

Quill Consulting Services (Pty) Ltd |

Privacy Notice

1 INTRODUCTION

1.1 Quill Consulting Services (Pty) Ltd located at 1st Floor, Roland Garros, The Campus, 57 Sloane Street, Bryanston 2191 ("QCS") respects and acknowledges the importance of protecting your Personal Information.

1.2 This Privacy Notice sets out how QCS will process your Personal Information in the ordinary course of conducting its business and it also applies to QCS's website (www.quillcs.co.za).

2 WHAT PERSONAL INFORMATION WE COLLECT

2.1 *User Information*

2.1.1 QCS collects the information that you voluntarily submit, including the following:

- Personal Information – your full names, sex, gender, address, smoking status, highest education, identity number or passport number, employment number monthly income, banking details, email address, telephone number, cellular number, language preference, medical or health information (where applicable);
- Financial Information – such as information relating to your income, expenses, assets, liabilities, investments, retirement and other financial provisions that may be utilised when providing financial advice and intermediary services;
- Insurance History – including details about your existing policies that you hold and the institutions that hold these policies;
- Health information such as smoker status or medical-related issues relevant to issuing a policy and determining the premiums to be charged;
- Distribution of your Estate – special bequests and residue;
- Last wishes (optional);
- Organ donor registration (optional);
- Nominations for Executors, Trustees, and Guardians;
- Testamentary drafting notes (optional);
- Nomination of Beneficiaries, including Children's details (if applicable);
- Intermediary and fulfilment preferences;
- Asset and liability values that make up the total value of your Estate;
- Online information - for example, cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.
- Any other information required by QCS, its authorised agents and consultants, suppliers, insurers, or third parties in order to provide you with intermediated estate and financial services.

2.1.2 We may collect information that you submit when you contact customer support or provide feedback.

2.1.3 We acknowledge that information about your health is special personal information as defined in the Protection of Personal Information Act. Please be assured that we will use that

information strictly in accordance with applicable laws and for insurance purposes only to the extent that it is necessary for us to formulate the terms of the insurance policies, dealing with changes to any policy and/or dealing with claims.

2.2 *Information from other sources.*

This may include:

- users providing your information in connection with referral programmes;
- users requesting services for you or on your behalf;
- publicly available sources;
- data aggregators;
- Credit bureaus;
- Fraud prevention agencies;
- marketing service providers.

3 HOW QCS USES YOUR PERSONAL INFORMATION

3.1 *Providing services and features*

3.1.1 Your information will only be used for the purposes for which it was intended. These may include:

- financial needs analysis;
- issuing a or providing a product or service and generally carrying out the transaction requested;
- managing and servicing your policy;
- processing your requests or instructions;
- Underwriting;
- to undertake credit reference searches and/or verification;
- assessing and processing claims;
- claims history and reporting;
- detection of fraud, crime, money laundering or other malpractice;
- conducting market or policyholder research and ensuring that the product and services remain relevant;
- provide you with information about our products and services from time to time via email, telephone or other means;
- auditing and record keeping;
- legal proceedings; and
- complying with legal and regulatory requirements.

3.2 *Safety and security*

We may use your data to help maintain the security of our services.

3.3 *Customer support*

QCS uses the information we collect to assist you when you contact customer support, including but not limited to:

- investigate and address your concerns;
- managing and servicing your policy;
- monitor and improve our response.

3.4 *Communications from QCS*

3.4.1 Subject to applicable laws, QCS may use information to communicate with you, regarding marketing materials.

3.4.2 QCS may also use the information to promote and provide you with relevant adverts and content about our services.

4 HOW WE COLLECT PERSONAL INFORMATION

4.1 We may collect your Personal Information in a variety of ways when you interact with us, including:

- a completed Application Form that gets completed and signed by you for processing;
- when you engage with us to solicit our products or services;
- when we respond to your enquiries and requests;
- as a result of communications between you and financial advisors or representatives;
- when we obtain feedback from you about our services; and
- when you access and use our websites.

4.2 We may also collect your Personal Information from third-party sources and third parties including public databases, business partners with whom we offer co-branded services or engage in joint marketing activities, and third parties that provide list enhancement or similar services, to the extent that this is permitted by applicable law.

4.3 Where you provide Personal Information to us about third party individuals (e.g., information about your spouse, civil partner, child(ren), dependants or emergency contacts), where appropriate, you should ensure that such individuals are made aware of how their Personal Information will be used by us, by providing them with a copy of this Privacy Notice or otherwise making them aware of the manner in which we will use their Personal information

5 LEGAL GROUNDS FOR PROCESSING

5.1 By virtue of your engagement with QCS, you acknowledge that QCS shall have the right to process Personal Information provided to QCS by you or some other party, to enable QCS to fulfil its legal and contractual obligations.

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- 5.2 Personal Information may also be used based on the legitimate interests pursued by QCS or its affiliates, except where such interests are overridden by your interests or fundamental rights and freedoms which require the protection of your Personal Information.
- 5.3 In the event that you refuse to permit QCS to utilise your Personal Information in the manner described in this Privacy Notice, QCS will not be in a position to offer you use of its services.
- 5.4 QCS may share your information other than as described in this notice if we notify you and you consent to the sharing. In circumstances where you give us your consent for a specific purpose, you are entitled to withdraw that consent at any time. Be aware that in the event that you withdraw your consent, this will not affect any processing of your Personal Information that took place prior to such withdrawal and it will not affect the processing of your Personal Information where there are other lawful grounds for processing your Personal Information.
- 5.5 You are responsible for informing QCS if your information changes.

6 TRANSFERS TO THIRD PARTIES

QCS may share the information we collect with:

6.1 *QCS subsidiaries and affiliates*

We share information with our shareholders and affiliates to help provide our services, for governance and regulatory requirements or conduct data processing on our behalf.

6.2 *QCS service providers and business partners*

QCS may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

- payment processors and facilitators;
- cloud storage providers;
- marketing partners and marketing platform providers;
- data analytics providers;
- research partners;
- vendors that assist QCS to enhance the safety and security of its business activities;
- consultants, lawyers, accountants and other professional service providers;
- successors of the business, where QCS or the services are sold to, acquired by, or merged with another organisation, in whole or in part. Where Personal Information is shared in these circumstances it will continue to be Processed in accordance with this Privacy Notice; and
- insurance and financing partners.

6.3 *Other entities for legal reasons or in the event of a dispute*

QCS may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

7 CROSS-BORDER DATA TRANSFERS

Your data may be subject to cross-border data transfers. When making cross-border transfers of Personal Information, QCS will ensure that the third-party processor (operator) is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection for the lawful processing of your Personal Information and includes provisions relating to the further transfer of Personal Information from the recipient to third parties who are in a foreign country. Where applicable, QCS will contractually commit to employ suitable technical and organisational measures to protect your Personal Information as required by the applicable law (hereinafter referred to as “**Supplier Data Processing Agreements**”), as well as other suitable safeguards recognised by Data Protection Laws.

8 RETENTION

- 8.1 QCS requires your information in order to refer financial products and provide our services. We retain such information for as long as you maintain your contracted relationship with us.
- 8.2 Once information is no longer necessary to provide QCS services, enable customer support, enhance the user experience or for other operational purposes, QCS takes steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection.
- 8.3 QCS may also retain certain information, if necessary, for its legitimate business interests, such as fraud prevention and enhancing your safety and security.

9 SECURITY OF YOUR PERSONAL INFORMATION

- 9.1 QCS is committed to protecting your Personal Information from misuse, loss, unauthorised access, modification or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your Personal Information do the same.
- 9.2 Whilst QCS makes every effort to secure its website, you should note that the internet is not completely secure; thus, when you submit or post Personal Information online, you should be aware that QCS cannot guarantee the security of any Personal Information that you submit or post online.

10 WEBSITE

- 10.1 By using the QCS website, you accept that your Personal Information may be disclosed to QCS employees, suppliers and marketing agents where this information is necessary for them to offer, evaluate and enhance products and services offered on the QCS website (www.quillcs.co.za/).
- 10.2 QCS uses cookies on its website which are required for certain features to work efficiently. We recommend that you allow cookies to enjoy the full functionality of our website, however, you can

adjust the settings and options on your browser to disable or enable cookies or visit www.aboutcookies.org for detailed information about managing cookies on various browsers.

11 DIRECT MARKETING

- 11.1 As our client, we are allowed to send you marketing material about our own similar products and services. As a visitor to our website, we are also permitted to approach you for your consent to receive our marketing materials.
- 11.2 In all instances, you may opt out of receiving further marketing materials from us at any time and manage your communication preferences by:
- 11.2.1 following the unsubscribe instructions included in each marketing email or SMS text message from us; or
 - 11.2.2 sending an email to popi@quillcs.co.za including your details and a description of the marketing material you no longer wish to receive from us. We will comply with your request as soon as is reasonably practicable.
- 11.3 If you opt out of receiving marketing-related communications from us, we may still send you administrative messages as part of your ongoing use of our website, solutions, products or services.
- 11.4 We do not provide your Personal Information without your consent to unaffiliated third parties for direct marketing purposes or sell, rent, distribute, or otherwise make Personal Information commercially available to any third party.

12 SOCIAL MEDIA

We operate and communicate through our designated channels, pages and accounts on some social media sites to inform, help and engage with our users. We monitor and record comments and posts made about us on these channels so that we can improve our services. The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users. When you engage with us through social media, your Personal Information may be processed by the site owner; this processing occurs outside of our control and may take place in a country outside South Africa that may have different privacy regulations. We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible but cannot guarantee that we will read or reply to all messages sent to official QCS social media accounts. Consistent feedback and helpful suggestions will be given to the relevant people within the company for consideration, but we cannot guarantee that any feedback or suggestions will be acted upon by QCS.

13 CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice at any time. The most updated version will always be available on www.quillcs.co.za/ **Unless otherwise stated, any new Privacy Notice will supersede the previous Notice.**

14 YOUR RIGHTS

- 14.1 Upon your request, we will provide you with access to any Personal Information on you that we may hold. You may also request us to correct your Personal Information, at any time. You can contact us on popi@quillcs.co.za to request access to your Personal Information or the correction of your Personal Information. You can also seek to be removed from any of QCS' subscriptions lists at any time by contacting us on popi@quillcs.co.za.
- 14.2 Please note that the above rights are not absolute, and QCS may be entitled to refuse requests where exceptions apply.
- 14.3 If you have any complaint about the way in which QCS handles your Personal Information, you may lodge a complaint with QCS by emailing popi@quillcs.co.za. Our Information Officer will then look into your complaint and work with you to resolve the matter.
- 14.4 If you still feel that your Personal Information has not been handled appropriately according to the law, you can contact South African Information Regulator (infoereg@justice.gov.za) and file a complaint with them.

This Privacy Notice was last updated on :	14 November 2024.
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