



# ANSLOW MANAGEMENT CONSULTANTS (PTY) LTD INCLUDING SUBSIDIARY AND ASSOCIATED COMPANIES (AMC)

## PRIVACY POLICY AND STATEMENT

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## **1. INTRODUCTION**

- 1.1. Anslow Management Consultants (Pty) Ltd (hereafter “AMC” or “The Group’s”) respects the privacy and protection of personal information is applicable to all The Group’s clients and connected parties. The Group’s is committed to ensuring the security and protection of the personal information that it processes and to provide a compliant and consistent approach to all aspects of data protection.
- 1.2. This privacy statement, together with the AMC POPIA and PAIA manual, aims to let all clients know how AMC will treat any personal information that it may have hold in respect of the client and how they can access such personal information held. Reference made to “POPIA” means the Protection of Personal Information Act 4 of 2013 and reference made to PAIA means the Promotion of Access to Information 2 of 2000 as amended.
- 1.3. If and when clients/customers visiting The Group’s website, communicating electronically with us and making use of all services, they (the client) consent to the processing and transfer of their personal information as set out in this privacy statement hereafter. AMC will take all reasonable measures, in accordance with this Statement, to protect the client’s personal information and to keep it confidential.
- 1.4. For the purpose of this privacy statement, “personal information”, “data subject” and processing all have the meanings provided in respect thereof in the POPIA.
- 1.5. We may collect website usage information using “cookies” which allows us to collect standard internet visitor usage information. Details of all other documents pertaining to terms and conditions of personal information are available on The Group’s website.
- 1.6. We retain the right to amend this Privacy Statement at any time, without prior notice, by posting the amended statement on The Group’s website.

## **2. APPLICATION OF THE PRIVACY STATEMENT**

- 2.1. The Group’s privacy practises apply to the processing of the client personal information collected by us or on The Group’s behalf, such as data subjects who use The Group’s website and/or The Group’s products and services, and/or who provide us with products and services, customers and any other data subjects who engage with The Group.
- 2.2. This privacy statement does not under any circumstances apply to third party websites linked to The Group’s website, or websites that link to or advertise on The Group’s website.

### **3. COLLECTION OF PERSONAL INFORMATION**

- 3.1. Personal information may be provided to us by a client and/or collected by us when the client engages with us and/or on the client's use of The Group's products and services, and/or when the client provides us with the client's products and services, and/or when a client accesses The Group's website or from third parties (such as Regulators).
- 3.2. The type of personal information collected will depend on the purpose for which it is collected and used. The specific purpose for which the information is collected will be apparent from the context in which the information is requested including but not limited to when:
  - I. A client purchases and/or uses The Group's products and services.
  - II. The client submits enquiries to The Group or makes contact and the client is required to provide the client name and surname, identity or passport number, account number, postal or street address, title, contact numbers or e-mail address.
  - III. The client makes use of The Group's website or interacts with The Group on social media, and may collect the client non-personal browsing habits and click patterns, e-mail address, IP address, telephone data information or username and password.
  - IV. The client applies for employment opportunities at The Group and the client may be required to provide his/her name and surname, identity number, employment history, and criminal behaviour.
  - V. The client visits The Group office premises where CCTV cameras are installed.
  - VI. Where possible, we shall inform the client what information is voluntary or mandatory for the client to provide and the consequences for failing to provide the requested information.
  - VII. The Group will only retain the client personal information as long as necessary for the fulfilment of those purposes as have been identified and/or as required by law and/or as agreed with the client.

### **4. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION COLLECTED**

AMC only collects general personal information (some of which may be publicly available) and aims to only collect that personal information which is necessary for it to carry out its Services and other facilities provided to the client. AMC collects the following categories of personal information:

- I. **Member** – such as name, contact details, email, physical and postal addresses, company details, designations, professional experience, work experience, (CV's) and qualifications. Member profiles provide for other information to be provided but this is voluntary information that can be provided at the discretion of the member.
- II. **Alumni (Training and Event Delegates and past Corporate Clients)** – such as name, contact details, email, physical and postal addresses, company details and documents (where necessary), dietary requirements and allergies. With regard to Corporate Services company documents required for services and specifically in respect of Board Appraisal Services, director's personal opinion on the performance of the board is collected and stored for the purpose of reporting. Further information may be requested by AMC depending on the service being provided or for statistical or health and safety reasons.
- III. **Directors Designations** – same information as per Members above including records of results and decisions, certification records such as date awarded, and such information as may be required from the South African Qualifications Authority from time to time.
- IV. **Suppliers/Procurement** – such as company name, address and contact details, banking details, VAT number and BEE certificate/level information.
- V. **Website** – such as general website page analytics and usage information through the use of cookies (all such information is un-identifiable information for the purpose of POPIA); as well as in some instances website user (i.e., non-member and alumni) name and contact details for access to specific AMC content/services not freely available to the general public.
- VI. **Employees** – all applicable employee information required to be kept from a labour law perspective and running of the organisation. Such information relates to internal employees and not external clients. As such the balance of this Policy will not cover Employee Information as this is dealt with in AMC internal HR Policies. Furthermore, external parties (unless with applicable Court Orders or legal reasons) shall not have access to Employee Information.

### **5. HOW WE USE THE CLIENT INFORMATION**

- 5.1. Personal information will only be processed for the purposes for which it was collected and/or to comply with legal and regulatory obligations and/or as authorised by law and/or with the client consent.
- 5.2. The purposes for which The Group may process personal information includes, but is not limited to:
  - I. Respond to the client enquiry
  - II. Provide services or products to the client.
  - III. Provide access to restricted pages of The Group's website.
  - IV. Comply with legal requirements or industry codes.
  - V. Market or promote The Group's services and products.
  - VI. Safety and security reasons
  - VII. Compile non-personal statistical information about browsing habits, click patterns and access to the AMC website.

### **6. DISCLOSURE OF INFORMATION**

- 6.1. AMC may disclose the client personal information to third parties in certain circumstances, which include, but are not limited to:
  - I. Where The Group has the client's consent.
  - II. Where required to do so by law.
  - III. To The Group's service providers who are involved in the delivery of products or services to the client, where agreements are in place to ensure that they comply with these privacy terms.
- 6.2. Third parties to whom The Group discloses personal information to include, but are not limited to:
  - I. Service providers to The Group Companies.
  - II. Accredited debit collection agencies.
  - III. Regulators, courts, tribunals and law enforcement agencies.
- 6.3. The Group may compile, use and share any information that does not relate to any specific individual and retain all rights to non-personal statistical information collected and compiled by The Group.

### **7. TRANSFER OF INFORMATION**

- 7.1. The Group may need to transfer the client personal information to another country for processing or storage. The Group will ensure that anyone to whom it passes the client personal information agrees to treat the client information with similar protection as provided for in the POPIA.
- 7.2. With the clients consent, The Group may transfer the client information to other countries which do not have similar protection as provided for in POPIA,

### **8. INFORMATION SECURITY**

- 8.1. The Group takes appropriate and reasonable technical and organisational measures to prevent any unauthorised or unlawful access, loss of, damage to or unauthorised destruction of personal information.
- 8.2. The Group has implemented various policies, procedures and standards to safeguard personal information.
- 8.3. The Group regularly verify that the safeguards are effectively implemented and ensure that they are continually updated in line with best practice.
- 8.4. The Group has implemented procedures to address actual and suspected data breaches and undertakes to notify the client and the relevant regulatory authorities of breaches in instances in which The Group is legally required to do so and within the period in which such notification is necessary.
- 8.5. Notwithstanding paragraph 7.1. to 7.3. above, to the extent permissible by law, The Group shall not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of the client personal information.

### **9. DATA SUBJECT RIGHTS**

- 9.1. Subject to the POPIA provisions, the client has the right to:
  - I. Request access to the client personal information.
  - II. Request, where necessary, the correction, destruction or deletion of the client personal information.
  - III. Object to the processing of the client personal information.
  - IV. Submit a complaint to the Information Regulatory regarding the alleged interference with the protection of the personal information.
  - V. Institute civil proceedings regarding the alleged interference with the protection of the client personal information.

### 10. SUPPORTING TERMS AND CONDITIONS

The privacy statement can be read in conjunction with privacy matters and conditions for lawful procession of personal information that is contained in various supporting documents on AMC and its subsidiary company corporate website: <https://anslow.co.za/>

### 11. USE OF COOKIES

- 11.1. AMC may use “cookies” to enhance the client experience as a customer (referred to as the “user”). The user’s web browser places cookies on a hard drive for record-keeping purposes and to track information about them. The user may choose to set its web browser to refuse cookies, or to be notified when cookies are being sent. If the user does so, note that some parts of the website service may not function properly.
- 11.2. AMC collects, stores and uses the abovementioned information for the following purposes:
- I. To communicate requested information to the User.
  - II. To provide services to the User as requested by the User.
  - III. To authenticate the User.
  - IV. To provide the User with access to restricted pages on this website.
  - V. To compile non-personal statistical information about browsing habits, click patterns and access to the The Group websites.
- 11.3. Information detailed above is collected either electronically by using cookies or is provided voluntarily by the User. Users may determine cookie use independently through their browser settings. For purposes of this clause, a cookie means a small computer file created by a web browser to save user information for a website.
- 11.4. Cookies ensures that The Group is able to continually improve its website. The Group utilise “first party cookies” (originally from us) to simply track the user’s visits between sessions and deliver a more personalised experience. The Group also utilise “third party cookies” (not originating from us) to provide traffic analysis and tracking.
- 11.5. Cookies may be set through The Group’s site by The Group’s advertising partners. These cookies may be used by those companies to build a profile of the client interest and show the client relevant advertisements on other sites. They do not store personal information directly but are based on uniquely identifying the client browser and internet device. If the client does now allow these cookies, the client will experience less targeted advertising.



### 12. CONTACT DETAILS

Privacy enquiries may be submitted to the below email addresses

Anslow Management Consultants (Pty) Ltd: [gceo@anslowmancon.co.za](mailto:gceo@anslowmancon.co.za)  
Unison Guarantee Acceptances (Pty) Ltd: [info@sgiga.co.za](mailto:info@sgiga.co.za)  
Freshfields Insurance Brokers (Pty) Ltd: [info@freshfieldsib.co.za](mailto:info@freshfieldsib.co.za)  
NewBridge Reinsurance Brokers (Pty) Ltd: [debbiem@newbridgere.co.za](mailto:debbiem@newbridgere.co.za)  
Pine Forest Pre Primary School (Pty) Ltd: [office@pfpp.co.za](mailto:office@pfpp.co.za)  
Anslow Academy of Learning (Pty) Ltd: [gceo@anslowmancon.co.za](mailto:gceo@anslowmancon.co.za)

or to the addresses below:

The Information Officer  
P.O. Box 68756  
Bryanston 2021

The Information Officer  
Stellenberg  
363 Pretoria Avenue  
Ferndale Randburg

### 13. INFORMATION REGULATOR

The client has the right to lodge a complaint with the Information Regulator in writing as per its website: <https://www.justice.gov.za/inforeg/contact.html> to:

#### **Email**

Complaint's email [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
General Enquiries email [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

#### **Physical Address**

House 27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

#### **Postal Address**

PO Box 31533  
Braamfontein  
Johannesburg  
2107