obligation to process the information, either directly or indirectly, is imposed by law or regulation or by a legal or regulatory authority
- It protects a legitimate interest of a client
- It promotes a legitimate expectation of a client
- Quotations for a client are required from third party service providers and personal information is required to process a quotation.

6. QUALITY OF INFORMATION

Reasonable steps will be taken to ensure that the information is complete, accurate, not misleading and updated where necessary.

7. OPENNESS

All necessary practical steps will be taken to ensure that a client is aware of the information collected or the source of the information, the purpose for which it was collected and whether the client was obliged to provide the information and the laws, regulations or legitimate practice that governed the collection.

8. SAFEGUARDING OF PERSONAL INFORMATION

It is a requirement to adequately protect all personal information held and to avoid unauthorized access and use thereof.

This is achieved by:

- Controlled access to offices where information is stored
- Password controlled access to systems used to store information
- System back-ups of information and data conducted daily and stored off-site
- Disaster recovery protocols being formally put in place
- Destruction of hard paper data by shredding.

Service Providers will be obliged to protect and safeguard personal information and provide indemnities in the case of breaches.

9. ACCESS TO PERSONAL INFORMATION

Any client has the right to access their personal information. This will be provided free of charge to them.

10. AMENDMENT OF THE MANUAL

This manual shall be amended from time to time to reflect changing practices, new legislation or new regulations. This manual was reviewed on 27 July 2020.

11. INFORMATION OFFICER

The Fund has appointed the following person as the Information Officer:

Name	Barbara Duvenhage
Telephone Number	(011) 274 6160
Physical Address	4 th Floor, Rosebank Corner, 191 Jan Smuts Avenue, Parktown North, 2196
Postal Address	PO Box 3029 Saxonwold 2132
E-mail Address	rosed@multilect.co.za

12. APPROVAL BY THE BOARD

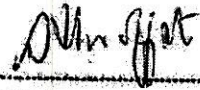
THIS MANUAL HAS BEEN ADOPTED BY THE BOARD OF TRUSTEES

Signed this 27th day of July 2020


.....
CHAIRMAN


.....
TRUSTEE


.....
TRUSTEE


.....
TRUSTEE


.....
PRINCIPAL OFFICER