

Practical implementation of POPIA at Glacier

The Protection of Personal Information Act, 2013 (POPIA), stipulates how responsible parties may process personal information of data subjects (natural or juristic persons) to ensure that every person's constitutional right to privacy is upheld through the protection of their personal information.

Glacier as responsible party

Glacier acts as a responsible party when we process (handle) any personal information, and we have to ensure that we do so lawfully and in a reasonable manner that does not infringe on the privacy of the data subject (which, in Glacier's case, is mostly clients or prospective clients and includes their beneficiaries and dependants, where applicable).

Practical implementation Various additions have been made to our systems, forms and documents, and some new processes have been introduced:

POPIA disclosure added to online systems, documents and forms

We have added POPIA-related disclosures to our forms and other relevant documentation, as well as to our online systems and websites. These disclosures also contain a link to our [privacy policy](#).

A new "How we protect your personal information" section was added to the terms and conditions on our application forms, our quotes, and certain maintenance forms, as well as to investment confirmations and statements.

'Compress document' tool added to intermediary web

A tool called *Compress Document* was added to the intermediary web to enable the compression of large pdf documents. This tool is a POPIA compliant solution to compress pdf documents when submitting them via the Investment Hub or email.

Email communication guidelines for intermediaries

The Sanlam group provides certain recommendations for email correspondence between us and intermediaries.

- Intermediaries should ensure that their email server is set to the default setting for Microsoft Exchange and other large-scale email servers, namely TLS (Transport Layer Security). This ensures that emails are secure and safe from access while being transmitted.
- Encryption of attachments is discouraged, as it will lead to significant delays in processing.

Data subject participation process

A specific process has been put in place for people to exercise their right to enquire about the personal information we hold of them. They have to be referred to the **Sanlam Client Care Centre** or **Sanlam's website** to complete a form online.

It is important to note this is a **special process**, which clients could follow should they have good reason to believe that we are not processing their information lawfully and in line with POPIA. The objective of the process is not a "quick check to see" and it takes about 30 days to receive a response.

New PI data breach process

Intermediaries have to notify Sanlam of data breaches by emailing POPIABreach@Sanlam.co.za

A data breach includes when personal information is lost, damaged or unlawfully destroyed; or accessed, or processed unlawfully.

New 'Opt out of direct marketing' process

Clients have the right to object to the processing of their PI for direct marketing and withdraw consent that was previously given for direct marketing.

Clients should be referred to the **Sanlam Client Care Centre** on 021 916 5000 or 0860 SANLAM (0860 726 526). Opting out at Sanlam will mean opting out of direct marketing from the entire **Sanlam Group**.

A comprehensive document about these changes is available [here](#).

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