



BESIGE BREINTJIES PRIVACY POLICY

1 INTRODUCTION

- 1.1 Besige Breintjies Proprietary Limited with registration number 2015/075712/07 ('we', 'us', 'our', '**Besige Breintjies**') is a virtual educational programme designed to develop and improve children's intellectual, social, physical and emotional well-being through one-on-one interaction between parent and child. Besige Breintjies is part of a group of companies including The Box Fashion, Isabella Garcia International, IPS Health and Wellness and Platinum Life ("**the Group Affiliates**") which enables us to provide holistic care and support to our clients, including –
- 1.1.1 child learning support, nurturing creativity and imagination and overall development.
 - 1.1.2 insurance products;
 - 1.1.3 personal care enhancements (including, amongst others, facial care and fashion); and
 - 1.1.4 general health and wellness products.
- 1.2 Our business model is largely based on a referral system. Therefore, our success depends on referrals from our clients and our relationship with policy holders, clients and business partners. This relationship is built on trust and quality service. When we collect your personal information from sources other than directly from you, you will have had to confirm that you are agreeable for others to have shared your information. In order to provide holistic care and support to our clients we rely on all Group Affiliates and their services. Besige Breintjies and the Group Affiliates are committed to offer you an all-encompassing solution, that is in your interest and that will benefit your health and wellbeing.
- 1.3 We value our members, clients and business partners. We understand the sensitive nature of the personal information which we hold. It is for this reason that the protection of your personal information (including the personal information of your child) is one of our top priorities. We endeavour to maintain the confidentiality of your personal information and process your personal information in adherence to the Protection of Personal Information Act 4 of 2013 ("**POPIA**").
- 1.4 This privacy policy ("**privacy policy**") explains -



- 1.4.1 how we collect, use, transfer and protect your personal information; and
- 1.4.2 the rights you have in relation to your personal information in terms of POPIA.

1.5 This notice may be revised from time to time as and when necessitated by the changes in our growing business and updated versions of this notice will be posted on our website and be made available via email on request. If you wish to receive this privacy policy by email you may do so by request to our information officer at informationofficer@besigebreintjies.co.za.

2 WHAT IS PERSONAL INFORMATION

2.1 In terms of POPIA, personal information is information that may be used to identify an individual or a company.

2.2 Examples of personal information include, but are not limited to –

- 2.2.1 name;
- 2.2.2 identification number;
- 2.2.3 contact information;
- 2.2.4 financial information;
- 2.2.5 information relating to race, gender or sexual orientation, age;
- 2.2.6 physical or mental health;
- 2.2.7 disability; and
- 2.2.8 language.

3 PERSONAL INFORMATION THAT WE COLLECT

3.1 We collect and use personal information mainly to perform direct marketing, and to perform contractual obligations. We undertake direct marketing in instances where we have a pre-existing relationship with, you have agreed for us to contact you for purposes of direct marketing or where we have asked you permission to do so. In other words, where there is a legitimate and mutual interest.

3.2 We may collect personal information which includes, but is not limited, to–



Type of information	Description of information
Identification and contact information and Information that will assist us to provide products and services to you	<ul style="list-style-type: none">• name• physical and postal address• email address• telephone or other contact details• gender• marital status• date of birth• educational background• physical attributes• photos• employment history• the relationship that you, as the client, have with others including dependants• identification number
Financial information and account details	<ul style="list-style-type: none">• bank account number and account details• credit history• credit score
Medical condition and health information	<ul style="list-style-type: none">• current physical, mental or medical condition• past physical, mental or medical condition• injury or disability information
Other sensitive information	<ul style="list-style-type: none">• family medical history• details of your children• other sensitive information voluntarily provided by you

3.3 We may also collect feedback, comments and questions received from you in service-related communication and activities.



- 3.4 When personal information is collected, we will indicate the purpose for the collection of the personal information and whether the personal information required is compulsory or voluntary. We will, to the extent possible, inform you of the consequences for failing to provide the requested information.

4 HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information in one of the following ways –

- 4.1 directly from you through a telephone call centre;
- 4.2 from our clients that refer you to us;
- 4.3 when you use our website your information may be automatically collected (e.g. data gathered by cookies);
- 4.4 when you use our website for online queries or chat box functionality;
- 4.5 when your personal information is publicly available; and
- 4.6 if you gave consent to the collection of your information from another source (including our Group Affiliates) and we have provided you with the detail of the source

5 USE OF PERSONAL INFORMATION

Personal information collected by us may be used, stored, disclosed or shared for the following purposes –

- 5.1 to communicate with you regarding membership information, your membership application and membership servicing;
- 5.2 to send you important information regarding changes to our memberships, and other terms and conditions;
- 5.3 testimonials;
- 5.4 to process your premium and other payments;
- 5.5 to analyse and manage other commercial risks;
- 5.6 to conduct market research;
- 5.7 to provide marketing information to you (including information about other products and services in the interest of your overall well-being linked to your policy, offered by Group Affiliates and in so doing enhance our holistic service to you by ensuring you have the necessary care);
- 5.8 to comply with our internal policies and procedures such as –



- 5.8.1 audit reports;
- 5.8.2 finance and accounting;
- 5.8.3 billing and collections;
- 5.8.4 IT systems;
- 5.8.5 data and website management; and
- 5.8.6 records management.
- 5.9 to respond to queries or resolve complaints
- 5.10 to handle requests for the correction, updating, access or deletion of your personal information; and
- 5.11 to comply with applicable laws and regulatory obligations.

6 SHARING OF PERSONAL INFORMATION

6.1 Access to your personal information within Besige Breintjies and the Group Affiliates is restricted to those individuals who require access to your personal information for business purposes.

6.2 In order to provide products and services to you that enhances holistic care and support, we share your information with the following Group Affiliates, which are our sister companies –

6.2.1 The Box Fashion, a South African fashion accessories service company;

6.2.2 Isabella Garcia International, a company offering a comprehensive range of products catering for specific needs, desires and all skin types of all genders;

6.2.3 IPS: Health and Wellness, a lifestyle company focused on providing clients with nutritional supplements based on their unique requirements;

6.2.4 Platinum Life is an authorised financial services provider, offering top-class insurance services which include male and female cancer cover, permanent disability cover by accidental causes and accidental death cover.

6.3 We may also share your information with other companies who are not Group Affiliates. This will only be done to the extent that it is in pursuance of our legitimate interests or once you have given us your explicit and prior consent to do so. Furthermore, we may share your personal information with third parties in the event of any of the following occurring –



Merger	Civil rehabilitation
Acquisition	Joint-venture
Assignment	Transfer of all or any part of Besige Breintjies
Any insolvency or similar proceedings	

6.4 Where we disclose your personal information to the above parties, they will be bound to use that personal information for the reasons and purposes it was provided to them and not for any other purpose.

6.5 Besige Breintjies may be obliged to disclose your personal information to the extent that it is required to do so by law or where we believe it is necessary to protect our rights.

7 SECURING YOUR PERSONAL INFORMATION

7.1 Besige Breintjies will –

7.1.1 take reasonable and appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access. This includes, for example, encryption your personal information and ensuring that adequate firewalls are in place;

7.1.2 provide you with access to your personal information to view and/or update your personal details;

7.1.3 promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information; and

7.1.4 provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable notice and request;

7.2 Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful



disclosures of your personal information, whilst in our possession, by a third party who is not subject to our control, unless such disclosure is as a result of our gross negligence.

7.3 If you disclose your personal information to a third party, such as an entity which operates a website linked to this website or anyone other than Besige Breintjies, BESIGE BREINTJIES SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.

7.4 All information obtained by Besige Breintjies is stored on dedicated servers within the borders of South Africa. The servers are secured behind a firewall and access to the servers are password protected and strictly limited. Notwithstanding this, no security measures or systems are impenetrable. We cannot make any guarantees against data breaches.

8 HOW YOU CAN REVIEW AND CORRECT YOUR PERSONAL INFORMATION

8.1 We undertake to provide you with access to your personal information and provide mechanisms so that any personal information found to be inaccurate or incomplete can be corrected or amended as feasible, subject to any requirement or rule for such personal information to be retained by law.

8.2 Prior to the amendment, correction or removal of your personal information, we will require you to identify yourself and to identify the portion of information requested to be amended, correct or removed. A request for the amendment, correction or removal of personal information may be declined if the process of the request is unreasonably repetitive, require disproportionate technical effort, or jeopardizes the privacy of others.

8.3 The services of access and correction of personal information is done free of charge, except to the extent that it would require disproportionate effort by Besige Breintjies. Once personal information is deleted, residual copies of the information may take a period of time before they are deleted from our servers and may remain in our backup systems.



- 8.4 It is important that any information you provide directly to us is accurate and correct. Please let us know as soon as you can if any information that we hold about you is no longer correct.
- 8.5 Providing false or inaccurate information in order to obtain a product or service may also result in said product or service being restricted or cancelled.
- 8.6 For further information on how to exercise your right of access to personal information, please refer to our procedure for data subject access to, objection to, correction or deletion of personal information processed by Besige Breintjies as set out in the PAIA/POPIA Manual which is available at <https://besigebreintjies.co.za/wp-content/uploads/2021/10/BB-PAIA-and-POPIA-manual.pdf>.

9 DATA RETENTION

- 9.1 We will only retain your personal information to the extent and duration that we have a legitimate interest to process your personal information as defined in point 5 above (“Use of Personal Information”).
- 9.2 We will upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged to retain.

10 CROSS BORDER PERSONAL INFORMATION TRANSFERS

To the extent that we transfer your personal information outside the borders of South Africa, we will ensure appropriate safeguards are in place, including, for example, ensuring that the third party who is the recipient of the information is subject to a law or binding agreement which provides for an adequate level of protection similar to POPIA.

11 YOUR RIGHTS AS A DATA SUBJECT

- 11.1 As a data subject, you have a number of data privacy rights. These rights include –



11.1.1 **a right of access:** subject to certain exceptions, a data subject after providing adequate proof of identity has the right to –

11.1.1.1 request Besige Breintjies to confirm whether any personal information is held about the data subject; and/or

11.1.1.2 request from Besige Breintjies a description of the personal information held including information about third parties who have or have had access to personal information.

11.1.2 **a right to request correction or deletion:** a data subject may request Besige Breintjies to –

11.1.2.1 correct or delete personal information about the data subject in our possession or control that is inaccurate, irrelevant, excessive, outdated, incomplete, misleading or obtained unlawfully; and/or

11.1.2.2 destroy or delete a record of personal information about the data subject that Besige Breintjies is no longer authorised to retain in terms of the relevant legislative provision.

11.1.3 **a right to withdraw consent and to object to processing:** a data subject that has previously consented to the processing of his/her/its personal information has the right to withdraw such consent and may do so by providing Besige Breintjies with notice to such effect to our Information Officer (at the contact details set out below). Furthermore, a data subject may object, on reasonable grounds, to the processing of personal information relating to him/her/it;

11.1.4 **a right to not be subjected to direct marketing by means of unsolicited electronic communications:** a data subject has a right not to be subject to direct marketing by means of unsolicited electronic communications unless you have given us your consent or you are an existing customer of ours;



11.1.5 **a right not to be subjected automated decision making:** a data subject has a right not to be subject to a decision which results in legal consequences for him/her/it which is based solely on the basis of the automated processing of personal information.

11.2 As a data subject you also have a right to lodge a complaint to the Information Regulator of South Africa if you are unsatisfied with the manner in which Besige Breintjies addresses any complaint with regard to Besige Breintjies' processing of your personal information, the contact details of the Information Regulator are as follows –

website: <http://justice.gov.za/infoereg/>
Tel: 012 406 4818
Fax: 086 500 3351
Email: infoereg@justice.gov.za

12 CONTACT US

If you have any questions about this notice our treatment of your personal information or wish to exercise any of your rights, please address an email to informationofficer@besigebreintjies.co.za.

13 VERSION CONTROL

Last updated: **January 2022.**