

CGS INSURANCE BROKERS

POPI MANUAL

CGS Insurance Brokers has undergone an intensive investigation into how, why and for what reason the financial advisers and supporting staff have requested, processed and filed personal information on our clients.

CGS Insurance Brokers as a responsible party has appointed Desmond George Scherwitz as its information officer. This appointment places responsibility on him to ensure the implementation, maintenance, staff training and dealing with clients' concerns and/or queries.

The type, reason and filing periods for personal information collection is dealt with individually.

Existing clients

Prior to the Protection of Personal Information Act (POPIA) was promulgated, CGS Insurance Brokers collected pertinent personal information from clients to undertake detailed financial needs analyses and other investigations of a financial nature. This information has been filed in each client's folder.

Before recommending any financial product to a client, CGS Insurance Brokers has to complete a needs analysis relevant to the client's requirements. We need certain information of a personal nature from the client in order to complete our mandate. The security of this personal information is the responsibility of CGS Insurance Brokers who must ensure the appropriate level of cyber security.

Most of the personal information that CGS Insurance Brokers require does not fall under the auspices of POPIA. The act of completing an application form for an insurance contract is self-disclosed by the client. Failure to provide this information will render any proposed assurance contract null and void from outset.

All old, outdated personal information in respect of an existing client must be destroyed either by shredding and/or deletion from their folder. Some personal information, such as banking details, are required to be kept for specified periods by acts such as FAIS and FICA.

The provisions contained in the FAIS Act take precedence over the provisions contained in POPIA. For example, all information and documentation in relation to a financial product has to be kept on file for 5 years after the termination of the contract.

Before any personal information can be collected and processed, CGS Insurance Brokers must obtain written permission from the client either by way of a signed hardcopy, signed emailed request or timed email.

Spouses

The only time and amount of personal information that CGS Insurance Brokers can and will gather on a client's spouse is to the extent of recording her/him as a beneficiary on a financial product and/or to admit him/her as an adult dependent on a client's medical aid contract. This will also apply should a client insure his/her spouse's life, in which case the spouse will become a client of CGS Insurance Brokers and the tenets outlined in "**Existing clients**" above will apply.

The relevant personal information will be retained and filed securely for as long as the spouse remains included in any financial contract.

Children

Special consent must be obtained from a client before any personal information regarding children is gathered, used and filed.

The occasions when personal information that CGS Insurance Brokers can and will gather on a client's children is to the extent of:

- Recording her/him as a beneficiary on a financial product.
- Admit her/him as a child dependent on a medical aid contract.
- When an education and/or investment initiative for the child is entered into by the parents and/or other family members.
- When a financial needs analysis on the child/ren's parents is being conducted and the appropriate amount of risk benefits to be recommended must be calculated.
- When a child/ren's parents are drafting a will and the child/ren's details need to be inserted for the purposes of inheriting from the estate.

The relevant personal information will be retained and filed securely for as long as the child/ren remains included in any of the above instances.

Financial Sector Conduct Authority requirements

The Financial Sector Conduct Authority (FSCA) is our controlling authority and all instructions received from them must be actioned.

The security of any personal information on our clients that the FSCA demands will become the joint responsibility with CGS Insurance Brokers.

Visitors

The advisers' working areas are off limits to any and all other people. All discussions with product provider consultants must take place either in the reception area or board room.

Prospective clients

A new/prospective client would be required to provide relevant personal information in order for us to begin the mandate given to us by the new client. Initially, this information may be only the name, identity number, occupation and income. Information required for quoting medical aid will entail more detailed personal information.

It must be remembered that the type and amount of personal information initially required differs for different quotes and advice requested by the new/prospective client.

Should the new client not convert to the status of existing client, all his/her personal information must be destroyed immediately.

The required personal information will be collected and processed by CGS Insurance Brokers by way of a signed hardcopy, signed emailed request or timed email.

Third parties

An appropriate written agreement has to be in place between CGS Insurance Brokers and any third party before a third party can gather and process any person's personal information required by CGS Insurance Brokers.

The FAIS Act demands that CGS Insurance Brokers has to appoint a compliance officer and clients' personal information is made available for the purposes of determining whether the practice complies with the provisions of the act.

Shared personal information

Many of our clients share email addresses with other family members. When dealing with CGS Insurance Brokers and requesting personal information to be emailed to them, this will only be done after the family members have signed a consent document giving CGS Insurance Brokers permission to send such personal information to the shared email address.

Methods of communication

The landline phone is on a wireless platform administered by MFP Office Automation. All people phoning the landline number is informed by a pre-recorded voice note that all phone calls are recorded.

We actively discourage clients sending personal information to us by using WhatsApp. However, our cell phones are password protected and clients' personal information is deleted as soon as it is processed.

All desktop computers and laptops in use by CGS Insurance Brokers are password protected.

We subscribe to Google Suite and our emailing service through Gmail are password protected by a different password for each adviser.

Any emailed marketing, investment, economic or similar communication is accompanied by an opt out option for the recipients to use should they elect not to receive any future communication. If more than one recipient is to receive an email containing this information, it is sent by blind (bcc) mail to protect the recipients' email addresses.

Privacy

CGS Insurance Brokers' Privacy Policy is contained in a separate document and can be viewed on demand.

Electronic equipment

All data, including personal information, processed on our electronic equipment is backed up on a Tuesday evening to our Dropbox account. Every Friday this data is also backed up onto an external hard drive, which is kept offsite.

Marketing

CGS Insurance Brokers does not undertake any form of direct marketing to the broader general public.

The only "marketing" that CGS Insurance Brokers will involve themselves in is bringing certain products to the attention of clients and/or prospective clients. The clients' adviser generally has a good idea that said product will be of interest to their client and/or the adviser had previously recommended the product in question.

Security

The advisers and any support and/or administrative staff have signed confidentiality clauses in their employment contracts. This specifically precludes them from disclosing clients' personal information in any way whatsoever.

Any staff member wilfully disregarding their oath of confidentiality will be charged either civilly and/or criminally according to the breach of information.

Personal information stored in CGS Insurance Brokers' electronic systems is protected according to digital protocols and firewalls built into the various programs such as Dropbox.

Access to all our electronic equipment is protected by way of passwords. This includes documentation emailed to clients.