

**DESTINY UMBRELLA PENSION FUND**  
**DESTINY UMBRELLA RETIREMENT FUND**  
**DESTINY RETIREMENT PRESERVATION PENSION FUND**  
**DESTINY RETIREMENT PRESERVATION PROVIDENT FUND**  
**DESTINY UNCLAIMED BENEFITS PENSION PRESERVATION FUND**  
**DESTINY UNCLAIMED BENEFITS PROVIDENT PRESERVATION FUND**  
**DESTINY RETIREMENT ANNUITY FUND**  
(THE "FUNDS")

PROTECTION OF PERSONAL INFORMATION ACT, 2013  
POLICY STATEMENT

This document represents the overall Policy Statement which is required in terms of the Protection of Personal Information Act, 2013 for the Funds.

For the purposes of this Policy Statement, the following terms are being used and have the following meanings:

**FUNDS** shall have the meaning assigned to them in the heading to this document however, in terms of POPIA, each of the Funds is to be considered a Responsible Party.

**GIB** shall mean GIB Financial Services (Pty) Ltd.

**INFORMATION OFFICER** shall mean the person appointed by the Board of Trustees of the Funds to be the Information Officer in terms of POPIA and who has been approved by POPIA and whose function is to be the co-ordinator and facilitator in terms of POPIA between the Funds, Members, the Operators and the Regulator as defined in POPIA.

**MEMBER** shall mean a Member of the Funds, as defined in the Rules of the Funds. As far as POPIA is concerned it means the person to whom the collection and processing of personal information relates and is the person who is subject to the protection afforded in terms of POPIA and who is defined therein as a Data Subject.

**OPERATOR** shall mean GIB and any other corporate body or individual which or who, in terms of a written agreement, is to provide services to the Funds involving personal information in respect of a Member.

**POPIA** shall mean the Protection of Personal Information Act, 2013

***Purpose of the Policy Statement in terms of POPIA***

The overall purpose of this Policy Statement is to protect Members of the Funds from harm by means of the protection of their personal information. This includes the protection of their monetary assets in the Funds as well as details of their identity and the identity of their dependants and beneficiaries and to ensure, as far as is possible, their privacy which is a fundamental human right in terms of the Constitution of the Republic of South Africa.

The principles enshrined in POPIA are to regulate the protection of personal information and the Constitutional right to privacy as a consequence. POPIA will attempt to regulate every step of the processing of personal information from how personal information is handled when it is collected until the time of its destruction.

**Principles of Operation of POPIA**

**Accountability**

Each of the Funds is a Responsible Party in terms of POPIA and must take the full responsibility for the protection of personal information for Members by means of appointing the necessary Operators, an Information Officer and any other party required by law to deal with the operation of the Funds. The Funds have to ensure the protection of Member's rights by means of lawful processing of their personal information by Operators and to monitor those processes on a continuous basis. The Funds are

responsible for Members' personal information from the time it is requested and received until the time of its destruction.

### **Processing Limitations**

The Funds and any Operator must only collect such Member information for the specific purpose for which it is intended. Personal information can only be obtained from the Member who must give consent to the collection of information and if the Member objects to such request for information he or she has a right to withhold that information being collected. Attention to contracts of employment will be important in this regard.

### **Purpose Specification.**

When personal information is requested, a Member must be made aware of the reason for its use and how it is to be used.

### **Further Processing Limitations**

If personal information has to be processed by more than one Operator, such processing must be compatible with the purpose for which the information was collected as indicated in Purpose Specification above and may not be used for any longer than the purpose for which it was intended by the other Operator.

### **Information Quality**

The Funds are responsible for overseeing that personal information collected from Members is complete, accurate and updated where necessary and is relevant for the purpose for which it is required.

### **Openness**

The Funds must at all times ensure that Members are aware of how personal information is being processed and the outcomes of the procedures of processing.

### **Security Safeguards**

The Funds have to ensure that personal information is kept secure against the risk of loss, unlawful access, interference, modification, unauthorised destruction and disclosure. Safeguards have to be put into place with Operators for the security and confidentiality of personal information and written agreements will be required from Operators as to the modus operandi of achieving the necessary secure nature of personal information.

### **Member Participation**

In terms of POPIA a Member has a right to access their personal information collected and used by the Funds for the purposes of ascertaining details of retirement benefit accumulation and other benefits relating to death and disablement as may be put in place by the Member's employer. If insured benefits are part of a Member's employment package, an insurance company has the right, in terms of POPIA, to withhold information about a Member's health since this matter will fall firmly in the hands of a Member's medical practitioner.

**Accepted by the Trustees of the Funds and the Principal Officer on 30<sup>th</sup> June 2021 that the above document indicates a statement of intent and purpose in respect of the Funds and the provisions of the Protection of Personal Information Act, 2013**