Mufaro
EMPLOYEE BENEFITS

PRIVACY NOTICE

Effective Date: June 2026

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MUFARO EMPLOYEE BENEFITS (PTY) LTD

Registration Number: 2003/031745/07
Authorised Financial Services Provider: FSP 4534

1. Introduction

Mufaro Employee Benefits (Pty) Ltd ("Mufaro") is committed to protecting the privacy and confidentiality of Personal Information entrusted to us.

This Privacy Notice explains how we collect, use, store, share and protect Personal Information in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), and other applicable South African legislation.

It applies to Personal Information processed in the course of our business activities, including information relating to clients, retirement funds, participating employers, members, beneficiaries, employees, suppliers, service providers and visitors to our website.

2. Personal Information We Process

The nature of the Personal Information we process depends on the services provided and our relationship with the individual or organisation concerned.

This may include:

- Identification and contact details;
- Employment, salary and retirement fund membership information;
- Insurance and employee benefit information;
- Beneficiary and dependant details;
- Financial, banking and payment information;
- Death, funeral, disability and other claims documentation;
- Medical and health-related information where lawfully required;
- Information relating to employees, suppliers and service providers; and
- Correspondence and other information necessary to provide our services.

Certain information, particularly medical and health-related information, is classified as Special Personal Information under POPIA and is subject to additional legal requirements and safeguards.

Where necessary for the administration of employee benefits and claims, we may also process information relating to children, subject to the requirements of POPIA.

3. How We Obtain Personal Information

Mufaro may obtain Personal Information directly from individuals or through authorised sources, including:

- Retirement funds and their administrators;
- Participating employers;
- Insurers and other authorised financial services providers;

- Medical practitioners and other relevant professionals;
- Members, beneficiaries and their authorised representatives; and
- Service providers and other parties lawfully authorised to provide information.

We may also collect limited Personal Information when individuals contact us directly, correspond with us or submit enquiries through our website.

4. Why We Process Personal Information

Mufaro processes Personal Information for legitimate business, contractual and regulatory purposes, including:

- Providing employee benefits consulting and advisory services;
- Supporting the administration of retirement fund and insurance arrangements;
- Assessing, managing and administering insurance and employee benefit claims;
- Verifying membership, eligibility and benefit entitlements;
- Communicating with clients, members, beneficiaries and other stakeholders;
- Managing business relationships and contractual obligations;
- Responding to enquiries, requests and complaints;
- Meeting legal, regulatory and reporting obligations; and
- Maintaining appropriate business records and protecting legitimate interests.

We process Personal Information only where there is a lawful basis for doing so. This may include consent, contractual requirements, compliance with legal obligations or other grounds permitted under POPIA.

Where providing information is necessary for a particular service, claim or legal requirement, failure to provide the required information may affect our ability to perform that function.

5. Our Role in Processing Personal Information

Depending on the nature of our appointment and the services provided, Mufaro may act as a Responsible Party or as an Operator under POPIA.

Where Mufaro determines the purposes and means of processing Personal Information, we fulfil the responsibilities of a Responsible Party.

Where we process information on behalf of a retirement fund, insurer, employer or another Responsible Party, we do so in accordance with the applicable mandate, contractual arrangements and legal requirements.

6. Sharing of Personal Information

Mufaro may share Personal Information with authorised parties where necessary to fulfil its responsibilities, including:

- Retirement funds and their administrators;
- Insurers and participating employers;
- Medical practitioners and other authorised professionals;
- Contracted service providers supporting our operations;
- Professional advisers, auditors and financial institutions, where relevant; and
- Regulatory authorities, statutory bodies and other parties where disclosure is required or permitted by law.

We do not sell Personal Information.

Personal Information is disclosed only where there is an appropriate lawful basis, and we take reasonable steps to ensure that recipients are subject to applicable confidentiality and information protection obligations.

7. Protection of Personal Information

Mufaro maintains appropriate and reasonable technical and organisational measures designed to protect Personal Information against loss, unauthorised access, unlawful disclosure, alteration or misuse.

Access to Personal Information is restricted according to operational responsibilities and legitimate business requirements.

Our information protection arrangements are supported by internal governance policies, procedures and oversight measures.

Where a security compromise occurs, we will take appropriate steps to investigate and address the incident and provide notifications where required by POPIA.

8. Retention of Personal Information

Mufaro retains Personal Information only for as long as reasonably necessary to fulfil the purpose for which it was collected, meet contractual obligations or comply with applicable legal and regulatory requirements.

Where information is no longer required and there is no lawful basis for continued retention, it will be securely deleted, destroyed or de-identified, as appropriate.

9. International Transfers of Personal Information

Mufaro conducts its business operations in South Africa.

Where Personal Information is transferred to, stored in or accessed from another country through an authorised service provider or technology arrangement, such processing will be subject to the applicable requirements of POPIA, including the safeguards prescribed for cross-border transfers.

10. Your Rights Under POPIA

Subject to applicable legal requirements, individuals have the right to:

- Request confirmation of whether Mufaro holds their Personal Information;
- Request access to Personal Information held about them;
- Request correction or deletion of information that is inaccurate, outdated, incomplete or unlawfully processed;
- Object to certain processing activities where permitted by law;
- Withdraw consent where consent is the basis for processing; and
- Lodge a complaint with Mufaro or the Information Regulator.

Requests may be subject to identity verification and applicable legal or contractual restrictions.

Where Mufaro processes Personal Information on behalf of another Responsible Party, requests may need to be referred to or coordinated with that organisation.

11. Website Privacy

Mufaro's website provides information about our business and services and allows visitors to submit enquiries through a contact form.

The contact form collects the visitor's name, email address, telephone number and enquiry details. This information is used to respond to the enquiry and provide relevant assistance.

Our website also makes the Mufaro Bulletin available for visitors to read or download without requiring registration or subscription.

We do not request medical records, claims documentation or other sensitive employee benefit information through the website contact form.

Mufaro's website does not currently use cookies, website analytics or third-party tracking technologies. Should this change, this Privacy Notice will be updated accordingly.

12. Privacy Enquiries and Requests

Requests relating to Personal Information, including access, correction, deletion, objections or privacy-related complaints, may be directed to Mufaro's Information Officer.

Information Officer: Rohine Singh
Deputy Information Officer: Busi Mbukwane

Mufaro Employee Benefits (Pty) Ltd
220 Willow Wood Office Park
Corner Cedar Road and 3rd Street
Broadacres, South Africa

Telephone: (011) 065 9590
Email: enquiries@mufaro.co.za

Requests for access to records may also be subject to the procedures prescribed under the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), and Mufaro's PAIA Manual.

13. Complaints to the Information Regulator

Individuals who believe that their Personal Information has been processed in contravention of POPIA may lodge a complaint with the Information Regulator of South Africa.

Further information regarding privacy rights and complaints procedures is available from the Information Regulator at:

Website: www.inforegulator.org.za

14. Changes to This Privacy Notice

Mufaro may update this Privacy Notice to reflect changes in legislation, regulatory requirements, business operations or information processing practices.

The latest version will be made available on our website.

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Document Owner: Information Officer
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