

# PROTECTION OF PERSONAL INFORMATION POLICY

## 1. **INTRODUCTION**

- 1.1. NTT Motor Investments (Pty) Ltd is an authorised financial services provider who is obliged to comply with the Protection of Personal Information Act ("POPI").
- 1.2. POPI requires NTT Motor Investments to inform their clients as to how their Personal Information is used, disclosed and destroyed.
- 1.3. NTT Motor Investments guarantees its commitment to protecting their client's privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.4. This Policy sets out how NTT Motor Investments deals with their client's Personal Information and in addition for what purpose the said information is used. This Policy is made available on our company website [www.nttgroup.co.za](http://www.nttgroup.co.za) and by request from our offices.
- 1.5. POPI states that "Personal Information may only be processed if - given the purpose for which it is processed - it is adequate, relevant and not excessive.

## 2. **THE PERSONAL INFORMATION COLLECTED**

- 2.1. NTT Motor Investments collects and processes clients Personal Information pertaining to client's finance and insurance needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the client what information they are required to provide us with and what information is optional.

Examples of the Personal Information we collect includes but is not limited to:

- 2.1.1. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, age, physical or mental health, well-being, disability, language and birth of the client/policy holder;
  - 2.1.2. Information relating to the education or the medical, financial, criminal or employment history of the client/policy holder;
  - 2.1.3. Identifying number, symbol, e-mail address, physical address, telephone number, location information or other particular assignment to the client/policy holder;
  - 2.1.4. Biometric information of the client/policy holder;
  - 2.1.5. Correspondence sent by the client/policy holder that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 2.1.6. The views or opinions of another individual about the client/policy holder; and
  - 2.1.7. The name of the client/policy holder if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the client/policy holder;
- 2.2. We have agreements in place with all our products suppliers, insurers and third-party service providers to ensure there is a mutual understanding with regard to the protection of client Personal Information. Our suppliers are subject to the same regulations as we are.
  - 2.3. We may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalised experience in clients' interaction with us.
  - 2.4. For purposes of this Policy, clients include potential and existing clients/policy holders.

### **3. HOW PERSONAL INFORMATION IS USED**

- 3.1. Clients Personal Information will only be used for the purpose for which it was collected and agreed. This may include:
- 3.1.1. Providing products or services to clients and to carry out the transactions requested;
  - 3.1.2. For underwriting purposes;
  - 3.1.3. Assessing and processing claims;
  - 3.1.4. Conducting credit reference searches or verification;
  - 3.1.5. Confirming, verifying and updating client's details;
  - 3.1.6. For purposes of claims history;
  - 3.1.7. For the detection and prevention of fraud, crime, money laundering or other malpractice;
  - 3.1.8. Conducting market or customer satisfaction research;
  - 3.1.9. For audit and record keeping purposes;
  - 3.1.10. In connection with legal proceedings
  - 3.1.11. Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
  - 3.1.12. Providing communications in respect of NTT Motor Investments and regulatory matters that may affect clients; and
  - 3.1.13. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 3.2. In terms of the provisions of POPI, Personal Information may only be processed if certain conditions are met, which are listed below, along with supporting information for NTT Motor Investments' processing of Personal Information:
- 3.2.1. Client consents to the processing – consent only required where the information will be used for something other than the intended use for which the information is supplied by the client;
  - 3.2.2. The processing is necessary – in order to provide the client with the required insurance product;
  - 3.2.3. Processing complies with an obligation imposed by law on NTT Motor Investments;
  - 3.2.4. Processing protects the legitimate interest of the client.
  - 3.2.5. Processing is necessary for pursuing the legitimate interest of NTT Motor Investments or of a third party to whom information is supplied. In order to provide our clients with products we need certain personal information from clients to provide expert products.

### **4. DISCLOSURE OF PERSONAL INFORMATION**

- 4.1. We may disclose clients' Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.
- 4.2. We may also share clients' Personal Information with, and obtain information about clients from third parties for the reasons already discussed in 2.4 above.
- 4.3. We may also disclose a client's information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it is may be necessary to protect our rights.

### **5. SAFEGUARDING CLIENTS' INFORMATION**

- 5.1. It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your personal Information is secure. We do advise that we will hold your information for an indefinite period and that we do not de-identify personal information at any time.

- 5.2. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that your Personal Information is kept secure.
- 5.3. We may need to transfer your Personal Information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with a similar level of protection as afforded to you by us.

## **6. ACCESS AND CORRECTION OF PERSONAL INFORMATION**

6.1. Clients have the right to access the Personal Information we hold about them. Clients also have the right to request us to update, correct or delete their Personal Information on reasonable grounds. Once a client objects to the processing of their Personal Information, NTT Motor Investments may no longer process said Personal Information. We will take all reasonable steps to confirm our clients' identity before providing details of their Personal Information or making changes to their personal Information

6.2. The details of our Information Officer and head office are as follows:

### 6.2.1. Information Officer Details

Anton Geldenhuys

### 6.2.2. Head Office Details

Telephone Number: 0872861070

Postal Address: P.O. Box 35302  
Menlo Park  
0102

Physical Address: 132 Nicolson Street  
Brooklyn  
Pretoria  
0181

Email Address: [ageldenhuys@nttgroup.co.za](mailto:ageldenhuys@nttgroup.co.za)

Website: [www.nttgroup.co.za](http://www.nttgroup.co.za)

## **7. AMENDMENTS TO THIS POLICY**

Amendments to this Policy will take place on an ad hoc basis or at least once a year. Clients are advised to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.

**Document Control**

DOCUMENT TITLE	The Company POPI Policy
FILE NAME AND PATH	
RELEASE DATE	
REVISION DATE	
NUMBER OF PAGES	4
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