

Mutualpark, Jan Smuts Drive, Pinelands 7405. PO Box 000, Cape Town 8000, South Africa. Tel +27 (0)86 0664 663, oldmutualhomeloans.co.za

Privacy Notice

At Old Mutual we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with the Protection of Personal Information Act.

This Notice explains how we obtain, use and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who we are
- What information we collect and from where we collect it
- The purposes for which we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction and deletion of information
- Changes to this Notice
- How to contact us
- The Information Regulator's contact details



IN ASSOCIATION WITH



Old Mutual Life Assurance Company (South Africa) Limited, Registration Number 1999/004643/06 is a licensed FSP, Life Insurer and Registered Credit Provider NCRCP15875.

Old Mutual Home Loans is an offering brought to you by Old Mutual Life Assurance Company (South Africa) Limited in association with SA Home Loans. SA Home Loans is a Registered Credit Provider (NCRCP1735) and a wholly owned subsidiary of SAHL Investment Holdings (Pty) Ltd. SA Home Loans (Pty) Ltd Reg No: 2006/035436/07. SAHL Investment Holdings (Pty) Ltd (Reg No.1998/004570/07) is the licensed controlling company of its insurance group, an authorised financial services provider (FSP No.2428) and registered credit provider (NCRCP1724).

 $\label{thm:co.za} \textit{Tel: 0860 664 663 Email Sales: } \underline{info@oldmutualhomeloans.co.za} \;\; Email \; \textit{Client Services: } \underline{admin@oldmutualhomeloans.co.za} \;\; \textit{Website: } \underline{oldmutualhomeloans.co.za} \;\; \textit{Client Services: } \underline{admin@oldmutualhomeloans.co.za} \;\; \underline{admin$



WHO WE ARE

In this Notice, "Old Mutual", or "we" refers to Old Mutual Life Assurance Company (South Africa) Limited who in association with SA Home Loans brings to you Old Mutual Home Loans.

THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. In order for us to do this, you must provide us with the information that we request, failing which we cannot enter into a relationship with you or assist you.

When you provide us with information about third parties (for example your spouse), we will process their personal information for the purposes set out in this Notice. You warrant that when you give us personal information about third parties, this information is accurate and correct and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent on their behalf.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you apply for a product or services from us or when you submit enquiries to us or contact us.

We also collect information, including criminal and medical information, about you from other sources, such as:

- Third parties for the purposes listed below, for example credit reference and fraud prevention and law enforcement agencies.
- Other insurers to prevent fraudulent claims.
- Other companies in the Old Mutual Group for the purposes listed below, or
 when we believe it will enhance the services and products we can offer to you,
 but only where you have not objected to such sharing. This includes
 supplementing the information that you provide to us with information we
 receive from other companies in the Old Mutual Group in order to offer you a
 more consistent and personalized experience in your interactions with Old
 Mutual, and to ensure that we have updated information about you.







We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal information from you directly, and we shall appreciate it if you would keep your personal information up to date and accurate. You can do so by contacting our Help Desk either via telephone on 0860 664 663 or via email at admin@oldmutualhomeloans.co.za whenever your details change.

Website usage information is collected using "cookies" which allows us to collect standard internet visitor usage information. This includes information about how you logged on and from our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of your approximate location information - please see the **Cookie Policy** on our website for further information on this.

PURPOSES FOR WHICH WE USE YOUR INFORMATION

We will use your personal and or special information only for the following purposes:

- To provide our products or services to you or entities related to you, to carry out the transaction you requested and to maintain our relationship
- For underwriting purposes
- To assess and process claims
- To conduct credit reference searches or verification
- To confirm and verify your identity, address and banking details
- To verify that you are an authorised user for security purposes
- For maintaining the accuracy of your personal information
- For operational purposes, and where applicable, searching of or updating credit bureau information; credit scoring and assessment and credit management
- For purposes of claim checks (e.g., industry Life and Claims Registers)
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- Maintaining such products for debt enforcement, including debt tracing or debt recovery
- Maintaining such products, for the purposes of deceased estates processes
- To trace you where you are uncontactable
- Maintaining information for internal administrative processes, including quality, risk, client or vendor management processes
- For internal and external business-related purposes and statistical or research purposes including to conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- Social responsibility
- In connection with legal proceedings.







We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect Old Mutual's interests).

We may also process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies as well as to other entities in the Old Mutual Group if you are matched to one of these sanctions lists

You agree that we may obtain and share information about your creditworthiness or the creditworthiness of any payer on your home loan with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history and sharing of information for purposes of risk analysis, tracing and any related purposes.

ONGOING FINANCIAL SERVICES

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you or offer you the opportunity to take part in competitions or promotions.

You may also withdraw your consent by contacting us at:

- Call us on 0860 664 663
- admin@oldmutualhomeloans.co.za

Please note that the communication channels highlighted under this section of the Privacy Notice applies to Old Mutual Home Loans and offerings brought to you by Old Mutual Home Loans. Opt outs and objections in terms of other products of the Old Mutual Group will be managed in accordance with the Privacy Notice available on Old Mutual's landing page.

DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.







We may share your personal information with:

- Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies.
- Other insurers to prevent fraudulent claims.
- Other companies / entities in the Old Mutual Group and, where appropriate, Old Mutual sponsored retirement funds, for the purposes listed above, or when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing.
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where you have consented;
- Where we have a duty or a right to disclose in terms of law or industry codes;
- It is necessary to conclude or perform under a contract, we have with you; or
- Where we believe it is necessary to protect our or a third party's rights.

INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure. Our security policies and procedures cover:

- Physical security
- Computer and network security;
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information
- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of personal information
- Investigating and reacting to security incidents

When we contract with third parties, we impose appropriate and reasonable technical and organisational security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We may wish to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.







YOUR RIGHTS

We will take all reasonable steps to confirm your identity when you exercise your rights.

Access to information

You have the right to request a copy of the personal information we hold about you. To do this, you may contact our Help Desk to review your personal information via telephone on 0860 664 663 or via email at admin@oldmutualhomeloans.co.za and specify what information you would like. You may also in terms of the SAHL PAIA manual contact us at InformationOfficer@sahomeloans.com. For any access requests to information about your other Old Mutual products, please visit Old Mutual's Group Privacy Notice available at www.oldmutual.co.za.

Objection to processing

In certain cases, you have the right to object to the processing of your personal information. If you want to object, please contact us at admin@oldmutualhomeloans.co.za

Correction of your information

You have the right to ask us to update or correct your personal information. You may contact our Help Desk via telephone on 0860 664 663 or via email at admin@oldmutualhomeloans.co.za to review and change your personal information.

Deletion of your information

You agree that we may keep your personal information until we destroy your information based on Old Mutual's destruction standards. You have the right to ask for deletion or destruction of your personal information – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may do this by contacting us at admin@oldmutualhomeloans.co.za.

Automated decision making

You agree that we may process your personal information by using automated means (without human intervention in the decision-making process) to make a decision about you or your application for any product or service you may query the decision made about you.







CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check this website periodically to inform yourself of any changes.

HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices, please contact us at **Privacy@oldmutual.com**.

INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are:

http://www.justice.gov.za/inforeg/index.html

General enquiries: enquiries@inforegulator.org.za

Complaints: POPIAComplaints@inforegulator.org.za

Version 1, July 2022



