

## PRIVACY POLICY FOR FPM GROUP HOLDINGS PTY LTD

### Introduction

FPM Group Holdings Pty Ltd and all its' subsidiaries:

- FPM Risk and Wealth Management Pty Ltd
- FPM Short Term Insurance Brokers Pty Ltd
- FPM Fiduciary Services Pty Ltd
- FPM Employee Benefits Pty Ltd
- FPM Asset Management Pty Ltd

(Hereafter called 'we', 'us' and 'our') care about the privacy, security and online safety of our customers' ('you' and 'your') personal information.

We take our responsibility to protect your personal information very seriously. This Privacy Policy explains how we collect, use, share and protect your personal information, as required by the Protection of Personal Information Act (POPIA). Using our services and any disagreements about your privacy are subject to this notice.

As our business grows and changes, we may need to update this Privacy Policy to reflect those changes. If changes affect you personally, we will try and contact you directly because it is important to us that you understand at all times how your personal information is used. Please make sure that we always have your latest contact details.

### 1. The meaning of processing your personal information

To help you understand this Privacy Policy, we include the explanations of the terms 'personal information' and 'process' as used in POPIA:



1.1. Personal Information and Special Personal Information is any information relating to an identifiable living or juristic person. Some examples are: race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

1.2. Process means any operation or activity, whether automated or not, concerning personal information, including: collection, receipt, recording, organisation, collation, storage, updating or modifying, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information. "Processing" will have a similar meaning.

## **2. Why we process your personal information**

We have to process some of your personal information in order to provide you with our products and services, and also as required by insurance, tax and other legislation. For example: When you buy one of our services or products, we collect your name, contact information and payment information to complete the transaction. Your personal information is also gathered through our website and other channels we use to distribute, communicate, and deliver our services. We use your personal information to do the following:

2.1. identify you

2.2. process your requests or instructions

2.3. manage your policy

2.4. follow the laws of South Africa

2.5. detect and prevent fraud

2.6. offer other products and services to you.



Due to the nature of our business, we sometimes use other parties like our service providers and administrators who in turn process your personal information.

### **3. When we share your personal information**

In order to provide our products and services to you, we may share your personal information with other insurers, industry bodies, credit agencies and our service providers.

These are some examples of when we will share your personal information:

- 3.1. When required by any regulatory authority, such as The Financial Sector Conduct Authority (FSCA).
- 3.2. When required by legislation or any legal process.
- 3.3. To protect and defend our rights and property, including our intellectual property.
- 3.4. When you have given us direct permission to do so.

We will never sell your personal information or share it with other parties for their own marketing use unless you have given us direct permission.

### **4. Some information is automatically collected**

When you use any of our digital channels like websites and apps, we receive and store information generated by your activities (usage data gathered by cookies) and other information that is automatically collected from your browser or mobile device. Most of this data is generally not personally identifiable. However, some of this data, either alone or when linked with other information, may allow your identity to be discovered. We treat this combined data as personal information, and we protect it accordingly.



4.1. Cookies are small text files that are created when you view a website. They gather usage data which includes information about the sites you visited, the number of times you visit, the date, time and length of your visit, which products or services you viewed and which areas of the site you visited. We may assign you one or more unique identifiers to help keep track of your future visits.

4.2. Other information automatically collected may include your IP (Internet protocol) address, browser type and version, preferred language, geographic location, wireless or Bluetooth technology on your device, operating system and computer platform.

## **5. Information collected through online advertising**

We use service providers to help us deliver our banner advertisements and other online communications.

To understand which types of offers, promotions and advertising are most appealing to our customers, these service providers may collect and use some of your personal information. This information is aggregated and cannot be linked to you.

5.1. Data aggregation is any process in which information is gathered and expressed in a summary form using specific variables such as age, profession, income and interests.

5.2. These service providers show Our ads on sites on the Internet, and they use the information stored in cookies based on your prior visits to Our website. If you don't want your personal information to be used in this way, you can opt out of the use of cookies, by visiting any of the following sites:

5.2.1. Google at <http://www.google.com/policies/privacy/ads/>



5.2.2. Network Advertising Initiative at

[http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

## **6. How we protect your data**

We take every reasonable precaution to protect your personal information (including information about your activities) from theft, unauthorised access and disruption of services. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centres, systems, and other assets for security vulnerabilities.

However, we cannot guarantee the security of any personal information that you willingly disclose online. Please note that we process and collect your personal information when you use our website, contact us electronically or complete a quotation or application form online. When you use any of our online services, you will be given a username and password. Always keep this information safe and never disclose it to anyone.

## **7. Receiving marketing from us**

We like to keep our customers informed of the latest products and services offered by us and our service providers. When you buy a new product or service from us, we will ask you what your marketing preferences are. If you do not want to receive marketing from us, you can change your preference by contacting us on the contact details on your policy document or on the contact details below.

Note that even if you choose not to receive marketing from us, we may still communicate with you regarding things like security updates, product functionality, responses to service requests and for other transactional or administrative purposes.



## **8. Accessing, changing or removing your personal information**

You may ask us to access, change or remove your personal information from our records. If legislation allows, we may charge an administrative fee, but we will always inform you of any cost before performing your request.

## **9. Final comments**

We reserve the right to amend this Privacy Policy from time to time, and you agree that you will review the terms of this Privacy Policy whenever you visit our website for any such amendments.

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of the Republic of South Africa.

When you do visit our website, and in the process provide us with your personal information, you will be agreeing to the provisions set out above.

You also authorise us to act on the information that you send electronically.

Ensure that you have read and understood the terms and conditions of this Privacy Policy before you provide us with your personal information.

## **10. Contact us**

If you have any questions, or you want to update your personal information or preferences, please contact us on the details below:

**Email:** [info@fpm.co.za](mailto:info@fpm.co.za)

**Tel:** 011-7789300

**Physical Address:** Jameson House, 2 Jameson Avenue, Melrose Estate, 2196

**Postal Address:** PO Box 2062, Houghton, 2041