

PRIVACY POLICY STATEMENT

Respecting and protecting your Personal Information is very important to us. It is also a Constitutional right, legal, and good business practice requirement, which we take very seriously.

In line with the 8 Conditions in the Protection of Personal Information Act, 4 of 2013 (the Act), Penryn

- Accept joint responsibility and accountability with you to responsibly manage and protect your Personal Information when providing our services and solutions to you;
- Undertake to receive, only from you, and process the Personal Information that is necessary for the purpose to assist you with your required solutions, conclude the necessarily related agreements and consider the legitimate legal interests of everyone concerned, as required by the Act and to respect your right to withdraw your consent for the processing of your Personal Information;
- Undertake to only use your Personal Information for the purpose required to assist you or provide solutions to you;
- Undertake not to share or further process your Personal Information with anyone if not required for assisting you with your solutions or by the law;
- Undertake to be open and transparent and notify you as and when required by law regarding why and how your Personal Information needs to be collected;
- Undertake to safeguard and protect your Personal Information in our possession;
- Undertake to freely confirm what Personal Information Penryn have, to update and correct the Personal Information, and to keep it for no longer than legally required.

Penryn or the companies who provide or assist with the solutions your required need to collect, use, and keep your Personal Information as prescribed by relevant laws and regulations and for reasons such as:

- To share with and provide relevant products or services to you, to carry out the transaction you requested, and to maintain our relationship;
- To respond to your queries;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For insurance underwriting purposes;
- To assess and process claims;
- To conduct credit reference searches or verification, only if you authorise this or if it's a requirement to provide your solutions to you;
- For operational purposes required to assist you with the solutions you require;
- For audit and record-keeping purposes;
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

Penryn may need to share your Personal Information and/or utilise software or online platforms to enter and process your information for an application, claims, or business management purposes. This will only be done in strict adherence to the requirements of the Act.

Your Personal Information is defined by the Protection of Personal Information Act (the Act) as:

“means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person”.

Penryn and the companies providing the solutions to you may use “cookies” on our and their websites. They enable us and them to improve your future visits to our site as well as provide you with a more user-friendly experience. Penryn and their [Cookie Policy](#) can be found on the websites.

How we secure your personal information

- We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:
 - keeping our systems secure (like monitoring access and usage);
 - storing our records securely.
 - controlling the access to our buildings, systems and/or records; and
 - safely destroying or deleting records.
 - Ensure compliance with best practice standards.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it; and / or
- we require it for our lawful business purposes.

Take note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

Your duties and rights about the personal information we have about you:

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

Please contact our Information Officer to give effect to any of the below rights.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information; and
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You must inform us of your request in writing. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You must inform us of any objection in writing.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

Any additional information or concerns can be found and raised with the Information Regulator, who can be contacted as shared below, but please feel free to contact us first to discuss any questions or concerns you may have:

Website: <https://www.justice.gov.za/infoereg/>

Tel: 012 406 4818

Email: infoereg@justice.gov.za

How can you get in touch with us?

For any queries in relation to this letter or our processing of your personal information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Name: Michael Maluveya Eisen
Contact Number: 0137589000
Email Address: humanresources@penryn.co.za
Physical Address: Boschrand Farm
R40 between Nelspruit and Whiteriver
Nelspruit, 1200