

THE PROTECTION OF PERSONAL INFORMATION ACT **CUSTOMER PRIVACY NOTICE**

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

At Sonja Smith Funeral Group (Pty) Ltd. (and including the company’s website) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

About the Company

Sonja Smith Funeral Group (Pty) Ltd.

The information we collect

We collect and process clients’ personal information mainly to contact them for the purposes of understanding their requirements and delivering services accordingly. For this purpose, we will collect contact details including their name and organisation’s details.

We collect information directly from the client where they provide us with their personal details. Where possible, we will inform them what information they are required to provide to us and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

We collect personal and financial details from suppliers/third parties/employees for the purpose of record keeping and to abide by South African Laws.

How we use your information

We will use clients’ personal information only for the purposes for which it was collected and agreed upon with them.

In addition, where necessary their information may be retained for legal or research purposes.
For example:

- To gather contact information;
- To confirm and verify their identity or to verify that they are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or any other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- To comply with South African Law on legal proceedings;
- In connection with legal proceedings.

Disclosure of information

We may disclose clients' personal information to our service providers who are involved in the delivery of products or services to them. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose clients' information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Information Security

We are legally and ethically obliged to provide adequate protection (appropriate, reasonable technical and organisational measures) for the personal information we hold and to prevent unauthorised/unlawful access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that clients' personal information remains secure.

- Physical security;
 - Burglar Bars at all the ground floor windows.
 - Motion Sensors connected to an armed response company.
 - Electric Fence around the perimeter.
 - Access Controlled gate with a recording camera pointed to it.
- Risk assessment tests;
 - As done by an external provider.
- Maintenance of safeguards;
- Verifying effectiveness of safeguards;
- Access to personal information;
 - Personal information can only be accessed by the relevant employees to be used in the day-to-day operations of the business.
- De-identified data which cannot be reinstated;
- Secure communications;
 - All our communications is done through Zoom (Security Compliance : <https://explore.zoom.us/en/trust/security/>)
 - We use Sage Pastel Partner for all financial functions
- Security in contracting out activities or functions;
 - When using third parties for contracted activities or functions, we ensure they sign an operator's agreement to show that they also comply to the POPI Act.
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents (both internally and externally).

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

We will ensure that anyone to whom we pass clients' personal information agrees to treat their information with the same level of protection as we are obliged to.

If and when any employee of Sonja Smith Funeral Group (Pty) Ltd shares clients' personal information with suppliers or other third parties, the employee will first need to establish from our information officer if they have a POPIA Policy and Procedure protocol in place that has been reviewed and approved by Sonja Smith Funeral Group (Pty) Ltd.'s representative.

The supplier or third party should notify Sonja Smith Funeral Group (Pty) Ltd within reasonable time regarding a breach.

Sonja Smith Funeral Group (Pty) Ltd. must also notify the Regulator and data subject of the breach as soon as reasonably possible by the means deemed necessary by the chief compliance officer.

The notification must include enough information for the data subject so that they know what measures to take to protect themselves against further breaches.

Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on this document and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Correction of your information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

Definition of personal information

According to the Act "personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, the company also includes the following items as personal information:

- All addresses including residential, postal and email addresses.
- Change of name – for which we require copies of the marriage certificate or official change of name document issued by the state department.

How to contact us

If you have any queries about this notice; need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on this document.