

Privacy notice

FundsAtWork Umbrella Pension Fund
FundsAtWork Umbrella Provident Fund
Momentum Corporate Pension Preservation Fund
Momentum Corporate Provident Preservation Fund
(the Funds)

The purpose of this notice

Having peace of mind that your and your beneficiaries' personal information is safe is important. We understand this and we are committed to keeping it safe and confidential and to comply with the Protection of Personal Information Act 4 of 2013 (POPIA) when processing your personal information.

The purpose of this notice is to let you know how and why the Funds will use and disclose your personal information, what your rights and responsibilities are when providing your personal information to us, and what our responsibilities are to comply with POPIA to keep your personal information safe.

In this notice, where we use the word "your", it includes reference to both you and your beneficiaries.

What type of personal information do the Funds collect?

The Funds, or a third party appointed by the Funds, may collect the following types of personal information relating to you:

- Your name and surname, date of birth, identity number and passport number
- Contact details such as your email address, telephone number and physical address
- Demographic information such as your age and gender
- Information relating to your education, financial, criminal or employment history
- Your annual salary and banking details
- Marital status
- Private correspondence sent by you
- Your race or ethnic origin
- Trade union membership
- Information relating to your physical or mental health and disability.

How the Funds collect your personal information

When personal information is collected, the Funds will indicate the purpose for the collection and whether the information required is compulsory or voluntary.

The Funds will collect personal information directly from you or your beneficiaries, but may also collect your personal information from your employer, or through financial services intermediaries, or from

third parties appointed by the Funds to collect information on their behalf, in the following circumstances:

- When it is not reasonably possible to collect it directly from you based on the circumstances of the particular case;
- When collection of the personal information from another source will not prejudice any of your legitimate interests;
- Where you have consented to the collection from another source;
- When direct collection could prejudice a lawful purpose of the collection; or
- When collection from another source is necessary to maintain the legitimate interests of the Funds.

If personal information was not obtained directly from you, the Funds will disclose the source from which it was obtained if reasonably possible and the Funds will take all reasonable steps to confirm that the personal information is correct.

How the Funds may process your personal information

The Funds will only collect, record, receive, use, collate, store, distribute, update, modify, retrieve, transmit, distribute, disclose, merge, erase and/or destroy your personal information in the following circumstances:

- If you consented to it, for example where the Funds are fulfilling a transaction on your request, like an investment switch instruction;
- If it is necessary for the conclusion or performance of a contract to which you are a party;
- To comply with an obligation imposed by law on the Funds, for example for audit and recordkeeping purposes in accordance with the Pension Funds Act and other applicable laws, or for the payment of any applicable taxes to the South African Revenue Services;
- If it protects your legitimate interests, for example to confirm, verify and update your membership details; to pay benefit claims, for underwriting of risk benefits; to provide information to invest your retirement savings; or to provide guidance to you on any benefit options offered by the Funds;
- If it is necessary for pursuing the legitimate interests of the Funds or a third party to whom the personal information is supplied; or
- For historical, statistical or research purposes.

The Funds will take all steps that are reasonably possible to ensure that you are informed of the purpose for which your personal information is collected, the period for which the personal information will be stored, and if the personal information will be transferred to another country.

If, for any reason, you think that your personal information is not being processed in a correct manner, or that your personal information is being used for a purpose other than what it was originally intended for, you can contact the Funds' Information Officer on the contact details below or lodge a complaint to the Information Regulator at POPIAComplaints@inforegulator.org.za.

The Funds' Information Officer's contact details	
Name	Virgo Abrahams
Telephone	087 742 7603
Email	mebcompliance@momentum.co.za

When the Funds may share your personal information with third parties

The Funds will share your personal information with third parties only if:

- You have consented to such disclosure;
- Sharing it is necessary to obtain your contact details to enable communication or payment of a benefit to you;
- Sharing it is necessary to put an agreement in place that is for your benefit; or
- We are allowed to share the information in terms of POPIA, for example where we are required to do so by law, or where it is necessary to protect the Funds' legitimate interests.

The Funds need to share your personal information with their service providers to ensure that your benefit is correctly administered and invested, and for underwriting and reinsurance purposes. We do however have service agreements in place with all our service providers to ensure that they comply with the privacy requirements as required by POPIA and they are obliged to use your personal information only for the reasons and purposes it was disclosed to them.

Securing your personal information

The Funds realise that they are legally obliged to ensure the adequate protection of your personal information and to ensure that data breaches do not occur, for example, the accidental disclosure of your personal information to someone not authorised to access it. The Funds will therefore take all reasonable technical and organisational precautions to prevent data breaches and to ensure that all its service providers have strict policies, rules and measures in place to protect your personal information.

The Funds will not keep your personal information any longer than necessary for achieving the purpose for which the personal information was collected, except where POPIA allows for it to be kept for longer periods.

You can access, review, correct and/or request deletion of your personal information

You have the right to know what personal information of you is stored by the Funds and to request that we provide you with a description of the personal information we hold about you at any time by completing [this form](#).

While the Funds will always do everything in their power to ensure that your personal information is complete, accurate, not misleading and updated where necessary, it will be your responsibility to advise us of any changes to your personal information, as and when they occur.

If you think we have outdated/incomplete/inaccurate personal information, you can ask to review your personal information contained in the Funds' records at any time to correct or update the information by completing [this form](#). You can use this same form to request that personal information be deleted if you feel it is excessive or misleading, or that it was obtained unlawfully by the Funds.

If the purpose for which your personal information was requested initially does not exist anymore (for example you are no longer a member of the Funds), you may request the personal information held by the Funds to be removed. However, the Funds may decline your request to remove the personal information from their records if other legislation requires them to keep the information or if it has been de-identified (that is, any information that identifies you or that can be used/manipulated to identify you, has been deleted).

Complaints and objections

You have the right to request that we consider your objections to the processing of your personal information. [Please click here for the request form](#).

If you feel that your personal information has not been processed in accordance with POPIA and the principles set out above, you may submit a complaint to the Funds' Information Officer. Where we are unable to resolve your complaint to your satisfaction, you have the right to complain to the Information Regulator by sending an email to POPIAComplaints@inforegulator.org.za. For further information regarding the complaints process, please visit the website of the Information Regulator, at <https://inforegulator.org.za>.

If you have any questions about this notice or the Funds' treatment of your personal information, please send an email to the Funds' Information Officer.