

RCC Compliance Consulting
Company Registration Number: 2023/604917/07
Practice Number: 7870
Tel: 010 634 1800
Cell: 076 962 2655
Email: compliance@rccaudit.co.za

Physical Address:
Cnr Cradock & Warren Rd
Lyttelton, Centurion, 0157



RCC COMPLIANCE CONSULTING

PRIVACY STATEMENT

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1. INTRODUCTION

At RCC Compliance Consulting (Pty) Ltd (“RCC Compliance Consulting”), we take the protection of your personal information seriously and are committed to upholding your right to privacy. As a registered Compliance Practice, we are fully compliant with the Protection of Personal Information Act 4 of 2013 (POPIA), Electronic Communications and Transactions Act (ECTA), Act 25 of 2002, Promotion of Access to Information Act (PAIA), Act 2 of 2000 and the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS).

In accordance with Section 18 of POPIA, this statement outlines how we collect, process, store, and protect your personal data when you interact with us or make use of our various compliance services. We are also committed to the principles of treating clients fairly (TCF), as guided by the Financial Sector Conduct Authority (FSCA).

Our internal practices align with Section 19 to 22 of POPIA, which require responsible parties to implement appropriate security safeguards to protect personal information against loss, damage, or unauthorised access. Furthermore, in line with Section 3A of the General Code of Conduct under FAIS, we ensure that all representations made to clients are honest, accurate, and not misleading, especially in the collection and use of personal information for insurance-related services.

2. INFORMATION WE COLLECT

We collect personal information directly from you when you interact with us whether through in-person meetings, online platforms, telephone conversations, or email communication. The types of information we may collect include your full name, ID number, date of birth, contact information, residential and postal address, income and employment details, banking information for premium collection, as well as details of your beneficiaries. We also collect records of your communication with us, such as call recordings and emails, for purposes of compliance and service improvement. In some cases, we may receive your information from authorised third parties such as brokers, or from public sources in line with lawful processing requirements under Section 11 of POPIA.

3. PURPOSE OF COLLECTION AND USE

Your personal information is collected for specific, explicitly defined, and lawful purposes in accordance with Section 13 of POPIA. These purposes include evaluating your eligibility for a registration as an FSP’s representative, Key Individual application, FSP license application, NCR license application, processing and managing your application. Additionally, we are

legally required to process certain personal data to comply with anti-money laundering (AML), financial reporting, and tax obligations. We may also use your information to prevent fraud, to conduct internal audits, and to communicate product updates or service offerings, with your consent. Marketing communications will only be sent in accordance with Section 69 of POPIA, which regulates the use of personal information for direct marketing by means of electronic communication.

4. SHARING OF INFORMATION

Your personal information may be shared with third parties who assist us in delivering our services, such as the FSCA, NCR, FIC, Information Regulator and product providers. Any sharing of personal information is done in strict compliance with Section 20 of POPIA, and all third parties are contractually obligated to maintain confidentiality and to implement appropriate data security measures. Under no circumstances do we sell or lease your personal information to external parties.

5. SECURITY OF PERSONAL INFORMATION

In line with Section 19 of POPIA, we have implemented reasonable and appropriate technical and organisational safeguards to ensure the confidentiality, integrity, and availability of the personal information we process. These include encrypted servers, access controls, firewalls, secure storage environments, and strict employee confidentiality agreements. All systems are monitored and updated regularly to protect against breaches, data loss, or unauthorised access. We also ensure that third-party service providers meet our security requirements and are regularly audited for compliance. Nonetheless, clients are encouraged to remain vigilant, particularly when disclosing personal data through digital platforms.

6. YOUR RIGHTS AS A DATA SUBJECT

In terms of Chapter 3 of POPIA (Sections 5 to 23), you have the right to access, correct, or update the personal information we hold about you. You may request confirmation of whether we hold personal information about you (Section 23) and may request a copy of such records. You may also object to the processing of your information under certain circumstances as provided in Section 11(3) and request that inaccurate or outdated information be corrected or deleted in accordance with Section 24. Where consent has been provided for marketing or other optional processing activities, you have the right to withdraw that consent at any time, as stipulated under Section 69. If you believe your data privacy rights have been violated, you may lodge a complaint with the Information Regulator, whose contact details are available on their official website.

7. DATA RETENTION

We will retain your personal information for as long as it is necessary to fulfil the purposes for which it was collected, or as required by applicable financial and tax legislation. In accordance with Section 14 of POPIA and recordkeeping obligations under FAIS, we retain certain policyholder data for at least five years from the date of cancellation or termination of the financial product. Once this retention period lapses and the data is no longer required, we will securely destroy or de-identify it in compliance with POPIA. Retention practices are regularly reviewed to ensure they remain compliant with changes in legal requirements and operational needs.

8. MARKETING COMMUNICATION

We may use your personal information to contact you with promotional offers or information about products that we believe may be beneficial to you. This will only be done with your explicit consent, in accordance with Section 69(1) of POPIA. All marketing messages will include a simple method for you to opt out, and we will honour such requests promptly. If you previously consented to marketing but now wish to withdraw your consent, you may contact us at any time, and your details will be removed from our marketing database. We respect your communication preferences and are committed to responsible marketing practices.

9. UPDATES TO THIS PRIVACY STATEMENT

We reserve the right to amend this Privacy Statement from time to time in line with changes in legislation, business practices, or technological developments. All changes will be published on our website or communicated directly where appropriate. We encourage clients to review the statement periodically to remain informed about how their personal information is being used and protected. Continued use of our services after updates have been made will constitute your acceptance of the revised statement. If substantial changes are made, we may seek renewed consent as required under Section 18(1)(d) of POPIA.

10. CONTACT US

Should you have any questions about this Privacy Statement or wish to exercise any of your rights under POPIA, you are welcome to contact our Information Officer, who is responsible for overseeing compliance with data protection laws. You may contact us via:

Information Officer: Thanzi Matsheketsheke

Email: compliance@rccaudit.co.za

Phone: 076 962 2655 / 010 634 1800

Physical Address: Cnr Cradock and Warren Rd, Lyttleton Manor, Centurion, 0157

Website: www.rccaudit.co.za

If you are not satisfied with the way we handle your request or concern, you have the right to lodge a complaint with the Information Regulator at:

Website: <https://www.inforegulator.org.za>

Email: complaints.IR@justice.gov.za