



Privacy Notice

Lifestyle Retirement Annuity Fund
Registration number:12/8/6776

Lifestyle Retirement Preserver Pension Fund
Registration number:12/8/27974

Lifestyle Retirement Preserver Provident Fund
Registration number:12/8/27975

(“the fund”)

WHAT IS THIS NOTICE FOR?

We know that you care about your personal information and how it is used, and we want you to trust that the fund and its service providers uses your personal information carefully. Protection of personal information by the fund is part of our overall protection of you as a member, beneficiary or other person interacting with the fund. This Privacy Notice will help you understand what personal information the fund collects, why we collect it and what we do with it.

WHO ARE WE?

The fund is a registered retirement fund under the Pension Funds Act. Participation in the fund is voluntary.

The fund is governed by a Board and has a Principal Officer. The Board members and the Principal Officer change from time to time.

MEANING OF WORDS

We have tried to keep this Privacy Notice as simple as possible, but if you're not familiar with terms, such as personal information, processing or special personal information, then you can read about these terms first in Annexure A and the details of the InformationRegulator.

WHY DO WE USE YOUR PERSONAL INFORMATION?

The fund uses your personal information for the following purposes:

- (a) Mainly to provide benefits in terms of its rules for its members and former members as well as the dependants of such persons upon the death of a member. These benefits are provided on withdrawal or retirement from the Fund on instruction from the member, or in certain circumstances due to the ill-health of the member.
- (b) Receive contributions from members who participate in the Retirement Annuity Fund and to process information about those contributions related to the members.
- (c) Allocate contributions and transfer amounts received to investments portfolios chosen by the member.
- (d) Manage and oversee the insured policies of the Retirement Annuity Fund .
- (e) Investigate and then exercise its discretion concerning the allocation of lump sum death benefits payable to beneficiaries.
- (f) Process divorce and maintenance orders as applicable.
- (g) To exercise a discretion as regards withholding or deduction from benefits to beneficiaries, as applicable.
- (h) Comply with information requests by the Fund's regulators and to provide information and reporting as required by law.
- (i) Manage or oversee Section 14 transfers into and out of the Fund.
- (j) The Fund's board directs, control and oversee the operations, administration and investments of the Fund and to comply with duties set out in the Pension Funds Act (and its successors), including section 7D of this Act and other relevant law.

- (k) Ensure the Fund’s board and committees meet regularly, prepares agenda, minutes, resolutions in relation to the management of the Fund.
- (l) To provide relevant and appropriate communication to the members of the Fund and other stakeholders.
- (m) To manage requests for information and complaints related to the Fund.
- (n) Manage Fund officials, potential Fund officials, service providers, operators and the officials and employees of service providers and operators so as to facilitate or manage their appointment, removal, assessment, monitoring, fitness for office, service capability, delivery, performance and other relevant factors.
- (o) Maintain, amend, consolidate or otherwise manage the rules and other documentation of the Fund.

WHAT SORT OF PERSONAL INFORMATION DO WE COLLECT?

HIGH-LEVEL FUND ACTIVITIES THAT INCLUDE THE PROCESSING OF PERSONAL INFORMATION		
Activity number	Processing activity	Personal information processed
1	Personal Information and Special Personal Information: Board members and other fund officers – appointment, election, ongoing fit and proper requirements, evaluation and removal i.e. “ board member data ”	Full names, identity number, date of birth, nationality, occupation, residential address, business address, postal address and date of appointment, conflicts and declarations of interest, board memberships, in some cases other employment or provisions of services information and remuneration information, training, education, qualifications, experience, fit and proper requirements information, criminal record, professional body membership and disciplinary information, telephone numbers, email addresses, name of employer, directorships, prescribed person information, FICA information, reasons for removal from office.
2	Personal Information and Special Personal Information: General – many activities performed by the fund’s board related to the fund’s operations and investments and this will include fund information and membership data. “ membership data ” is specified in the next column)	Membership data: Records of the operations of the fund. Including: membership records with details and dates of joining and leaving the fund, members’ identity or other numbers, dates of birth, age, nationality, retirement age, employer details, including name, registration number, FICA information, members’ contact details, including cell phone numbers and addresses, policy number for members with insured benefits.

	(excluding nomination of beneficiary information, which is dealt with specifically below).	Assets receipt or payment of money or assets in respect of transfers in and out, ill-health early retirement and disability information (limited), divorce and maintenance information and orders (including information contained therein about ex-spouses, partners, ex-partners, living arrangements, spouses, family and children), unclaimed benefits, residence of members or members' spouse, mortgage over property. RA Fund: Corporate RA/ ECPP member ONLY: contributions received, contributions schedules from employer. Employer association information.
3	Personal Information: Payment of benefits (excluding (i) lump sum death benefits and (ii) deductions and withholding which are dealt with separately below): benefit payments made to a member leaving the fund other than on transfer, for example on withdrawal, death, retirement or ill-health retirement.	Membership data, Elections regarding payment of benefits, Members financial advisor details. Tax payable with respect to member, tax directives and applications, PAYE, knowledge of members' tax affair e.g. if they are not in order, Bank account details
4	Personal Information: Administration of contributions, including receipt and allocation to investment portfolios, monitoring, reporting, allocation to fund expenses.	RA Fund ONLY. Membership data. Members contribute via debit order, occasionally cash deposits. Corporate RA members, the employer contributes on behalf of their members and submits a schedule. This is for convenience and with the consent of the member.
5	Personal Information: Investment strategy, administration and management	Membership data
6	Personal Information: Insurance Policies of the Fund. Management of insured member policies issued and the Fidelity Guarantee Policy.	Membership data
7	Personal Information: Benefit statements – annual	Membership data
8	Personal Information and Special Personal Information: Lump sum death benefits – payable by the fund	Membership data. Nomination of beneficiary data (see activity 10), including of children.

	under section 37C of the Pension Funds Act – investigation as well as allocation and payment decisions.	Beneficiary information: name, identity numbers, address and other contact information, relationship to deceased, ability to look after financial affairs, financial literacy, banking records, employment status, occupation, financial (assets and income statements), children, family members, living arrangements, account numbers and details, criminal behaviour, divorce and maintenance information, partner, spouse and ex-partner and spouse information, caregiver, health, medical records, life expectancy information, education, training, age, identity number, longevity, sex-life, paternity tests. Other information required to determine dependency.
9	Personal Information and Special Personal Information: Decisions to withhold or deduct from beneficiary benefits – in terms of section 37D of the Pension Funds Act.	Membership data. Divorce or maintenance order deductions. Criminal behaviour of beneficiaries that may impact on the payment to the beneficiary – e.g. the beneficiary is responsible for the death of the member.
10	Personal Information and Special Personal Information: Nomination of beneficiaries by members i.e. member's " <i>nomination of beneficiaries data</i> "	Membership data. Names, identity numbers, percentage nomination of member's children, spouses, partners, parents, siblings, other family members, important others, relationship to member, sex-life information, health information.
11	Personal Information: Financial statements and prescribed reporting	Membership data. Board member data.
12	Personal Information and Special Personal Information: Requests for information and complaints	Membership data. Board member data. Upon divorce and maintenance queries with respect to member: member's representatives, fund name and registration number, membership of the fund, pension interest amount, housing loan information (death claims), children, spouses, partners, ex-spouses and partners personal information and their advisors.
13	Personal Information: Transfers in and out of the fund. (Establishing, registration, termination, liquidation of fund).	Membership data. Board member data. Data relating to members and former members.
14	Personal Information: Appointment, contracting and termination of service providers, appointees, agents and ongoing monitoring and	Membership data. Board member data. Information of service providers: company name, company registration numbers, FICA information, due diligence information, including previous criminal behaviour or other forms of misconduct and fit and proper information, directors and

	reporting of service providers- <i>provider information</i>	management identity and contact details, legal, compliance and regulatory information, contractual arrangements, errors and omissions, information about claims or litigation, conflicts and declarations of interest, qualifications, licenses, fit and proper requirements information, professional body membership, prescribed information
15	Personal Information: Meetings, sub-committee meetings, packs, agendas, resolutions, minutes, receiving and storage of fund information	All the above mentioned information for the management of the fund.

WHO DO WE COLLECT YOUR PERSONAL INFORMATION FROM?

Our responsibilities to you are very important to us and we aim to provide you with personalised services to meet your needs. We may process your personal information for any of the reasons outlined below.

Most often we collect your personal information from you, but we do not always. For example, we collect personal information about you sometimes from your financial advisor (with your consent) or in a few instances (closed group of members) the members' employer (i.e. contribution schedules).

We rely on the following justifications, allowed in the Protection of Personal Information Act not to collect personal information directly from you (a data subject):

1. Contract;

- We may need to process your personal information if we require it to conclude or perform under a contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered into a partnership, collaboration or alliance arrangement or for purposes of:
- providing products and services to you that involve opening and maintaining your account, executing transactions, administering claims where applicable, collecting payments due to us by you, managing our risks and maintaining our overall relationship with you;
- communicating with you regarding the products or services you have with us; or
- providing you with further information that you request from us regarding the products or services you have with us.

2. Lawful obligations

We may need to process your personal information for the following purposes:

- To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists.
- To comply with other risk management, regulatory and legislative requirements.
- To comply with voluntary and mandatory codes of conduct.

- To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activity that could lead to loss.
- To process and settle transactions and payments.
- To conduct research and analysis (which may include assessing product suitability, credit quality, insurance risks, market risks and affordability, developing credit models and tools and obtaining related information).

3. Legitimate Interest

The Fund may process your personal information in the regular management of its business and to protect the interests of the Group and its clients, depositors, shareholders, employees and other third parties, including our business partners and members of the general public.

The Fund may process your personal information in order to:

- Maintain, monitor, improve and develop our business policies, systems and controls;
- Maintain and improve data quality;
- Design, develop and test products, services and solutions for clients, which may include combining sources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws;
- Personalise and customise products, services and solutions, messaging and advertising;
- Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
- Manage business emergencies and stress events;
- Process and settle transactions and payments;
- Meet record-keeping obligations;
- Conduct research and analysis (among other things, to assess product suitability, credit quality, insurance risks, market risks and affordability, to conduct behavioural profiling, to develop credit models and tools and to obtain related information);
- Enable clients to use value-added solutions and participate in reward programmes
- Enable the trustees to effectively carry out their duties in terms of S37C of the Pension Funds Act
- Achieve other related purposes.

4. Consent

In addition to the reasons given above, we may process your personal information where we have your specific consent for a defined purpose. We will also seek your consent where applicable laws require it.

We will store your personal information according to our defined retention schedules and thereafter delete it.

WHO DO WE SHARE YOUR PERSONAL INFORMATION TO?

We try to be very careful about who we give your personal information to. But in order to achieve the fund's purposes (for example, administering the fund and paying benefits to

members) the fund does provide your personal information to other persons. (The fund's purposes are set out above.) For example, we provide your personal information to the following persons:

- the fund's administrator and insurer of the assets and their various servicing departments (you usually provide your information directly to these parties);
- the fund's auditors (samples for the annual Fund audit);
- the fund's legal providers (only where necessary);
- the fund's tracing agents (only where necessary);
- other service providers or agents of the fund (only where applicable);
- the Financial Sector Conduct Authority, Prudential Authority, South African Reserve Bank, the Information Regulator and relevant authorities and regulators (as applicable in terms of reporting requirements or requests);
- the South African Revenue Services, the Financial Intelligence Centre and other government entities;
- Ombud and the Financial Services Tribunal (only where applicable);
- Basic lump sum death benefit related personal information of beneficiaries to other beneficiaries;
- Spouses, ex-spouses of members and their representatives (only for divorce orders);
- Court appointees (only if legal action is being taken);
- The board and other fund officers to manage and oversee the Fund's operations of the administrator and other service providers ; and
- Other persons lawfully entitled to receive personal information in relation to the fund.

WHAT DO WE RELY ON TO USE YOUR PERSONAL INFORMATION?

Many times, the fund relies on justifications, other than your consent, to use your personal information to do what we need to do. In some instances, the Fund does rely on your consent, for example where we receive a claim form signed by you. But often the fund will rely on one of the following grounds to use your personal information:

- It's necessary to carry out actions for a contract with the data subject
- It complies with an obligation imposed by law on the fund,
- It protects the legitimate interest of the data subject; or
- It's necessary to pursue the legitimate interests of the fund or a third party to whom the information is supplied.

For more specific information about the grounds we rely on to use your personal information, please request the fund's Data Protection Policy from the fund's Information Officer.

SENSITIVE PERSONAL INFORMATION

The fund processes special personal information and children's personal information as part of its normal activities.

Special personal information collected and used by the fund includes religious beliefs, race, health or sex life, biometric information and criminal or objectionable behaviour.

For more specific information about how we collect and use special personal information and children's personal information as well as the justifications we rely on to do so, please request the fund's Data Protection Policy from the fund's Information Officer.

TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA

The only time the fund transfers your personal information outside of South Africa is where the administrator uses cloud storage/ However, we will always make sure that we protect your personal information as required by POPIA if your personal information leaves the country.

SECURITY MEASURES FOR YOUR PERSONAL INFORMATION

The fund, and its service providers, employ appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information.

The security of your personal information is important to us and we take reasonable steps to keep your personal information safe and to prevent loss, destruction of and damage or unlawful access to your personal information by unauthorised parties. We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal information through unauthorised channels, as these are not a secure way of communication and carry a risk of interception and unauthorised access. You should only share personal information through our authorised channels.

[Use of cookies on our website](#)

A "cookie" is a small text file that is stored on your computer, smartphone, tablet or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your login details and your preference settings, and helps the website or the application to recognise your device.

Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online channels. To use or store cookie types that are not required for the functioning of the website or app and are optional, we will obtain your consent first.

Reference: www.liberty.co.za

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

We will keep your personal information for as long as is necessary to achieve the fund's purposes. We will destroy hard copy information as soon as it has been digitised but no longer than 5 years. If the fund is no longer authorised or required to keep it in terms of law, agreements, consent or its Data Protection Policy it will be destroyed.

Funds most often need to keep information for long periods, even long after the person has left the fund or stopped being paid. It is often the case that former members come forward when they retire to make claims for payment of their pension entitlements. In addition, when a former or retired member dies, this type of claim may be made by the former or retired member's beneficiaries. Therefore, it is important for the fund to have sufficient documentation

to be able to verify the payment status of former members' entitlements. This will avoid duplication of payments and ensure that payments are made to those who are entitled to receive them.

The fund has determined that it will not permanently delete a member's basic electronic member record, claims and payment record. The information is restricted and is an inactive member account.

The retention periods for specific types of Fund records that contain personal information are set out in its Data Protection Policy.

For more information about how long we keep your personal information for, please refer to the fund's Data Protection Policy, which can be obtained via the email: privacy@liberty.co.za.

YOU HAVE A RIGHT TO ASK US FOR INFORMATION OR ASK US TO DO OTHER THINGS

You have the following rights under POPIA:

What are your rights?

We value your trust and want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with the Fund. You have the right to:

- access the personal information we hold about you and to correct and update your information;
- object to our processing your personal information, where applicable;
- request that we delete your personal information where appropriate;
- be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorised person;
- object to the processing of personal information for the purposes of direct marketing;
- not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances; and
- to request reasons or make a representation to us if your application for products and/or services is refused.

HOW TO ACCESS YOUR INFORMATION:

You can always access the Promotion of Access to Information Act Manual ([Your Fund and Trustees](#)). You will find this link on the Liberty website which includes details of the Fund's Information Officer. You can also contact: privacy@liberty.co.za for further assistance.

Group Privacy Officer PO Box 10499

Johannesburg 2000

Tel: [+27 11 408 2559](tel:+27114082559) / [+27 11 408 5027](tel:+27114085027)

Physical Address: Liberty Group Limited Liberty Centre

1 Ameshoff Street, Braamfontein, Johannesburg 2001

Annexure A – Meaning of words

Biometric information means any information from any personal identification technique based on a person's physical, physiological, or behavioural characteristics, such as their fingerprint, retina, voice, blood type, or DNA.

Board means the group of persons appointed or elected as board members in terms of the Rules of the fund and the Pension Funds Act.

Breach means an incident of failing to protect personal information where a person gets unauthorised access to it, for example through hacking, theft or a leak. This includes a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information.

Children means a natural person younger than 18 who are legally incompetent to take legal action or make decisions about themselves without assistance from a competent person, such as their parent or guardian.

Consent means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

Data subject means the people or organisations that the personal information is about, for example the members of the fund.

Direct marketing means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:

(a) promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or

(b) requesting the data subject to make a donation of any kind for any reason.

Information Regulator means the public body whose role it will be to enforce compliance with POPIA.

PAIA means the Promotion of Access to Information Act, 2 of 2000.

Pension Funds Act means the Pensions Funds Act 24 of 1956 or its successor.

Personal information means any information about a living human being or an existing company, close corporation, or other juristic person, provided that the human being or juristic person is capable of being identified. It includes both public and private information. It includes special personal information. It excludes purely statistical information and de-identified information.

POPIA means the Protection of Personal Information Act 4 of 2013.

Processing means doing almost anything with personal information, including collecting it, disclosing it, or combining it with other information.

Record means any recorded information, no matter its form or medium (including written, electronic, labelled, illustrative, or visual records) that the responsible party possesses or controls, regardless of whether the responsible party created them or when they came into existence.

Rules means the rules and amendments to the Rules of the fund, as registered by the Financial Sector Conduct Authority from time-to-time.

Special personal information means specific types of personal information which are set out in POPIA and that have general and special processing grounds. Special personal information includes religious or philosophical beliefs, race or ethnicity, trade union membership or political persuasion, health or sex life, biometric information and criminal or objectionable behaviour.

IF YOU NEED MORE INFORMATION

If you have engaged with the Information Officer and you are still not happy how the Fund has used your personal information, you can complain to the Information Regulator using the details are below:

Information Regulator

Physical address: The Information Regulator (South Africa)

JD House, 27 Stiemens Street

Braamfontein

2001

Postal address:

PO Box 31533, Braamfontein, 2017

Telephone number: +27 10 023 5207

Fax number: +27 11 403 0668

PAIA Complaints email: PAIAComplaints@info regulator.org.za

POPIA Complaints email: POPIAComplaints@info regulator.org.za

General enquiries email: enquiries@info regulator.org.za