

# PRIVACY POLICY

**Emthunzini Financial Services (Pty) Ltd**  
**FSP Number: 54028**

**Last updated: 13 August 2026**

## 1. Introduction

Emthunzini Financial Services (Pty) Ltd ("EFS", "we", "us", "our" or "the Company") respects the privacy and protection of personal information entrusted to us.

This Privacy Policy explains how EFS collects, uses, processes, stores, protects and shares personal information when you:

- visit or use our website;
- contact us;
- submit an online enquiry;
- request information or a quotation;
- apply for a financial product or service;
- communicate with us;
- become a client;
- submit or participate in a claim;
- interact with our representatives or service providers; or
- otherwise provide personal information to EFS.

This Privacy Policy is intended to comply with the applicable requirements of the **Protection of Personal Information Act 4 of 2013 ("POPIA")** and other applicable South African privacy and data-protection requirements.

POPIA establishes conditions for the lawful processing of personal information and protects natural and juristic persons against harm arising from unlawful processing.

## 2. Who We Are

**Emthunzini Financial Services (Pty) Ltd**

**FSP Number: 54028**

**Physical Address:**

35 Newquay Road  
New Redruth  
Alberton  
South Africa

**Telephone:** 087 183 1300

**WhatsApp:** 082 923 6025

**Email:** hello@emthunzinifs.co.za

EFS is a licensed Financial Services Provider and processes personal information in connection with its financial services activities and business operations.

Where EFS acts as a responsible party under POPIA, EFS determines the purposes and means for which personal information is processed.

Depending on the particular service or transaction, another organisation may also process personal information in its own capacity or on behalf of EFS. The applicable roles will depend on the relevant contractual and regulatory arrangements.

## 3. Our Underwriting Relationship

In relation to applicable EFS Legacy Shield arrangements, EFS works with:

**Anayasure Underwriting Managers**  
**FSP Number: 52695**

Anayasure Underwriting Managers may process personal information in connection with underwriting, policy administration and other functions associated with the applicable product arrangements.

The respective responsibilities of EFS, Anayasure Underwriting Managers and the applicable insurer are determined by the relevant contractual, regulatory and product arrangements.

Where another organisation acts as a responsible party in its own right, that organisation's own privacy policy may also apply.

#### **4. What Is Personal Information?**

For purposes of this Privacy Policy, personal information broadly refers to information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person.

Depending on your relationship with EFS, this may include:

- name and surname;
- identification or passport information;
- date of birth;
- age;
- gender;
- residential address;
- postal address;
- email address;
- telephone number;
- WhatsApp number;
- employment information;
- financial information;
- banking information;
- income information;
- information relating to financial products;
- policy information;
- beneficiary information;
- dependant information;
- claims information;
- communication records;
- photographs or recordings where applicable;
- information contained in supporting documents; and
- other information reasonably required for a lawful business or regulatory purpose.

We will seek to collect information that is relevant to the purpose for which it is required.

#### **5. Special Personal Information**

Certain financial services and insurance-related processes may involve information that is classified as **special personal information** under POPIA.

Depending on the service, this may include information such as:

- health or medical information;
- biometric information;
- information relating to criminal behaviour where legally relevant;
- information concerning other specially protected categories; and
- other information classified as special personal information under applicable law.

EFS will only process special personal information where permitted by POPIA or another applicable legal basis.

Where appropriate, additional safeguards, consent requirements or contractual arrangements may apply.

## **6. Children's Information**

EFS may process information relating to children where this is necessary for a lawful purpose, including where a child is a dependant or beneficiary of a financial product or where information is required for policy administration or claims purposes.

Children's personal information is subject to the additional protections provided by POPIA.

EFS will only process children's personal information where permitted by applicable law and will take appropriate measures to protect it.

Where required, information will be provided or consent obtained from a competent person or other legally authorised person.

## **7. Information We Collect**

EFS may collect personal information through several channels.

### **Information you provide directly**

This may occur when you:

- complete a website form;
- request a quotation;
- request a callback;
- contact us by telephone;
- contact us by email;
- communicate through WhatsApp;
- submit an application;
- provide documentation;
- submit a claim; or
- communicate with an EFS representative.

### **Information collected through business processes**

We may also obtain information in connection with:

- financial advice;
- product applications;
- policy administration;
- claims;
- customer service;
- regulatory requirements;
- compliance checks;
- fraud prevention; and
- other legitimate business activities.

### **Information received from other sources**

Where lawful and appropriate, EFS may receive information from third parties, including:

- insurers;
- underwriting managers;
- product providers;
- service providers;
- authorised representatives;
- administrators;
- regulatory bodies;
- verification providers; and
- other persons or organisations where permitted by law.

Where POPIA requires us to notify you of the source of information that was not collected directly from you, we will take reasonably practicable steps to do so. Section 18 of POPIA specifically addresses notification when personal information is collected.

## 8. Information Collected Through the Website

When you visit the EFS website, certain technical information may be collected automatically, depending on the website's configuration.

This may include:

- IP address;
- browser type;
- device type;
- operating system;
- pages visited;
- date and time of visits;
- referring website;
- approximate location derived from technical information; and
- website usage information.

This information may be used for:

- website security;
- troubleshooting;
- improving website functionality;
- understanding website usage;
- technical administration;
- analytics; and
- preventing misuse.

The exact information collected will depend on the technologies and services deployed on the website.

## 9. Cookies

The EFS website may use cookies and similar technologies.

Cookies are small files or identifiers that may be stored on your device when you visit a website.

Depending on their purpose, cookies may assist with:

- website functionality;
- remembering preferences;
- security;
- website performance;
- analytics; and
- understanding how visitors interact with the website.

Where applicable, EFS will provide appropriate information or controls regarding cookies.

You may also be able to manage cookies through your browser settings.

Disabling certain cookies may affect the functionality of parts of the website.

**Note:** Before publication, EFS should confirm the specific cookies, analytics tools, advertising technologies and third-party tracking services actually installed on the website and update this section accordingly.

## **10. Why We Collect Personal Information**

EFS collects and processes personal information for specific, lawful and legitimate purposes.

These purposes may include:

### **Financial services**

To:

- provide financial advice;
- provide intermediary services;
- understand client needs;
- provide quotations;
- process applications;
- administer financial products;
- service clients; and
- provide ongoing support.

### **Client administration**

To:

- communicate with clients;
- maintain client records;
- manage enquiries;
- provide customer support;
- update client information; and
- maintain appropriate records.

### **Product administration**

Where applicable, personal information may be processed for:

- underwriting;
- policy administration;
- premium administration;
- claims administration;
- benefit fulfilment;
- verification;
- servicing; and
- related activities.

### **Regulatory compliance**

To comply with applicable:

- financial services legislation;
- regulatory requirements;
- tax obligations;
- anti-fraud requirements;
- record-keeping requirements;
- court orders;
- lawful requests from regulators; and
- other legal obligations.

### **Security and fraud prevention**

To:

- detect and prevent fraud;
- protect EFS systems;
- verify identities;
- prevent unauthorised activity; and
- protect clients and EFS against unlawful activity.

#### **Marketing and communication**

Where lawful and subject to applicable consent requirements, EFS may use personal information to:

- communicate information about products and services;
- send relevant updates;
- conduct marketing;
- invite clients to events or campaigns; and
- provide other relevant communications.

#### **11. Lawful Basis for Processing**

EFS will process personal information only where permitted by POPIA or another applicable legal basis.

Depending on the circumstances, processing may be necessary because:

- you have consented to the processing;
- processing is necessary to take steps requested by you before entering into a contract;
- processing is necessary for the performance of a contract;
- processing is required by law;
- processing protects a legitimate interest recognised by law; or
- another lawful basis under POPIA applies.

Consent will not be requested where another lawful basis legitimately permits the processing.

Where consent is relied upon, you may generally withdraw that consent, subject to legal or contractual limitations and the consequences explained at the time of withdrawal.

#### **12. Is Providing Personal Information Mandatory?**

Whether you are required to provide personal information depends on the purpose for which it is being collected.

Some information may be:

##### **Voluntary**

For example, information provided when making a general enquiry.

##### **Necessary**

Certain information may be necessary to:

- provide a quotation;
- assess an application;
- provide financial advice;
- enter into a contract;
- administer a financial product;
- process a claim; or
- comply with a legal obligation.

If you do not provide information that is reasonably required for these purposes, EFS may be unable to provide the requested service or complete the relevant transaction.

Where required by POPIA, EFS will take reasonable steps to explain the consequences of failing to provide required information.

### **13. Accuracy of Personal Information**

EFS takes reasonably practicable steps to ensure that personal information in its possession is:

- complete;
- accurate;
- not misleading; and
- updated where necessary.

POPIA specifically requires responsible parties to take reasonably practicable steps to maintain information quality.

You should notify EFS if your personal information changes or if you believe information held by EFS is incorrect.

### **14. Sharing Personal Information**

EFS may share personal information where lawful and reasonably necessary for the purposes described in this Privacy Policy.

Recipients may include:

- insurers;
- underwriting managers;
- financial product providers;
- administrators;
- claims administrators;
- approved service providers;
- technology providers;
- hosting providers;
- payment providers;
- professional advisers;
- auditors;
- compliance providers;
- legal advisers;
- regulators;
- government authorities;
- fraud-prevention providers; and
- other parties where permitted or required by law.

EFS will seek to ensure that personal information is only disclosed where there is an appropriate lawful basis.

### **15. Anayasure Underwriting Managers**

Where relevant to an EFS Legacy Shield product, personal information may be shared with:

#### **Anayasure Underwriting Managers (FSP 52695)**

This may be necessary for activities such as:

- underwriting;
- policy administration;
- claims processing;

- product administration;
- compliance;
- servicing; and
- other functions associated with the relevant product arrangement.

The applicable insurer may also receive and process personal information in accordance with the relevant policy and privacy arrangements.

#### **16. Third-Party Service Providers**

EFS may appoint third-party service providers to perform services on its behalf.

These providers may include:

- technology providers;
- website providers;
- hosting providers;
- communication providers;
- document-management providers;
- payment providers;
- marketing providers;
- customer-support providers;
- claims-related providers; and
- other professional or operational service providers.

Where a service provider processes personal information on behalf of EFS, EFS will take appropriate steps to require the service provider to maintain appropriate confidentiality and security measures.

#### **17. Regulatory and Legal Disclosures**

EFS may disclose personal information where required or permitted by law.

This may include disclosure to:

- the Financial Sector Conduct Authority;
- the Information Regulator;
- other regulatory authorities;
- courts;
- law-enforcement agencies;
- tax authorities;
- statutory bodies; and
- other competent authorities.

Disclosure will be limited to what is required or permitted for the relevant lawful purpose.

#### **18. Fraud Prevention**

EFS may process personal information to detect, prevent and investigate:

- fraud;
- identity theft;
- money laundering;

- misrepresentation;
- unlawful applications;
- unauthorised transactions; and
- other unlawful activities.

Where appropriate and lawful, information may be shared with relevant fraud-prevention organisations, financial institutions, insurers, underwriting managers, regulators or law-enforcement authorities.

## **19. Marketing**

EFS may communicate information about its products and services where permitted by law.

Marketing communications may be sent through:

- email;
- SMS;
- telephone;
- WhatsApp;
- social media; or
- other lawful communication channels.

Where consent is required, EFS will obtain the necessary consent.

You may request that EFS stop sending direct marketing communications to you.

Stopping marketing communications will not necessarily prevent EFS from sending important service, policy, contractual or regulatory communications.

## **20. WhatsApp Communications**

EFS may use WhatsApp as a communication channel where appropriate.

If you choose to communicate with EFS through WhatsApp, information may be processed through WhatsApp's systems and subject to WhatsApp's own terms and privacy practices.

You should avoid sending highly sensitive information through WhatsApp unless EFS specifically requests it or provides an appropriate secure process.

## **21. Information Security**

EFS takes reasonable technical and organisational measures to protect personal information against:

- loss;
- damage;
- unauthorised access;
- unlawful processing;
- alteration;
- disclosure;
- destruction; and
- other reasonably foreseeable risks.

Security measures may include:

- access controls;
- password protection;
- system monitoring;
- secure communications;
- user access restrictions;
- physical security;
- confidentiality obligations; and
- appropriate organisational controls.

No electronic system can be guaranteed to be completely secure.

## **22. Data Breaches**

If EFS experiences a security compromise involving personal information, EFS will take appropriate steps in accordance with applicable law.

Where POPIA requires notification of a security compromise, EFS will notify the affected data subjects and/or Information Regulator in accordance with the applicable legal requirements.

## **23. Retention of Personal Information**

EFS will retain personal information only for as long as reasonably necessary for the purposes for which it was collected, or for as long as required or permitted by:

- applicable law;
- regulatory requirements;
- contractual obligations;
- legitimate business requirements;
- dispute resolution; or
- other lawful purposes.

The retention period may vary depending on the type of information and the purpose for which it is processed.

When personal information is no longer required, EFS will take reasonable steps to securely delete, destroy or anonymise it where appropriate and lawful.

## **24. Cross-Border Transfers**

EFS may use service providers or technology systems that involve the processing or storage of personal information outside South Africa.

Where personal information is transferred outside South Africa, EFS will take appropriate steps to ensure that the transfer is conducted in accordance with POPIA and applicable law.

This may include assessing whether the recipient jurisdiction provides an adequate level of protection or whether another lawful basis or safeguard applies.

POPIA contains specific requirements governing transfers of personal information to third parties in foreign countries.

## **25. Automated Decision-Making**

EFS does not intend to make decisions affecting clients solely through automated processing unless permitted by applicable law and appropriate safeguards are in place.

Where automated decision-making is used in a particular process and POPIA requires additional protections or information, EFS will take the appropriate measures.

## **26. Your Rights as a Data Subject**

Subject to applicable law and any lawful limitations, you have rights under POPIA concerning your personal information.

These may include the right to:

- request access to personal information held about you;
- request correction of inaccurate information;
- request updating of information;
- request deletion where legally permissible;
- object to certain processing;
- withdraw consent where processing is based on consent;
- object to direct marketing;
- request information regarding processing;
- lodge a complaint regarding the processing of your personal information; and
- exercise other rights available under POPIA.

POPIA recognises data-subject participation rights concerning access, correction, objection and related matters.

## **27. Access to Personal Information**

You may request access to personal information held by EFS about you.

Requests must be submitted through the applicable EFS process and may be subject to the requirements and limitations of POPIA and PAIA.

The Information Regulator confirms that PAIA provides a framework for requesting access to records held by private bodies, including records containing personal information.

Please refer to the **EFS PAIA Manual** for information about submitting a formal request.

## **28. Correction or Deletion of Information**

If you believe that EFS holds personal information that is:

- inaccurate;
- incomplete;
- outdated;
- misleading; or
- unlawfully processed,

you may request that EFS correct, update or delete the information where permitted by law.

EFS may retain information where it is legally required or entitled to do so.

## **29. Objection to Processing**

You may have the right to object to the processing of your personal information in circumstances provided for by POPIA.

Any objection should be submitted to EFS in writing and should identify:

- the information concerned;
- the processing to which you object;
- the reason for the objection; and
- any supporting information.

EFS will consider the objection in accordance with applicable law.

### **30. Withdrawal of Consent**

Where processing is based on your consent, you may withdraw your consent.

Withdrawal of consent will not:

- invalidate processing that took place lawfully before withdrawal;
- necessarily stop processing required by law; or
- necessarily terminate contractual or regulatory obligations.

If withdrawal prevents EFS from performing a service or complying with a legal obligation, EFS will explain the relevant consequences where appropriate.

### **31. Direct Marketing Objection**

You may object to receiving direct marketing communications from EFS.

Where applicable, you can use the unsubscribe or opt-out mechanism included in the communication or contact EFS directly.

Important policy, contractual, regulatory or service communications may still be sent where necessary.

### **32. Complaints About Personal Information**

If you believe that EFS has processed your personal information unlawfully or inappropriately, you are encouraged to contact EFS first so that we can investigate and attempt to resolve the matter.

You may also have the right to lodge a complaint with the **Information Regulator South Africa**.

The Information Regulator is responsible for monitoring and enforcing compliance with POPIA and PAIA.

The Information Regulator provides mechanisms for complaints and other POPIA/PAIA matters through its official channels.

### **33. Information Officer**

EFS will maintain an appropriately appointed **Information Officer** in accordance with applicable requirements.

The Information Officer is responsible for overseeing EFS's compliance with applicable information-protection requirements and assisting with requests and queries concerning personal information.

## Information Officer Contact

**Thulasizwe Nyandeni**

**Email:** nyandeni@telkomsa.net

The Information Regulator provides an eServices platform for registration and management of Information Officers and PAIA/POPIA compliance matters.

## 34. PAIA Manual

EFS maintains a **PAIA Manual** which provides information regarding:

- EFS records;
- information categories;
- access procedures;
- relevant contacts;
- applicable forms;
- applicable fees; and
- other information required under PAIA.

The EFS PAIA Manual is available through the **Support & Legal** section of the website.

The Information Regulator states that private bodies are required to make their PAIA Manuals available and provides official templates and resources for this purpose.

## 35. Third-Party Privacy Policies

Where EFS links to or uses third-party platforms, those platforms may have their own privacy policies.

This may include:

- WhatsApp;
- social media platforms;
- payment providers;
- insurers;
- underwriting managers;
- technology providers;
- analytics providers; and
- other third-party services.

EFS's Privacy Policy does not govern the independent processing activities of third parties acting in their own capacity.

You should review the applicable third-party privacy policy where appropriate.

## 36. Changes to This Privacy Policy

EFS may update this Privacy Policy from time to time to reflect:

- changes in legislation;
- regulatory requirements;
- changes to EFS's business;

- changes to website functionality;
- changes to technology;
- changes to information-processing activities; or
- other relevant developments.

The latest version will be published on the EFS website with the applicable **Last Updated** date.

Where a material change affects how personal information is processed, EFS will take appropriate steps to communicate the change where required.

### **37. Relationship With Other EFS Documents**

This Privacy Policy should be read together with:

- Website Terms & Conditions;
- PAIA Manual;
- Complaints & Disclosure;
- FAIS/FSP Disclosure; and
- applicable product or policy documentation.

Where a specific product or service contains additional privacy provisions, those provisions should be read together with this Privacy Policy.

Nothing in this Privacy Policy limits rights or protections available under applicable law.

### **38. Applicable Law**

This Privacy Policy is governed by the laws of the **Republic of South Africa**.

The processing of personal information by EFS will be conducted in accordance with applicable South African data-protection and privacy legislation.

### **39. Contact EFS**

If you have questions about this Privacy Policy, your personal information or how EFS processes personal information, please contact us.

#### **Emthunzini Financial Services (Pty) Ltd**

**FSP Number:** 54028

**Physical Address:**  
35 Newquay Road  
New Redruth  
Alberton  
South Africa

**Telephone:** 087 183 1300  
**WhatsApp:** 082 923 6025  
**Email:** hello@emthunzinifs.co.za

#### **Underwriting Partner**

**Anayasure Underwriting Managers**  
**FSP Number:** 52695

Where your query relates specifically to the processing of personal information by another responsible party, including an insurer or underwriting manager, EFS may direct you to the appropriate privacy contact for that organisation.

#### **40. Important Privacy Notice**

By providing personal information to EFS, you acknowledge that EFS may process that information for lawful purposes connected with its business, financial services, client administration, regulatory obligations, product administration, claims, communication and other purposes described in this Privacy Policy.

Where required by law, EFS will obtain appropriate consent or rely on another lawful basis for processing.

**You are encouraged to read this Privacy Policy together with the EFS Website Terms & Conditions and PAIA Manual.**

**Emthunzini Financial Services (Pty) Ltd**

**FSP 54028**

*Your Finance. Your Future. Our Focus.*

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