

Introduction

Cubix Solutions (Pty) Ltd t/a Cubix recognises protecting personal information (privacy) as an important responsibility. As such, this Privacy Notice aims to describe our privacy practices – including the ways in which we collect, use, disclose and protect your personal information.

This Privacy Notice applies to all our services, products and any platforms we may use. When we refer to platforms, we refer to websites, mobile sites or apps, social media platforms or any other technology or mechanism you may use to interact with us.

This Privacy Notice will be reviewed periodically and may change from time to time. The amended version will be published on our website.

What Personal Information we may collect:

The types of information that we may collect and the process will include (but are not limited to):

- Your full names
- Identity or passport numbers
- E-mail, physical and postal addresses and contact information
- Your employment history and occupation
- Your health
- Your Education
- Your gender, race, marital status, language, disabilities

We will only collect information which is necessary for our legitimate business interests or required in terms of the law.

This information may be collected when you correspond with us by email, telephone or via social media, whether to apply for or purchase one of our products or services, or to make an enquiry or other request; when you purchase a product through us, request assistance with a service, fill in a form (paper or electronic); when you contact us and provide the information directly to us. We may collect information from our other group entities or our carefully selected business partners who offer products and services under one of our brands; or from other third parties who may lawfully pass your information on to us.

How and when will we process your personal information?

We may only process your personal information for the purpose for which it was provided.

This will include:

- When you browse our website
- When you require comprehensive financial planning, estate planning, fiduciary services and advice
- Fulfilment of our contractual and legal obligations to you
- To maintain our relationship with you
- To identify and market products, services or other offerings
- To provide or manage any information, products and/or services that you have requested
- To conduct verification and reference checks where required
- For general administration purposes
- For audit and record-keeping purposes
- To conduct statistical or market-related research
- To help us improve the quality of our products and services
- To help us detect and prevent fraud and money laundering
- To carry out analysis and customer profiling
- As required by legislation, regulation or industry codes

When will we share your information?

We will only share your information with approved third-party providers where necessary for the purpose agreed to by yourself. This includes our carefully selected business partners who provide products and services under one of our brands; and our service providers and agents who perform services on our behalf; or to refresh information during profiling. Information will be shared with government or law enforcement agencies where the law requires that we disclose it.

We will only transfer your personal information across South African borders if the relevant situation requires trans-border processing and storage. We will do so only in accordance with South African legislative requirements. Accordingly, you consent to transferring your personal information to third parties in foreign countries, where required. We will take steps to ensure that such third parties are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information.

How do we protect your personal information?

We make use of reputable service providers to ensure that care is taken to protect your information and also that we can restore the data should there be a technical problem. Client information is kept on our CRM tool and a cloud-based server.

If you give us information on behalf of someone else, you confirm to us that you have their permission to do so and that they are aware of the contents of this Privacy Policy and do not have any objection to our processing their information in accordance with this Privacy Statement.

If you are under 18, please do not provide us with any personal information unless you have the permission of your parent or legal guardian to do so.

Telephone calls to us may be recorded and/or monitored for training and quality assessment purposes.

We endeavour to keep our website secure at all times. However, we advise you that we cannot guarantee the security of any information provided to us or by us through our website, e-mail, internet or social media. We cannot be held responsible for any loss or unauthorised use or interception of information transmitted via the internet which is beyond our control. Our website may contain links to other websites outside of Cubix Solutions, Apex Motor/Zoom Motor Care and Elix Health. We are not responsible for other websites' content, privacy or security.

We use social plugins of social networks, including but not limited to plugins such as Facebook, YouTube, LinkedIn, Google+ and Twitter.

Please note that we have no influence on or control over the extent of the data retrieved by the social networks' interfaces, and we can accordingly not be held responsible or liable for any processing or use of personal information transmitted via these social plugins. For information on the purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for protecting your private sphere, please refer to the data protection information provided by the social network in question.

Communicating with you

When we communicate with you, we will do this by telephone, electronic mail, SMS and other electronic means selected by you wherever possible, and where this is not possible, using the South African postal service.

We will take reasonable measures to ensure the security of the documents sent to you. Still, we cannot be held liable for any unauthorised access or disclosure of your information once it has been sent.

Keeping your information

You acknowledge that your information will be stored by us. We will only process and retain your information for as long as the purpose for which we collected it continues to be relevant, or we are required to comply with legal or regulatory requirements or to protect our legal interests. This may mean that your information is retained for longer than the minimum time set out by the law.

What are your rights with regard to your personal information?

1. You have the right to request that we correct, destroy or delete any personal information that we processed for you. This would be information that is inaccurate, irrelevant, out of date, incomplete, misleading, obtained without your permission or that we are no longer authorised to retain. ***Please refer to the Cubix PAIA manual on our website for the process and forms to submit your request.***

2. You can object to the processing of your personal information at any time on reasonable grounds:

- If the information is not required to pursue your legitimate interests
- If the information is being used for Direct Marketing or unsolicited electronic communication, without your consent or by an unknown third party.

3. You can withdraw your permission for us to use your information at any time, provided that it does not affect the processing of your personal information:

- Prior to the withdrawal of consent
- If that processing is an obligation imposed by any law
- As required to finalise the performance of a contract in which you are a party
- As required to protect your, ours or a third party's legitimate interests.

You have the right to submit a complaint to the Information Regulator regarding an alleged interference with protecting your personal information.

You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.

Our Contact Information

If you have any questions or concerns with regards to this Privacy Policy, please contact us on the details below:

Information Officer	Andrew Moore
Deputy Information Officer	Miguel Rodrigues
Physical address	Talksure House, 62 Umhlanga Ridge Boulevard, Parkside, Umhlanga, KZN, 4051
Postal address	P.O. Box 1498, Umhlanga Rocks, 4320
Telephone number	+27(0) 31 013 2000 / 0860 33 33 43
Email address	POPIA_Complaints@cubix.co.za

The contact information for the Information Regulator is provided below.

The Information Regulator Contact Details:

- Tel: +27 (12) 406 4818
- Fax: 086 500 3351
- Email: infoereg@justice.gov.za