

Actuarial Society of South Africa

Member Privacy policy

1. Introduction and Scope of Privacy Policy

- 1.1. We are the Actuarial Society of South Africa (**ASSA**). We respect your privacy and take the protection of personal information seriously.
- 1.2. This Privacy Policy applies to and describes how we collect, use, disclose, store, protect and/or destroy your Personal Information (as defined below).
- 1.3. This Privacy Policy applies to members (**you**) and your existing membership (including members at all levels to which ASSA provides services) and all activities related to your membership.

2. What is personal information?

- 2.1. **Personal information** includes any information about you as an identifiable living person such as your:
 - name and surname,
 - age,
 - date of birth,
 - home address,
 - postal address,
 - email address or phone number,
 - social media or any public profile such as LinkedIn,
 - any professional sanctions or findings against you,
 - gender,
 - marital status,
 - employment history,
 - personal opinions/views/preferences of the person (especially if collected via surveys etc.),
 - qualification status,
 - admission to accredited universities,
 - academic records;
 - physical location,
 - profile pictures and,
 - any information that when combined with other information may identify you.

- 2.1.1. **Device and device event information** includes your:
 - IP address,
 - unique device identifier,

- the nature of the access device you use to access ASSA's website,
- the geographic location from which you access our website,
- hardware model and settings,
- operating system type and version,
- browser language,
- system activity, and,
- crashes.

We may collect this information when you access any of our online materials.

2.1.2. Log information includes:

- your site activity information, such as details like how, when, and for how long you access our website,
- the links you click on and content you access, and
- the time spent on the specific content.

We may automatically collect and store this information in server logs when you access our website.

2.2. Personal information excludes:

- information that has been made anonymous so that it does not identify a specific person,
- permanently de-identified information that does not relate or cannot be traced back to you specifically (re-identified), or
- non-personal statistical information collected and compiled by us or anyone else on our behalf.

2.3. Special personal information includes personal information about:

- **sensitive demographic information** – such as your race or ethnicity,
- **beliefs** – such as your political, religious or philosophical beliefs,
- **employment information** – specifically your trade union membership,
- **criminal information** – such as your criminal behaviour, alleged commission of any offence or criminal proceedings related to it or involving you,
- **health and/or biometric information** – such as information required for purposes of applying for special concessions and/or information submitted by you for event attendance purposes; and
- **children's information** – such as personal information that you provide us with about anyone under the age of 18.

We may collect this information when you access any of our online materials.

3. Acceptance

- 3.1.** You accept all the terms of this policy when you submit your personal information to us, apply for membership or request our services. Acceptance and compliance with this policy is a requirement of membership. If you do not agree with anything in this policy, then you might not be able to continue your membership with ASSA or use our services.

- 3.2.** By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all its terms.
- 3.3.** You may only send us your own personal information or the information of another person where you have their permission to do so.

4. When will we process your personal information?

- 4.1.** We process your personal information when you:
- apply to be a member of ASSA,
 - contact us (including by email or telephonically), with any queries;
 - make use of our services and access our website;
 - register to receive any notifications from us regarding your membership, or
 - submit your personal information to us for any other reason.

5. How do we collect your personal information?

We may collect your personal information:

- on submission, registration, or request,
- from your access device when you use our website,
- from your browser,
- from our affiliates and third parties,
- that you voluntarily submit it to us, or
- through marketing activities such as events.

5.1. On submission, registration, or request

- 5.1.1.** When you submit personal information, you will no longer be anonymous to us. We may collect personal information from you by asking you specific questions and permitting you to communicate directly with us, for example, via email, feedback forms, site comments, and forums.
- 5.1.2.** When you request our services, you may be asked to provide us with additional information on a voluntary basis.
- 5.1.3.** We will use your personal information to register and maintain your membership with ASSA, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this Policy.

5.2. From your access device

- 5.2.1.** We passively collect some of your personal information from the access device you use to access and navigate through the website, using various technological means, such as server logs, to collect and maintain log information.

- 5.2.2. We also use cookies and anonymous identifiers, which enable our computer system to recognise you when you next visit the website. This distinguishes you from other users, improves our service to you, makes the website more user-friendly, and gives you a more personalised experience.
- 5.2.3. A cookie is a small piece of data (an alphanumeric identifier) that our computer system transfers to your access device through your web browser when you visit the website. It is stored in your web browser. When you revisit the website, the cookie allows the website to recognise your browser. Cookies may store user preferences and other information.
- 5.2.4. You may turn off cookies by configuring your browser to refuse all cookies or indicate when a cookie is being sent. However, if you do so, you may only be able to enjoy some of the website's features and functionality.

5.3. From our affiliates and third parties

- 5.3.1. We may receive or request your personal information from our affiliates or third parties. We will only use that personal information to maintain your membership or provide services to you.

5.4. From the browser

- 5.4.1. We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**).
- 5.4.2. Please note that other websites visited before entering our website might place personal information within your URL during a visit, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

5.5. Optional details

- 5.5.1. You may also provide us with additional information on a voluntary basis (**optional information**). This includes content that you decide to upload or download from our website or when you take advantage of promotions, respond to surveys, request additional services, or

otherwise use our website's optional features and functionality.

6. How do we use your personal information?

6.1. We may use your personal information for the purposes that you indicated when you agreed to provide it to us. **Processing** includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

6.1.1. **service purposes** – such as:

- registering and maintaining your membership with ASSA in general including;
 - subscription, renewal, reinstatement, transfer, or termination of membership;
 - assisting with exemptions, examinations, work-based learning or academic workshops or initiatives;
- provide you with access to our services;
- issuing practising certificates, critical skills letters, and letters of good standing, where required;
- retaining and making any membership information available to you;
- verifying your details and authenticating your identity;
- facilitating any payments by you regarding your membership with ASSA, where applicable;
- helping us in any future dealings with you;
- keeping our records and information up to date;
- better understanding of our members' needs; and
- providing support to our members.

6.1.2. **business purposes** – such as:

- the security and administration of ASSA;
- internal audit and accounting;
- business planning and due diligence, or other proposed and actual transactions;
- keeping records of our communications with you and your communications with us;
- compiling, using, and disclosing non-personal statistical information about our members; and
- other activities or purposes that are lawful, reasonable, adequate, relevant, and not excessive in relation to our services, the association's functions and activities, and other purposes for which it was collected.

6.1.3. **marketing purposes but only for purposes of performing ASSA services** – such as:

- compiling and using statistical information about you and other members for research, development, or marketing;
- providing you with any industry-related publications and newsletters;

- events, training and continuous professional development opportunities; and
- informing you about any changes to the website, the association, this Privacy Policy, or other relevant changes.

6.1.4. **legal purposes** – such as:

- complying with law, regulations, legal process or pursuing good governance;
- enforcing or applying our membership terms or any other contract between you and us;
- protecting our rights, property, or safety or that of our members, employees, contractors, agents, dealers or any third party;
- detecting, preventing, or dealing with actual or alleged fraud, security or technical issues or the abuse, misusing or unauthorised use of our site or contravening agreements between us and you; and
- enforcing any other rights ASSA may have against you in law.

7. Our use of your personal information

7.1. We will use your personal information to fulfil ASSA's legitimate interests.

7.2. Where we rely on our legitimate interests to use your information, our legitimate interests include:

- 7.2.1. preventing misrepresentation or fraud (e.g. if an unauthorised person purports to be a member of ASSA or designated as an actuary),
- 7.2.2. providing a directory for members of the public to verify membership status for security purposes,
- 7.2.3. our internal security purposes, or
- 7.2.4. our internal business purposes.

7.3. In some instances, we may obtain your consent to process your personal information, but we will do so in accordance with applicable law.

8. Reasons we share your personal information

We will only share your personal information for the purposes set out in this Privacy Policy.

8.1. ASSA may share your personal information:

- 8.1.1. with our employees, service providers, contractors, and agents if and to the extent that they need to know that information to provide services for or to us (such as hosting, development and administration, technical support, and other support services). Third parties may only process

personal information on our behalf by entering into written agreements with us that govern our relationship with them and contain confidentiality and non-disclosure provisions. Such persons may be disciplined, their contracts terminated, or other appropriate action taken if they fail to meet their obligations;

- 8.1.2. credit bureaus to report account information, as permitted by law;

8.2. Regulatory bodies and Government agencies

- 8.2.1. We may disclose your personal information, such as the status of your practice certifications, to governmental agencies, exchanges, and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary.
- 8.2.2. If you provide false or deceptive information about yourself or misrepresent yourself as someone else, we may proactively disclose such information to the appropriate regulatory bodies or commercial entities.

8.3. International Institutions

We will disclose and/or obtain your personal information, such as the status of your membership with international institutions with whom we have a mutual recognition agreement or if we reasonably believe such action is necessary.

8.4. Employers

- 8.4.1. We may disclose your personal information, including the status of your membership and academic record, to your employer if we are required to do so by law or if we reasonably believe that such action is necessary.
- 8.4.2. Where your employer is an Actuarial Training Office, we may disclose your personal information to verify and confirm your membership status with the training officer.

8.5. Recruitment agencies

We may disclose your personal information to recruitment agencies to confirm your membership status and good standing if we are required to do so by law or if we reasonably believe such action is necessary.

8.6. Universities

- 8.6.1. We may disclose your personal information to the administration offices of ASSA accredited universities:
- to confirm your accreditation standing;
 - for financial awards such as ASSA providing university funding to

student members; or

- to confirm your membership status and good standing if we are required to do so by law or if we reasonably believe such action is necessary.

8.7. Law enforcement

8.7.1. We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our terms.

8.8. Other third parties

We may share your personal information with any other third party, where appropriate or required by law.

8.9. On request

We may disclose your personal information to members of the public or other third parties upon request. To better protect you and safeguard your personal information, we take steps to verify these third parties' identities and follow our internal request procedures to ensure a legitimate purpose exists for sharing information before granting them access to your personal information.

8.10. Transfers to third parties in other countries

In certain instances, ASSA may transfer personal information to third parties in a country outside of South Africa when such transfer of your personal information is required for the administration of your membership or to facilitate any transfers of funds. Where ASSA transfers your Personal Information to third parties outside of South Africa, we will endeavour to ensure that such third party has put measures in place that will adequately protect your personal information, in accordance with applicable data protection laws, and our agreements with them.

9. Storage of your personal information

9.1. We store your personal information:

9.1.1. on our servers; or

9.1.2. on the servers of our third-party service providers, such as IT systems or hosting service providers.

10. Security

10.1. We take the security of personal information very seriously and always do our best to comply with applicable data protection laws by maintaining reasonable

measures to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration, and destruction.

10.2. We take appropriate, reasonable technical and organisational measures to secure the integrity of personal information and prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

10.3. We also create a backup of your information for operational and safety purposes.

10.3.1. You acknowledge and accept that there is no such thing as 'perfect security' as technology is not absolutely secure, and there is a risk that your personal information will not be secure when it is processed. We do not guarantee that we can keep your personal information completely secure.

10.3.2. We will use all reasonable endeavours to ensure our website, and your information are not compromised. However, we cannot guarantee that no harmful code will enter our website (for example, viruses, bugs, trojan horses, spyware, or adware). You should be aware of the risks associated with using websites.

10.3.3. If you experience a problem or loss caused by information you provided to us, your computer being compromised in some way, or something beyond our control, we cannot take responsibility for causing the problem. We will, however, do our best to help you if we can.

11. Retention of your personal information

11.1. We may keep your personal information for the duration of your membership and as long as reasonably necessary to fulfil the purposes set out in this policy. We will only destroy your personal information if you have asked us to do so.

11.2. However, we may keep some or all of your personal information if:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes;
- you consent to us keeping it for a specified further period; and
- it is permitted by law.

11.3. During the retention period, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

12. No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this Privacy Policy.

13. Your rights

- 13.1.** Where required by law, we take reasonable steps to ensure that your personal information is accurate, complete, not misleading, and up to date. From time to time, we may request that you update your personal information.
- 13.2.** You can request access to your personal information and ask us to correct the personal information ASSA holds on you. To find out what personal information we have on you or to correct or update your personal information, please email us at information_officer@actuarialsociety.org.za
- 13.3.** You can request that ASSA delete or destroy the personal information that we hold by emailing us using the above address.
- 13.4.** Where we rely on consent to lawfully process your personal information, you may withdraw your consent at any time. Please note that if you do so, we will assess your request to ascertain if we are still able to provide you with services.
- 13.5.** You may object to ASSA processing your personal information and request that we stop processing it at any time. Please note that if you do so, we might not be able to provide you with services.
- 13.6.** Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access, or making any corrections to your personal information or enforcing any other of your rights. This is to ensure that your personal information is not disclosed to an unauthorised person.

14. Changes to this Privacy Policy

- 14.1.** From time to time, we may revise this Privacy Policy to reflect changes in the law or changes in our practices when processing personal information. If we decide to change this Privacy Policy, the changes will be posted on our member website, or we may send you an email detailing the changes we have made and indicating the date that they were last updated.
- 14.2.** If you do not agree with the changes, you must stop using our website and services and discontinue your membership with ASSA. If you continue to use the website and services or continue your membership with ASSA following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

- 14.3.** We are not responsible for, give no warranties, nor make any representations regarding the privacy policies or practices of linked or third-party websites.

15. Queries

- 15.1.** If you have questions about our Privacy Policy, please contact us at information_officer@actuarialsociety.org.za
- 15.2.** If you feel that we are not complying with our data protection obligations, you have the right to complain to the Information Regulator. You can contact the Information Regulator at POPIAComplaints@inforegulator.org.za.