

# Privacy Policy

**Effective Date:** May 2026 • **Last Updated:** May 2026

*POPIA Compliant — Protection of Personal Information Act 4 of 2013*

## 1. Who We Are

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Diversity Financial (Pty) Ltd (“Diversity Financial”, “we”, “our”, or “us”) is a standalone entity providing Retirement Benefits Counselling services as required by the Pension Funds Act 24 of 1956 and the 2017 Default Regulation. We are not a Financial Services Provider and do not hold a FAIS licence — our counselling is strictly factual and informational, entirely free from any conflict of interest.

We act as a Responsible Party under the Protection of Personal Information Act 4 of 2013 (“POPIA”).

## 2. Information We Collect

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We may collect and process the following categories of personal information:

- **Identity and contact information:** Full name, South African ID number or passport number, date of birth, residential address, email address, telephone number, and mobile number.
- **FICA and compliance documents:** Copies of your identity document or passport and proof of address, required under the Financial Intelligence Centre Act 38 of 2001 (“FICA”) for client verification purposes.
- **Employment and retirement information:** Fund membership details, contribution history, retirement fund statements, benefit election information, and relevant details relating to the Two-Pot Retirement System, preservation, and termination options.
- **Counselling session records:** Recordings and transcripts of retirement benefit counselling sessions conducted by phone or other channels, retained for regulatory and audit compliance as required under PFA Guidance Notice No. 8 of 2018.
- **SMS and digital confirmation records:** Records of SMS confirmation links sent to members following a counselling session, including the mobile number used and the content confirmed.
- **Website usage data:** IP address, browser type, pages visited, session duration, and referral source, collected automatically through cookies and analytics tools.
- **Marketing preferences:** Your email address and communication preferences if you subscribe to our newsletter or marketing communications.

*We do not knowingly collect personal information from persons under the age of 18 without the consent of a competent person as defined in POPIA.*

### 3. How We Use Your Information

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We process your personal information for the following purposes:

- To provide retirement benefit counselling services and fulfil our obligations under the Pension Funds Act and the 2017 Default Regulation.
- To verify your identity and comply with our FICA obligations.
- To record, document, and retain counselling sessions in full compliance with PFA Guidance Notice No. 8 of 2018 and to make these available for regulatory audit upon request.
- To send SMS confirmation links to members following a counselling session, providing a documented record of the content received.
- To communicate with you regarding your retirement benefit options, fund rules, and legislative changes affecting you.
- To send marketing and educational communications where you have opted in to receive these.
- To improve our website and services through anonymised analytics and usage data.
- To comply with applicable law, regulatory requirements, and reporting obligations.
- To respond to enquiries, complaints, or requests you submit to us.

### 4. Legal Basis for Processing

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We process your personal information on the following grounds:

- **Contractual necessity:** Processing is required to provide you with our retirement benefit counselling services.
- **Legal obligation:** Processing is necessary to comply with FICA, the Pension Funds Act, the 2017 Default Regulation, PFA Guidance Notice No. 8 of 2018, and other applicable legislation.
- **Consent:** Where you have given us your explicit consent, such as for marketing communications or optional cookies.
- **Legitimate interest:** Where we have a legitimate business interest that does not override your rights, such as website analytics to improve our services.

### 5. Sharing Your Information

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We do not sell your personal information. We may share your information with:

- **Pension funds and fund administrators:** Where necessary to provide retirement benefit counselling or process your benefit elections.
- **Regulatory bodies:** Such as the Financial Sector Conduct Authority (FSCA), the South African Revenue Service (SARS), or the Financial Intelligence Centre (FIC) where required by law.
- **Service providers:** Third-party providers who assist us with IT infrastructure, telephony, SMS delivery, or website analytics, bound by confidentiality obligations and processing only on our instruction.
- **Professional advisors:** Including legal or compliance advisors, where necessary to protect our rights or comply with applicable law.

Any cross-border transfers of personal information will be carried out in compliance with section 72 of POPIA.

## 6. Cookies and Website Analytics

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Our website uses cookies — small text files stored on your device — to help us understand how visitors use our site and to improve your experience. We use two categories of cookies:

- **Essential cookies:** Necessary for the website to function correctly. These cannot be disabled.
- **Analytics cookies:** Help us understand visitor behaviour in aggregate and anonymised form (e.g. pages visited, session duration). We use these to improve our content and services.

You may manage or disable non-essential cookies through your browser settings or our cookie consent banner. Disabling analytics cookies will not affect your ability to use our website.

## 7. Marketing Communications

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Where you have subscribed to our mailing list or opted in to receive marketing material, we may send you newsletters, educational content, and updates relevant to retirement planning and pension legislation.

You may withdraw your consent and unsubscribe at any time by clicking the “unsubscribe” link in any email we send, or by contacting us directly using the details in section 12 below. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.

## 8. Data Retention

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We retain your personal information for as long as is necessary for the purposes for which it was collected, or as required by law. In particular:

- FICA records are retained for a minimum of five years as required under the Financial Intelligence Centre Act.
- Retirement counselling records, session recordings, and audit trail documentation are retained for a minimum of five years from the date of the relevant interaction, or as otherwise required under the Pension Funds Act and PFA Guidance Notice No. 8 of 2018.
- SMS confirmation records are retained as part of the counselling audit trail for the same period.
- Marketing subscription records are retained until you unsubscribe.
- Website analytics data is retained in anonymised or aggregated form.

Once personal information is no longer required, we will securely delete or de-identify it.

## 9. Your Rights

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Under POPIA, you have the following rights in respect of your personal information:

- **Right of access:** To request confirmation of whether we hold your personal information and to obtain a copy of it.
- **Right to correction:** To request that inaccurate, incomplete, or outdated information be corrected or updated.
- **Right to deletion:** To request the deletion or destruction of your personal information, subject to our legal and regulatory retention obligations.
- **Right to object:** To object to the processing of your personal information in certain circumstances, including for direct marketing purposes.
- **Right to withdraw consent:** Where processing is based on your consent, to withdraw that consent at any time.
- **Right to lodge a complaint:** To lodge a complaint with the Information Regulator of South Africa if you believe your rights have been infringed.

To exercise any of these rights, please contact our Information Officer using the details in section 12 below. We will respond within a reasonable time and no later than 30 days of receiving your request.

The Information Regulator can be contacted at: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## 10. Security

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We implement appropriate technical and organisational measures to protect your personal information against unauthorised access, disclosure, alteration, or destruction. These measures include secure data storage, restricted staff access, call recording security protocols, and regular review of our information security practices.

In the event of a data breach that poses a real risk of harm to you, we will notify you and the Information Regulator as required under section 22 of POPIA.

## 11. Changes to This Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. The updated policy will be posted on our website with a revised effective date. We encourage you to review this policy periodically. Where changes are material, we will take reasonable steps to notify you.

## 12. Contact Us

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For any questions, requests, or complaints relating to this Privacy Policy or the processing of your personal information, please contact our Information Officer:

### **Diversity Financial (Pty) Ltd**

**Information Officer:** Athabile Jojo

**Telephone:** 011 568 2750

**Email:** [info@diversityfinancial.co.za](mailto:info@diversityfinancial.co.za)

**Website:** [www.diversityfinancial.co.za](http://www.diversityfinancial.co.za)

**Address:** 34 Impala Road, Chislehurst, Sandton, 2196