



Tennant Group Privacy Policy

This policy explains, in detail, the nature of the personal data that we require in order to effectively provide relevant services and how our organisation uses this data (which is collected from you directly or from your employer) to effectively deliver high quality services.

The policy also provides an overview of the way in which data is collected and subsequently stored or destroyed and includes the details of the security measures that we have in place as well as the process to be followed should a breach occur.

This policy aims to promote the purposes of The Protection of Personal Information Act (Act No. 4 of 2013) by ensuring that people are protected from harm through the protection of their personal information and giving effect to the constitutional right to privacy.

This policy applies to you if you are:

- a visitor to our website;
- use our mobile Tennant App;
- a customer; or
- a member on any Fund that we administer or provide brokerage services to.

Your rights under this Privacy Policy include:

1. The right to find out whether we hold your personal information and if we do, you have the right to request access to any of your personal information that we hold;
2. The right to request, where necessary, that we correct, update, destroy or delete your personal information;
3. The right to object, on reasonable grounds, to the processing of your personal information;
4. The right to be notified that your personal information is being collected or that your personal information has been accessed or acquired by an unauthorised person (please refer to our data breach protocol for details).
5. The right to submit a complaint to the Information Regulator if you believe that there has been interference with the protection of your personal information, or that an independent adjudicator who may be resolving your complaint against us, has not decided the matter correctly;
6. Lastly, you have the right to institute civil proceedings against Tennant Group if you believe that we have interfered with the protection of your personal information.

How Do we Comply with the 8 Conditions set out by the Protection of Personal Information Act?

1. **Accountability:** Tennant Group complies with and adheres to POPIA.
2. **Processing Limitation:** Tennant Group only processes personal information when a legitimate basis exists. Information is processed in a fair, lawful, and non-excessive manner.
3. **Purpose specification:** Tennant Group only processes personal information for specific purposes. A list of these purposes is outlined in detail in this policy, which explains the lawful purpose that each department within the Tennant Group may use personal information for.
4. **Further processing limitation:** Tennant Group does not process personal information for a secondary purpose unless that secondary purpose is compatible with the original intended purpose and necessary to action processes outlined in this policy.
5. **Information quality:** Tennant Group makes every reasonable effort to ensure that the personal information that we process is complete, accurate, up to date and in no way misleading. Tennant Group relies on employers and other operators that we engage with to ensure the same when sending us a data subject's personal information.
6. **Openness:** Tennant Group ensures that data subjects are aware of the processing of their personal information, including the source and purpose of its collection, which is all explained in this policy.
7. **Security safeguards:** Tennant Group has made every effort to ensure that the integrity and confidentiality of personal information is protected by taking appropriate, reasonable, technical and organisational measures. Examples of our security measures include data encryption and implementing a "clean desk" policy which all Tennant employees must adhere to
8. **Data subject participation:** Tennant Group ensures that data subjects have access to their personal information upon request. Data subjects may also request the deletion or correction of any of their personal information.

What Personal Data do we collect?

- **Personal Identification information**
 - Full name
 - ID number
- **Employment information**
 - Company that you are employed by
 - Number of years employed
 - Employee number (if applicable)
 - Job title/role
 - Current salary
 - Income tax number
- **Contact information**
 - Cellphone number
 - Email address
 - Residential address

- **Pension Fund information**
 - Current pension fund that you belong to
 - Member category applicable
 - Contribution percentage
 - Risk benefit policy applicable

How do we collect your data?

We collect certain information on registration when you register on our mobile Tennant App. Upon registering on our App, you are informed of the data which needs to be entered and acknowledge you give us permission to make use of the personal information that you provide us with when you register.

If you are a member on one of the funds which we administer or provide brokerage services to; some of the personal information that you have provided to your employer will be provided to us by your employer. We may also request the information directly from you if necessary . This is necessary for us to effectively render consulting and administration services.

When you receive a membership certificate; paid-up membership certificate or when you fill in/update a beneficiary nomination form we will request your consent to collect and use the personal information that you provide us with in accordance with applicable law.

How will we use your data?

Please note that all data received and stored is used for the purpose of providing financial consulting, administration and financial functionality services to our clients.

The data collected is used by various departments and sub-companies within the Tennant Group which all adhere to this privacy policy.

Who do we share your data with?

- Trustees of the Fund on which you are a member
- Your Employer (usually the HR/Payroll Department)
- The Fund's Valuator/Actuary
- Other Retirement Fund/Employee Benefit Administrators (where applicable)
- External Consultants/Brokers of the Fund on which you are a Member (where applicable)
- The Financial Sector Conduct Authority (FSCA)
- Pension Fund Adjudicator (in the case of a complaint having been received)
- Asset/Investment managers
- Auditors
- Insurers and Underwriters
- Medical Aid Schemes & Medical Doctors (when medical underwriting is required for a risk policy)
- Tracing Agents (where necessary)
- South African Revenue Services (SARS)
- Department of Labour

- Compensation Commissioner

How do we store your data?

All data is stored in privately hosted data centers. Physical access to these facilities is restricted. The data is encrypted and access to removable storage has been limited.

How long do we keep your data?

Section 14 of The Protection of Personal Information Act (Act No. 4 of 2013) states that records of personal information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless:

- retention of the record is required or authorised by law;
- the responsible party reasonably requires the record for lawful purposes related to its functions or activities;
- retention of the record is required by a contract between the parties thereto; or
- the data subject or a competent person where the data subject is a child has consented to the retention of the record.

Please note that as a Financial Services Provider, the Tennant Group is legally required (as per the Financial Advisory and Intermediary Services Act 37 of 2002) to keep historical data for a minimum period of 5 years. Furthermore, Tennant Group (as the responsible party) reasonably requires records to be kept for lawful purposes related to our business functions and activities.

Due to our specific line of business and the nature/regulations of the retirement fund management industry in which we operate, we do not delete or destroy any data which we receive. The purpose of retaining all of the personal information which we have on record is to enable us to address any queries received from current or former members as well as the relevant authorities (e.g. the Pension Fund Adjudicator or FSCA), regardless of the number of years which the queries may date back to.

Marketing

Marketing material and company newsletters (e.g. The Tennant Times) are only sent to data subjects who are on our database. The majority of our database consists of our existing and potential clients.

The Tennant Group does attempt to avoid sending unsolicited marketing material to the general public, however, should a data subject wish to no longer receive marketing material from Tennant, they can request to be removed by means of replying to the email informing us that they wish to unsubscribe. As soon as this request is received the data subject will be removed from the relevant mailing list.

How to contact us

Our information officers:

Stephen Tennant, the Managing Director of The Tennant Group, is the appointed Information officer on all divisions on the Tennant Group and all Funds administered by Tennant.

- Email: stephen.tennant@tennant.co.za
- Telephone: (011) 100 8110

Shelley Gaillard, the head of Legal and Compliance at Tennant Life Benefits, is serving as the Deputy Information Officer on all Funds administered by Tennant.

- Email: shelley.gaillard@tennant.co.za
- Telephone: (011) 100 8131

General Contact Numbers:

Tennant Administration Services: (011) 100 8101

Tennant Life Benefits: (011) 100 8100

How to contact the appropriate authorities:

The South African Human Rights Commission PAIA Unit

<i>Address</i>	<i>Private Bag 2700, Houghton, 2041</i>
<i>Email Address</i>	Paia@sahrc.org.za
<i>Contact Number</i>	<i>(011) 484-8300</i>
<i>Facsimile</i>	<i>(011) 484-0582</i>

The Information Regulator (South Africa)

<i>Address</i>	<i>P.O Box 31533, Braamfontein, Johannesburg, 2017</i>
<i>Email Address</i>	inforeq@justice.gov.za OR complaints.IR@justice.gov.za
<i>Contact Number</i>	<i>(010) 023-5207</i>
<i>Website</i>	https://www.justice.gov.za/inforeq/index.html