DIRECT MARKETING POLICY OF PLATINUM LIFE

1. Introduction

1.1 Platinum Life primarily markets its products telephonically to prospective policy owners who are already on the Platinum Life database and/or intermittently to persons who have responded to social media advertising.

1.2 Platinum Life's telephonic interactions is a form of Direct Marketing and this policy provides guidance as to how our Direct Marketing complies with the Protection of Personal Information Act 4 of 2013 ("POPIA") and the Financial Advisory and Intermediary Services Act 37 of 2002("FAIS").

1.3 Platinum Life is an Authorised Financial Services Provider ("FSP") with number 5394 and is also subject to the following laws which are of relevance to this Direct Marketing Policy:

1.3.1 Financial Intelligence Centre Act 38 OF 2001 ("FICA")

1.3.2 Insurance Act 18 of 2017

1.3.3 Promotion of Access to Information Act 2 of 2000 ("PAIA") and

1.3.4 The FAIS General Code of Conduct for Authorised Financial Services Providers and Representatives("GCOC").

2. Understanding when consent is required

2.1 Unsolicited direct marketing by electronic means such as automatic calling machines, SMS or e-mail is limited to a single instance unless the Responsible Party has obtained consent from the data subject or unless the data subject is already a customer of the Responsible Party.

Platinum Life may thus only engage a prospective customer once, via electronic means, for the purpose of Direct Marketing.

2.2 A customer that has previously consented to the further processing of his or her Personal Information has the right to withdraw such consent and may do so by providing Platinum Life with such notice to our Information Officer.
A customer may, furthermore, object on reasonable grounds to the further processing of Personal Information relating to him or her.

3. Platinum Life adheres to POPIA's 8 conditions for the lawful processing of Personal Information when marketing its products to potential customers:

3.1 Accountability - Platinum Life ensures that the conditions for lawful processing of Personal Information as set out in the Act, and all measures that give effect to these conditions, are complied with before and during processing.

3.2 Processing Limitation - Personal Information is processed lawfully and in a manner that does not infringe upon the data subject's privacy. Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.

3.3 Purpose Specification - Personal Information is collected for a specific purpose only and prospective customers must be aware of the purpose for which the information is obtained. Records of Personal Information are not retained for any longer than is necessary for achieving the purpose for which the information was collected.

3.4 Further processing limitation - Platinum Life will only process Personal Information in accordance with the purpose for which the information was collected.

3.5 Information Quality - Platinum Life will ensure that Personal Information is complete, accurate, not misleading and updated as required. Section 8 of Platinum Life's Privacy Policy provides further information.

3.6 Openness - Platinum Life will endeavour to be open and honest about why we need a prospective customer's Personal Information and how we intend to use and process this information.

3.7 Security Safeguards - Platinum Life secures the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable, technical and organisational measures to prevent any loss, damage or destruction of Personal Information and the unlawful access to or processing of Personal Information. Section 7 of Platinum Life's Privacy Policy provides further information.

3.8 Data Subject Participation - Data subjects have the right to access all their Personal Information and also to request for the correction, removal and deletion of their Personal Information. Section 11 of Platinum Life's Privacy Policy outlines your rights as a data subject.

4. Systems and Procedures

4.1 Platinum Life records all telephonic conversations with data subjects in the course of direct marketing and has appropriate systems and processes in place to store and retrieve such recordings.

4.2 Platinum Life will at the earliest reasonable opportunity after conclusion of a transaction provide, in writing, the data subject with all information as discussed telephonically together with the necessary disclosures.