

# PRUDENTIAL ONLINE PRIVACY POLICY



## Online privacy policy is valid and effective as of 30 June 2017

Set out below are details about the Prudential Portfolio Unit Trusts Limited ("PUT") privacy policy ("Policy"). This Policy applies to the collection, use, disclosure and protection of personal information relating to clients of PUT and its holding company and all subsidiaries, affiliates and related entities; all vendors and suppliers of PUT; and all users of this Website. Furthermore, this Policy forms part of and should be read together with the terms and conditions of this website: [www.myprudential.co.za](http://www.myprudential.co.za) ("Website").

### 1. Basic Principles

- 1.1. At PUT we respect and take your privacy seriously, and as such we will use and process the personal information that we collect from you in accordance with this Policy.
- 1.2. Please be aware that we collect and process your personal information for lawful purposes which are related to the functions and business activities of PUT, and that such purpose/s are compatible with and necessary in order for us to pursue and maintain the legitimate interests of PUT.
- 1.3. We undertake to collect and process your personal information in a reasonable manner, and in such a way that the processing is adequate, relevant and not excessive. We also undertake to take reasonable steps to ensure that the personal information that you provide to us remains accurate.

### 2. What we mean by personal information

- 2.1. When we refer to personal information (or personal data) in this Policy, we mean information that can identify you as an individual or is capable of identifying you. By personal information we do not mean general, statistical, aggregated or anonymous information or other derivative data that does not, alone or with other data, identify a specific individual.
- 2.2. We collect personal information from you when you voluntarily provide such information on the Website, for example, when you register on the Website, contact us with enquiries or use the products and/or services provided by PUT.

### 3. Consent

- 3.1. If you choose to provide us with personal information, you are consenting voluntarily and on an informed basis to PUT's collection, use and disclosure of your personal information and to the storage and transfer of that personal information.

### 4. The type of information we collect about you

- 4.1. PUT collects and stores the following personal information:
  - 4.1.1. email address, phone numbers, physical contact information, and (depending on the service used) sometimes financial information;
  - 4.1.2. computer sign-on data, statistics on page views, traffic to and from the Website and ad data (all through cookies - you can take steps to disable the cookies on your browser although this is likely to affect your ability to use the Website); and
  - 4.1.3. other information, including users IP address and standard web log information.

### 5. How we collect information about you

- 5.1. In general, you may provide personal information to us when communicating with us.
- 5.2. When you register with PUT on this Website, you will be asked to provide certain personal information, including your name, address and contact details. PUT uses the information that you provide to us during registration to enhance your experience, and to try and make your experience with us more productive and efficient.

- 5.3. You may order a product or a service and provide your name, e-mail address, delivery address, credit or debit card number and expiry date so that the order can be processed. On occasions, you may be asked for your telephone number.
- 5.4. When you call us, we may monitor or record your calls and details of the phone number(s) you use to make the calls. This information is used to better address your client service needs.
- 5.5. We will collect information concerning your likes and preferences both when you tell us what these are and through our analysis of client traffic, including through the use of cookies (as described below).
- 5.6. It may be that you provide to us details of credit or debit cards or bank accounts in order to make payments to us. Any such information ("confidential financial information") will be used by us only for the specific purpose for which it was provided to us.
- 5.7. We will always endeavour to secure the integrity and confidentiality of your personal information which is in our possession or under our control.

### 6. How we use your information

- 6.1. We may use your information to confirm that you have received the products or services which you registered for or have ordered from PUT; to validate you as a client when using our services; to prevent and detect criminal activity, fraud and misuse of or damage to our services or networks; to prosecute those responsible; or to contact you to invite you to form part of our consumer panel or various research groups.
- 6.2. We may also use your personal information and process such information for the purposes of management, research, analysis, corporate reporting and improving business efficiencies.
- 6.3. We may use personal information collected about you to contact you by post, telephone and electronic mail (that is e-mail, picture, video, and SMS) about functionality changes to the Website, services or changes to our terms and conditions and to communicate with you about your client benefits and advise you regarding the use of our services.
- 6.4. We may use the information collected about you to contact you by post or phone about new client offers and services. We may also contact you by electronic mail for these purposes, subject to any preferences selected by you.

### 7. How long do we keep your information for

- 7.1. The time periods for which we keep your personal information may vary according to the use or purpose attached to the information. Unless there is a specific legal or compliance requirement mandating us to keep your information, we will not keep it for longer than necessary for the purpose for which the information was collected or for which it is to be processed.

### 8. Disclosing your information to third parties

- 8.1. PUT does not sell or rent your personal information to third parties for their marketing purposes without your explicit voluntary and informed consent.
- 8.2. We reserve the right to access and disclose individual-identifying information to third parties to comply with applicable laws, regulations and lawful government requests, to operate PUT's systems properly or to protect PUT or its users or to solve any client disputes.
- 8.3. We may provide aggregate statistics about our products, sales, customers, traffic patterns and other website information to third parties, but these statistics will not include any information that could personally identify you.
- 8.4. We may from time to time elect to make use of other organisations to provide some of our services, and our services will then be offered through third party service providers on the Website. We may then share your personal

information with these organisations. These organisations can and will process this personal information, and will be obliged to keep such information confidential and to carry out the processing in reasonable manner that does not infringe your privacy.

### 9. Cross-border transfer of your information

- 9.1. PUT maintains collaborative relationships with various domestic and international vendors, subcontractors, strategic partners, and others who assist PUT and our clients in the conduct of our respective businesses. From time to time, PUT may transfer personal information to these parties to enable them to work with PUT, but PUT requires that they maintain the privacy of personal information in a manner satisfactory to PUT and consistent with applicable law.
- 9.2. PUT will ensure that whenever personal information is transferred to foreign countries, it will remain adequately protected.
- 9.3. It is PUT's policy not to transfer personal information to any entity, individual, or organisation located in countries that do not provide an adequate level of data protection, unless:
  - 9.3.1. you have given your consent;
  - 9.3.2. the transfers are needed to enter into or perform a contract with you;
  - 9.3.3. the transfers are needed for the conclusion or performance of a contract concluded in your interest;
  - 9.3.4. the transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
  - 9.3.5. the transfers are permitted under applicable law.
- 9.4. Personal information transferred to another country may be subject to all the laws of that country, including laws related to money laundering, corruption and bribery, national security and anti-terrorism, which may permit local law enforcement or regulatory agencies to obtain access to information held by private businesses.

### 10. Cookies

- 10.1. PUT may also collect personal information through the use of "cookies" in order to provide better client service. A cookie is a piece of information that is stored on your computer's hard drive by your web browser for record-keeping purposes. On revisiting the Website, our computer server will recognise the cookie, giving us information about your visit.
- 10.2. During the registration process we allocate cookies for our services. These cookies will hold information collected during your registration and will allow us to recognise you as a client and provide you with the services you require. If your browser is set to reject cookies, you may not be able to register for our services. We may also use this data to better understand your interests while online and to personalise your visits to the Website.

### 11. How can you refuse or opt out of cookies

- 11.1. Most browsers are set by default to accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance and to prompt you every time a cookie is sent to you or to allow you to choose not to receive cookies at all. Turning off cookies will not prohibit you from using the Website, it may however limit your use of the Website.

### 12. Security

- 12.1. PUT uses different technology, tools and procedures (for example, encryption, passwords, physical security) to protect your personal information against unauthorised access and disclosure, however, PUT makes no representations or warranties whatsoever in this regard.

### 13. Access, modification and deletion of your information

- 13.1. You have the right at any time to request that we confirm the personal information which we hold about you, and to request that we correct any incorrect or inaccurate personal information which we hold about you.
- 13.2. In addition, you can see, modify or erase most of your personal information by contacting us to review any personal information that PUT holds about you. PUT deletes personal information when PUT no longer needs it for the purposes that are described earlier.
- 13.3. If you would like us to stop processing your personal information for marketing purposes, please write to us at [info@prudential.co.za](mailto:info@prudential.co.za).

### 14. General

- 14.1. Your access to and use of the Website is subject to the PUT terms and conditions
- 14.2. This Policy shall be governed in all respects by the laws of the Republic of South Africa.
- 14.3. The Website and the business of PUT may change from time to time, and as a result, at times it may be necessary for PUT to make changes to this Policy. PUT reserves the right to update or modify this Policy at any time, and from time to time, without prior notice to you. Please review this Policy periodically, and especially before you provide any personal information to PUT. This Policy was last updated on the date indicated above. Your continued use of the Website after any changes or revisions to this Policy shall indicate your agreement with the terms of such revised Policy.
- 14.4. This document describes PUT's privacy policy. However, this Policy does not grant or create any additional rights or remedies for users of the Website or any data subjects (as this term is used under applicable law), or any additional obligations on the part of PUT other than those obligations required by applicable law.