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Walter Tullis & Associates CC

AUTHORISED FINANCIAL SERVICE PROVIDER

1996/037234/23
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Emalaheni, 1035

Protection of Personal Information

What is the Walter Tullis & Associates' Privacy Statement?

This Statement sets out how your personal information will be used by Walter Tullis & Associates and applies to any information, including personal and special personal information, that you give to Walter Tullis & Associates, or which Walter Tullis & Associates may collect from third parties.

It is important that you read this Statement carefully before submitting any personal information to Walter Tullis & Associates.

By submitting any personal information to Walter Tullis & Associates you provide consent to the processing of your personal information as set out in this Statement.

The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws.

Please do not submit any personal information to Walter Tullis & Associates if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, Walter Tullis & Associates may not be able to provide its products and services to you.

Important Terms:

"Applicable Laws" means local, foreign and international laws, regulations, treaties and codes, for example the Financial Intelligence Centre Act 38 of 2001, the National Credit Act 34 of 2005 and the Protection of Personal Information Act 4 of 2013.

"Walter Tullis & Associates" or "we" means Walter Tullis & Associates CC (Registration Number 1996/037234/23), including any of its subsidiaries.

"Walter Tullis & Associates Affiliate" means a particular entity within Walter Tullis & Associates.

Member: W.T. Tullis
Bachelor of Commerce (Economics)
Diploma in Financial Planning Diploma in Insurance
Certified Financial Planner Fellow of the Institute of Life and Pension Advisers Associate of the Insurance Institute of South Africa
Member: L Tullis
N Dip Electrical Engineering & Computer Systems

"Client" or "you" means any prospective, new or existing client of any Walter Tullis & Associates.

Can this Privacy Statement be amended?

We may amend this Statement from time to time for any of the following reasons:

- to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
- to reflect an actual or expected change in market conditions or general financial services or lending practices;
- to comply with changes to any Applicable Laws;
- to ensure that this Statement is clearer and more favourable to you;
- to rectify any mistake that might be discovered from time to time; and/or
- for any other reason which Walter Tullis & Associates, in its sole discretion, may deem reasonable or necessary.

Any such amendment will come into effect and become part of any agreement you have with Walter Tullis & Associates when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

How does Walter Tullis & Associates handle security and privacy on the website?

We endeavour to keep our website secure at all times. We do however advise you that we cannot guarantee the security of any information provided to us or by us through our website, email, internet or social media. We cannot be held responsible for any loss or unauthorised use or interception of information transmitted via the internet which is beyond our control.

Third party websites

Our website may contain links to other websites outside of the Walter Tullis & Associates. We are not responsible for the content, privacy or security of other websites.

Cookies

Cookies are information that is used to track visitor use of a website and to compile statistical reports on website activity. If you wish to restrict or block cookies, you can do this through your browser settings.

Social Plugins

We use social plugins of social networks such as Facebook, YouTube, LinkedIn, Google+ and Twitter.

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Please note that we have no influence on or control over the extent of the data retrieved by the social networks' interfaces and we can accordingly not be held responsible or liable for any processing or use of personal information transmitted via these social plugins. For information on the purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for the protection of your private sphere, please refer to the data protection information provided by the social network in question.

What personal information does Walter Tullis & Associates collect, and how?

We may collect the following information about you:

- Your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
- Information about your beneficial owner if we are required to do so in terms of Applicable Laws;
- Records of correspondence or enquiries from you or anyone acting on your behalf;
- Details of transactions you carry out with us;
- Details of contracts, sales you carry out with us;
- Your credit history, where you have applied for credit or where we have agreed to provide credit to you;
- Sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints;
- Details of your assurance, insurance and investment policies;
- Details contained in the Financial Needs Analysis, Risk Profile and other linked assurance, insurance and investment details;
- Wills; and
- Any other confidential information provided by the data source or third parties.

If you are under 18 please do not provide us with any personal information unless you have the permission of your parent or legal guardian to do so.

How does Walter Tullis & Associates collect information?

You may provide personal information to us either directly or indirectly, by completing an application for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone, through Walter Tullis & Associates authorised Retailer /Agencies or any other means.

We may receive information about you:

- When you contact us directly, either via our website, web chat service, our Customer Service teams, by email, telephone or via social media, whether to apply for one of our products or services or to make an enquiry or other request;

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- From our network of authorised Walter Tullis & Associates Retailers/Agencies;
- From other Walter Tullis & Associates Entities or entities within, or affiliates of, the Walter Tullis & Associates Group or our carefully selected business partners who provide products and services under one of our brands;
- From third parties, such as credit bureaus, when we do credit checks or decide whether to enter into an agreement with you; or
- Occasionally from other third parties who may lawfully pass your information on to us.
- Telephone calls to us may be recorded and/or monitored for training and quality assessment purposes.

How does Walter Tullis & Associates process and store my information?

Is my information safe with Walter Tullis & Associates?

We continuously implement technical and organisational security measures in order to protect the data we hold against unauthorised access as well as accidental or wilful manipulation, loss or destruction.

It is also important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all login details, including passwords and access codes are kept secure).

How is my personal information processed?

We take the privacy and protection of your personal information very seriously and will only process your personal information in accordance with the Applicable Laws and this Statement.

Accordingly, Walter Tullis & Associates will comply with the relevant data privacy principles or conditions relating to the processing (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) of your personal information set out in Applicable Laws.

Walter Tullis & Associates SA employees attend regular data protection training. Your personal information will only be processed for purposes set out in this Statement or if we are entitled to do so under Applicable Laws.

Can Walter Tullis & Associates retain my information?

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to

retain it for longer for a lawful purpose (for example, for the purposes of complaints handling, legal processes and proceedings).

What rights do I have regarding my personal information?

You have the right to contact relevant credit bureau(x), to have the credit record(s) disclosed and to correct any inaccurate information.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out in our [PAIA Manual](#).

You have a right to object on reasonable grounds to the processing of your personal information where we claim such processing is necessary to pursue our legitimate interests, your legitimate interests or the legitimate interests of a third party to which the information is supplied. We may then stop such processing, unless Applicable Laws provide for such processing.

Can information be shared with third parties?

Can Walter Tullis & Associates share my information?

We may share your personal information with:

- Other Walter Tullis & Associates entities, our agents and sub-contractors, third parties who process personal information on our behalf and Walter Tullis & Associates companies, or affiliates, in South Africa and in other countries;
- Our authorised Walter Tullis & Associates Retailers/Agencies;
- Our carefully selected business partners, including those who provide products and services under any of our brands;
- Our service providers and agents who perform services on our behalf;
- Any person who has agreed or is considering to provide security for your indebtedness, including any surety, guarantor, potential surety or potential guarantor under any finance document who requests such information to evaluate any actual or potential liability under such suretyship or guarantee;
- A prospective buyer or seller of any of our businesses, assets or debt;
- A person who acquires substantially all of the assets of a Walter Tullis & Associates Affiliate;
- Any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Walter Tullis & Associates, its clients or other third parties;
- Other lenders or banks, collection agencies, lawyers, accountants, auditors, regulators and law enforcement agencies, to the extent necessary to protect, preserve or enforce Walter Tullis & Associates 's rights and interests in respect of any agreement or any finance document or to respond to any legal enquiry or to comply with any regulatory obligation;

- Any other Walter Tullis & Associates Affiliate and any assignee or potential assignee of Walter Tullis & Associates' rights and/or obligations under any agreement or any person with whom any Walter Tullis & Associates may otherwise consider entering into a contract in relation to a relevant finance document; and
- Your agent or any other person acting on your behalf, an independent financial advisor or an introducer, informing them of the outcome of your application and whether we have agreed to provide you with the product, service or offering you have applied for. We may also disclose information about you and your relationship with Walter Tullis & Associates to such person throughout the term of that relationship;
- Other lenders or banks, collection agencies, lawyers, accountants, auditors, or any supplier/retailer who requires a cession or has/requires an interest in any insurance product or policy you have on an insured life/asset (for example cession on policies, insurance confirmations, insurance schedules and insurance summaries).

We may disclose your personal information to these third parties for any purpose permitted in terms of Applicable Laws, including to-

- assess and monitor any of your applications for Walter Tullis & Associates' products or services, including the risk involved to comply with Applicable Laws;
- determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications;
- expedite applications;
- make decisions regarding the cover requirements & risk profiles;
- keep your usual contact within Walter Tullis & Associates informed of the progress of any new applications for new services or products, and the other way around;
- have a better understanding of your circumstances and needs to provide and improve Walter Tullis & Associates' products and services;
- comply with Applicable Laws requiring Walter Tullis & Associates and/or any third party to collect personal information;
- identify whether other financial institutions have received payment from you due to us;
- detect and report fraud and criminal activities, to identify the proceeds of unlawful activities and to combat crime;
- use for marketing purposes; and
- make reports to any regulator or supervisory authority, including those in foreign jurisdictions, if Walter Tullis & Associates SA is required to do so in terms of Applicable Laws.

We do not share your personal information with any third parties, except if:

- we are legally permitted or obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings;
- we are selling one or more of our businesses to someone to whom we may transfer our rights under any agreement we have with you;

- Necessary for purposes of preventing fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- it is required in order to provide or manage any information, products and/or services to you;
- needed to help us improve the quality of our products and services.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out herein. We may, however, not be able to provide products or services to you if such disclosure is necessary.

Can I share information with Walter Tullis & Associates on third Parties?

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us and identify us. We will process their personal information in accordance with this Statement. If you give us information on behalf of someone else, you confirm to us that you have their permission to do so and that they are aware of the contents of this Statement and do not have any objection to us processing their information in accordance with this Statement.

What is my personal information used for?

Subject to Applicable Laws, we may use your personal information for a variety of purposes, including:

Legal Contractual

- Legal or contractual purposes;
- To manage your credit agreement or other contractual arrangement or relationship;
- To detect and prevent fraud and money laundering and/or in the interest of security and crime prevention;
- To conduct sanction party list and politically exposed person screening against any relevant list which Walter Tullis & Associates may in its sole discretion determine;
- To verify your identity;
- To comply with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;

Marketing & Data Analytics/Enrichment

- Data analytics and/or enrichment;
- To carry out analysis and customer profiling;
- To identify other products and services which might be of interest to you;
- To assess and deal with complaints and requests;

- To conduct market research and provide you with information about Walter Tullis & Associates' products or services from time to time via email, telephone or other means (for example, events).
- Where you have unsubscribed from certain direct marketing communications, for the purposes of ensuring that we do not send such direct marketing to you again.

Financial

- To help determine cover requirements;
- Review Risk exposure;
- To provide products and advice on insurance, assurance, investments or other financial risk products;

Quotes & Application

- Your information will have to be shared with Service Providers in order to obtain quotes; and
- Issue policies or investments as authorized.

Operational & Customer Service

- To obtain a single view of a customer for all of Walter Tullis & Associates;
- To improve your customer experience;
- To help us improve the quality of our products and services;
- To provide you with the services, products or offerings you have requested, and to notify you about important changes to these services, products or offerings;
- To comply with your instructions or requests;
- For operational, marketing, auditing, legal and record-keeping requirements;
- To transfer or process your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites. We will however only transfer your personal information across South African borders if the relevant situation requires trans-border processing and will do so only in accordance with Applicable Laws.
- To record, access and/or monitor your telephone calls and electronic communications to/with Walter Tullis & Associates SA, including all forms of notifications, correspondence received by or sent from Walter Tullis & Associates (including its employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention and to comply with Applicable Laws;
- In circumstances where we wish to protect our legitimate interest, where:
 - we have exercised our right to terminate the agreement through a proper legal process as a result of default in respect of any of your obligations under an agreement;
 - or a court order has been granted in our favour;
- To disclose your personal information to third parties, including other Walter Tullis & Associates Entities, for reasons set out in this Statement or where it is not unlawful to do so;

- To conduct surveys; and
- To improve or evaluate the effectiveness of Walter Tullis & Associates' business or products, services or offerings.

What should I do if my personal details change?

We strive to maintain the integrity and accuracy of your personal information at all times. You are responsible for informing us of any change in your details, such as a change of address. You have a right to ask us to correct any inaccuracies in the information we hold about you.

If your personal information changes at any time or our records appear to be incorrect, please inform us immediately so that we may update or correct our records accordingly. If you fail to keep your information updated, or if your information is incorrect, Walter Tullis & Associates may limit the products and services offered to you or elect not to provide any of these to you.

Can Walter Tullis & Associates contact me?

We (and these other parties) may contact you by post, telephone, e-mail, SMS and other electronic means, to inform you about services, products and offerings available from Walter Tullis & Associates, specific Walter Tullis & Associates Entities, the Walter Tullis & Associates Group, or selected third parties, which we believe may be of interest to you, unless you have unsubscribed from receiving such communications. We will only send you marketing communications if we are entitled to do so under Applicable Laws.

Your participation is completely voluntary. You may unsubscribe or opt out from receiving such communications from Walter Tullis & Associates Entities by accessing your online customer profile by making use of the "Unsubscribe" option available on the relevant communication or by contacting us at any time.

You may also contact us utilising the contact details set out in this Statement if you have previously asked not to receive marketing communications from us but would now like to hear from us with news on Walter Tullis & Associates Group vehicles and other associated products and services.

How do I contact Walter Tullis & Associates?

You can contact us through the following channels:

Email: wta@tullis.co.za;

Telephone: Customer Contact Centre at **013 690 1600**; or Information Officer: Walter Tullis, E-mail address tulliswt@iafrica.com.

Our address: 3D Bureau du Paul, 9 Corridor Crescent, N4 Business Park, Emalahleni.

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Should you believe that Walter Tullis & Associates has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with Walter Tullis & Associates. If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

- E-Mail: infoereg@justice.gov.za

Can I request information that Walter Tullis & Associates has about me?

You may request details of personal information which we hold about you under the Promotion of Access to Information Act 2 of 2000 ("PAIA"). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Walter Tullis & Associates, please review our PAIA Manual.
