



## **PROTECTION OF INFORMATION AND PRIVACY POLICY STATEMENT**

We respect your privacy and are committed to safeguarding your personal information and keeping it confidential. It is also a Constitutional right, legal and good business practice requirement, which is taken seriously.

This document sets out how we collect, use, share, otherwise process, and protect your personal information, in line with the Data Protection Laws applicable (including the Protection of Personal Information Act 4 of 2013 - "POPI Act").

ISGAM:

- Accepts joint responsibility and accountability with you to responsibly manage and protect your Personal Information when providing our services and solutions.
- Undertake to collect your Personal Information directly from you to ensure its accuracy and completeness.
- Will only use your Personal Information for the purposes required to assist you, provide solutions to you and to conclude the related agreements and consider the legitimate legal interests of everyone concerned, as required by the Act.
- Will respect your right to withdraw your consent for the processing of your Personal Information.
- Should your personal information be transferred to another country for processing and storage, we will ensure that anyone to whom we pass your information agrees to treat it with the same level of protection as we are obliged to.
- Undertake to be open and transparent and not to share or further process your Personal Information with anyone if not required for assisting you with your solutions or by the law.
- Undertake to safeguard and protect your Personal Information in our possession.
- Undertake to freely confirm what Personal Information we have, to update and correct the Personal Information and to keep it for no longer than legally required.

It is important to note that if you include the Personal Information of other Data Subjects when engaging with us, we will also process their Personal Information for the purposes set out in this Privacy Statement. When you give us Personal Information about other Data Subjects, you confirm that you have received their permission to share their Personal Information with us for the purposes set out in this Privacy Statement or any other related purposes.

### Your consent

Should you wish to engage with us, or make use of our services or offerings, we do require your acceptance of the terms and conditions of this Privacy Statement. This can be obtained by either signing a POPI consent letter, visiting our website ([www.isgam.ch](http://www.isgam.ch)), contacting us via phone, e-mail or other electronic communication including surveys and newsletters, or visiting our offices in person.

When you engage with us, you consent to the collection, storage, and processing of your information for the purposes set out below as prescribed by relevant laws and regulations and for reasons outlined below by ISGAM or a representative approved by ISGAM:

- To confirm and verify your identity or to verify that you are an authorised user for security purposes.
- To share with and provide relevant products or services to you, to carry out the transaction you requested and to maintain our relationship, as well as responding to your queries.
- To advise you of, or offer to you, any enhanced services, or new services that become available from time to time and which you may become entitled to or qualify for.
- For operational purposes required to assist you with the solutions you require.

- For audit and record-keeping purposes and in connection with possible requirements by the Information Regulator or other Government agency allowed by law, legal proceedings, or court rulings.
- To analyse, assess and improve our business and services.

Furthermore, you agree that we may keep your Personal Information until we are compelled or requested by you to delete it. Where we cannot delete your personal information, we will take all steps to de-identify (anonymise) the data. In some cases, we may use cookies and other tracking technologies to collect Personal Information or to collect information that becomes Personal Information if we combine it with other information. This enables us to improve your interactions with ISGAM.

A copy of ISGAM's Cookie Policy can be found on our website.

#### What choices do you have?

We respect your right to object to or withdraw your consent for the processing of your Personal Information. If you wish to receive a copy of the personal information we hold, withdraw your consent to process such information, or if any of your personal information is incorrect, inaccurate, or incomplete, please e-mail us at [enquiry@isgam.ch](mailto:enquiry@isgam.ch) putting "Personal Information" or "POPI" in the subject box to ensure your request is handled promptly. If we are unable to resolve any questions or concerns, you may approach the Information Regulator.

This Policy may be updated from time to time in line with changes to our business and the latest version applies whenever we are engaged. We are not responsible for the content or privacy practices of non-ISGAM websites to which our website may refer.

A Data Subject is a person to whom Personal Information relates and Personal Information is defined by the Protection of Personal Information Act (the Act) as; *"information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—*

*(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;*

*(b) information relating to the education or the medical, financial, criminal or employment history of the person;*

*(c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;*

*(d) the biometric information of the person;*

*(e) the personal opinions, views or preferences of the person;*

*(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;*

*(g) the views or opinions of another individual about the person; and*

*(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person".*



Signed by the Information Officer