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INSURANCE & FINANCIAL SERVICES

AUTHORISED FSP – LICENSE No. 9952

POPIA Compliance Policy

Last Updated:	31 March 2026
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Reviewed by:	Kader Amien (CEO)
Approved and signed off by:	Azhar Amien (Managing Director)

1. Introduction

Amien & Associates CC (herewith referred to as “the Company”) is a licensed short-term insurance brokerage that processes personal information in the course of providing advisory and intermediary services to clients. This POPIA Compliance Policy outlines The Company’s commitment to protecting personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

Purpose

- To establish governance standards for the lawful processing of personal information.
- To ensure transparency, accountability, and compliance with POPIA.
- To protect clients, employees and third parties from risks associated with data misuse or unlawful and/or unauthorised distribution of said data.

Scope:

- This policy applies to all employees, representatives and key individuals, contractors and service providers
- As well as any third-party who processes personal information on behalf of or is associated with Amien and Associates CC in any capacity.

2. Definitions

Personal Information: Information relating to an identifiable, living natural person or existing juristic person, including but not limited to personal information such as

identification numbers, contact details, financial information, policy information, demographic information, and personal history.

Processing: Any operation or activity concerning personal information, including collection, storage, use, modification, dissemination, or destruction.

Data Subject: Any natural or juristic person whose personal information is processed by the Company.

3. Information Officer

Appointment: Azhar Amien, the Managing Director of Amien & Associates CC, is appointed as the Information Officer responsible for ensuring compliance with POPIA.

Duties: Azhar Amien will oversee the implementation of this policy, manage data breaches, and ensure staff training is conducted.

The Information Officer is responsible for:

- Developing and maintaining the POPIA compliance framework
- Ensuring staff training and awareness
- Managing data breaches
- Handling data subject requests
- Overseeing third party agreements
- Conducting annual POPIA audits and reviews

4. Data Collection and Processing

Lawful Processing: Personal information will be processed lawfully and in a manner that respects individual privacy and rights.

Purpose Specification: Personal data will be collected only for specific, explicitly defined, and legitimate purposes relevant to the services provided by Amien and Associates CC, such as but not limited to providing short-term insurance advice and intermediary services, underwriting and policy administration, claims handling and assessment, premium collection, compliance with FIAS, FICA and regulatory requirements and basic administration on behalf of clients.

Data Limitation: Information is collected directly from clients unless otherwise permitted, and processing thereof is based on consent, contractual necessity or legal obligation in the course of performing services on behalf of clients.

Accountability: The Company accepts responsibility for ensuring compliance with POPIA across all business activities and processes.

Retention & Destruction: Records are retained only for periods as is required by law (e.g FAIS requires a 5 year retention period) and thereafter information that is no longer required is securely destroyed or erased from the system.

5. Consent

Obtaining Consent: Consent will be obtained from individuals before processing their personal data. This will be documented to ensure transparency.

Withdrawal of Consent: Individuals have the right to withdraw consent at any time. Amien and Associates cc will provide clear procedures for individuals to do so.

Before collecting personal information, the Company informs data subjects of:

- What information is collected
- The purpose of collection
- Whether provision is voluntary or mandatory
- The consequences of withholding information
- Third parties with whom information may be shared
- Their rights under POPIA

Clients may withdraw consent at any time, subject to legal and contractual limitations.

6. Data Quality

Accuracy: Personal information must be accurate, complete, and updated as necessary to maintain data integrity.

Minimization: Only the minimum necessary personal information will be collected and processed to fulfil the intended purpose.

Clients may request corrections or alterations at any time where necessary.

7. Security Safeguards

Amien & Associates CC implements appropriate technical and organisational measures to protect personal information, including:

- Secure digital storage and encryption
- Access controls and password protection
- Physical file security
- Staff confidentiality agreements

8. Data Subject Participation

Data subjects have the right to:

- Access their personal information at any time
- Request corrections or deletions
- Object to processing of data
- Withdraw consent
- Lodge complaints with the Information Regulator

Procedures for access and complaints are aligned with PAIA and POPIA requirements.

9. Data Breach Management

Response Plan: A data breach response plan is in place to manage and mitigate the effects of any data breaches promptly.

Notification: In the event of a data breach, affected individuals and the regulator will be notified without undue delay.

Remedial Action: Should any data breach event occur, the Company will as soon as is reasonably possible conduct an analysis of any gaps or weaknesses in data security and seek to rectify same and prevent a reoccurrence.

10. Training and Awareness

Employee Training: Regular training sessions will be conducted to ensure all employees understand their responsibilities under POPIA and are aware of data

protection best practices. There will be annual refresher training done with all staff with records kept of same and guidance will be given to staff on their role in data protection.

11. Monitoring, Audits, and Review

Policy Review: This policy will be reviewed annually and updated as necessary to ensure ongoing compliance with legislative changes and evolving best practices.

- Annual POPIA audits are conducted.
- This policy is reviewed annually or when legislation changes.
- Non-compliance may result in disciplinary action.

12. Complaints Procedure

Data subjects may lodge POPIA-related complaints:

1. Directly with the Information Officer
2. If unresolved, with the Information Regulator

Complaint forms and procedures are available on request.