

# WEBSITE PRIVACY POLICY

## 3ONE CONSULTING ACTUARIES WEBSITE PRIVACY STATEMENT – EFFECTIVE 1 JULY 2020

**IF YOU DO NOT AGREE WITH ANY TERM OF THIS PRIVACY STATEMENT, YOU MUST  
CEASE YOUR ACCESS OF THIS WEBSITE IMMEDIATELY.**

### **1. Definitions and Interpretation**

- a. “3ONE” means 3ONE CONSULTING ACTUARIES.
- b. “Business” means the business of 3ONE Actuaries Consulting, which involves all operations of the Company and which includes all matters reasonably connected thereto, including matters relating to legal and corporate governance;
- c. “Information” means “personal information” and “special personal information” as defined in POPIA.
- d. “Personal Information” means information relating to an identifiable, living, natural person and where it is applicable, identifiable, existing juristic person, including all information as defined in the [Protection of Personal Information Act 4 of 2013](#).
- e. “Policy” means this policy and any amendments made to it from time to time;
- f. “Processing” means the creation, generation, communication, storage, destruction of Personal Information as more fully defined in the [Protection of Personal Information Act 4 of 2013](#).
- g. “You” or the “User” means any person who accesses and browses this website for any purpose.
- h. “Website” means the website of the 3ONE at URL 3one.co.za or such other URL as 3ONE may choose from time to time.

### **2. Background and Purpose of this Policy**

- a. POPIA is South Africa’s primary data protection law.
- b. The purpose of POPIA is to promote the protection of Information that is Processed by any person, by prescribing certain minimum requirements for the Processing of Information.
- c. These minimum requirements must be met in order for a person to Process Information and include those requirements set forth in clause 3 of this Policy.
- d. It is the policy of 3ONE that it will comply with the minimum requirements set forth in clause 3 of this Policy at all times.

- e. From time to time in the conduct of its Business, 3ONE will come into possession of and will concomitantly Process the Personal Information of its User.

### **3. Minimum Requirements for Processing Information**

- a. In order for 3ONE to Process Information in a manner which is consistent with POPIA, 3ONE must:
  - i. Process the Information lawfully and in a reasonable manner that does not infringe the right to privacy of the User whose Information is being Processed;
  - ii. Process the Information for a specific, explicitly defined and lawful purpose related to a function or activity of 3ONE;
  - iii. Process the Information only if, given the purpose for which it is Processed, it is adequate, relevant and not excessive and if:
    - the User whose Information will be Processed has consented to its Information being Processed;
    - it is necessary to Process the Information to carry out actions for the conclusion or performance of a contract to which the User whose Information will be Processed is a party; or
    - it is necessary to Process the Information to comply with an obligation imposed by law on 3ONE or to protect a legitimate interest of 3ONE and/or the User whose Information will be Processed;
- b. Take reasonable steps to ensure that the User whose Information will be Processed is aware of the Information that will be Processed, the source from which that Information will be collected and the purpose for which that Information will be Processed;
- c. Take reasonable steps to ensure that the Information that is Processed is complete, accurate, not misleading and updated where necessary;
- d. Take reasonable technical and organisational measures to secure the integrity and confidentiality of Information that is Processed so as to prevent the loss, damage or unauthorised destruction of Information and the unlawful access to, or Processing of Information; and
- e. Take reasonable steps to ensure that the User whose Information will be Processed is aware of his rights in and to his Information.

#### **4. Processing of Personal Information**

- a. By providing your Personal Information to 3ONE you acknowledge that it has been collected directly from you and consent to its processing by 3ONE.
- b. Where you submit Personal Information (such as name, address, telephone number and email address) via the website (e.g. through completing any online form) the following principles are observed in the processing of that information:
- c. 3ONE will only collect Personal Information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
- d. 3ONE will only process Personal Information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.
- e. Personal Information will only be processed for a purpose compatible with that for which it was collected, unless you have agreed to an alternative purpose in writing or 3ONE is permitted in terms of national legislation of general application dealing primarily with the protection of Personal Information.
- f. 3ONE will keep records of all Personal Information collected and the specific purpose for which it was collected for a period of 1 (one) year from the date on which it was last used.
- g. 3ONE will not disclose any Personal Information relating to you to any third party unless your prior written agreement is obtained or 3ONE is required to do so by law.
- h. If Personal Information is released with your consent 3ONE will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.
- i. 3ONE will destroy or delete any Personal Information that is no longer needed by 3ONE for the purpose it was initially collected, or subsequently processed.
- j. Note that, as permitted by the Electronic Communications and Transactions Act 25 of 2002, 3ONE may use Personal Information collected to compile profiles for statistical purposes. No Information contained in the profiles or statistics will be able to be linked to any specific User.

## **5. Collection of anonymous data**

- a. 3ONE may use standard technology to collect Information about the use of this website. This technology is not able to identify individual Users but simply allows the 3ONE to collect statistics.
- b. 3ONE may utilise temporary or session cookies to keep track of Users' browsing habits. A cookie is a small file that is placed on your hard drive in order to keep a record of your interaction with this website and facilitate User convenience.
- c. Cookies by themselves will not be used to identify Users personally but may be used to compile identified statistics relating to use of services offered or to provide 3ONE with feedback on the performance of this website.
- d. The following classes of Information may be collected in respect of Users who have enabled cookies:
  - The browser software used;
  - IP address;
  - Date and time of activities while visiting the website;
  - URLs of internal pages visited; and
  - Referrers
- e. If you do not wish cookies to be employed to customize your interaction with this website it is possible to alter the manner in which your browser handles cookies. Please note that, if this is done, certain services on this website may not be available.

## **6. Status and Amendments**

- a. 3ONE respects your privacy. This privacy policy statement sets out 3ONE's Information gathering and dissemination practices in respect of the Website.
- b. This Privacy Policy governs the processing of Personal Information provided to 3ONE through your use of the Website.
- c. Please note that, due to legal and other developments, 3ONE may amend these terms and conditions from time to time. The version of the terms and conditions effective for this Privacy Policy are indicated by the effective date incorporated in the title of this Privacy Policy. It is your duty to remain apprised of the current version of this Privacy Policy. The date indicated in the heading of this Privacy Policy is the effective date that governs the browsing and use of this Privacy Policy from that date until the next revision of this Privacy Policy becomes effective.

- d. By continuing to browse or use this Privacy Statement after a revised Privacy Policy becomes effective constitutes your agreement to observe this Privacy Policy as may be revised.

## **7. Security**

- a. 3ONE takes reasonable measures to ensure the security and integrity of Information submitted to or collected by this website but cannot under any circumstances be held liable for any loss or other damage sustained by you as a result of unlawful access to, or dissemination of any Personal Information by a third party.

## **8. Links to other websites**

- a. 3ONE has no control over and accepts no responsibility for the privacy practices of any third-party websites to which hyperlinks may have been provided and 3ONE strongly recommends that you review the privacy policy of any website you visit before using it further.

## **9. Queries**

- a. If you have any queries about this privacy policy please contact us by emailing [contact@3one.co.za](mailto:contact@3one.co.za).