NJMPF
KwaZulu-Natal Joint Municipal Pension/Provident Funds

PRIVACY POLICY

1 INTRODUCTION

This Privacy Policy ("**Policy**") explains how the KwaZulu-Natal Joint Municipal Pension/ Provident Funds ("**NJMPF**", "**we**", "**us**" and "**our**") collects, uses, transfers and protects your personal information as required in terms of the Protection of Personal Information Act 4 of 2013 ("**POPIA**"). We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

2 WHO ARE WE?

The NJMPF is both a defined benefit pension and a defined contribution fund that is registered as a self-administered pension fund in terms of the Pension Fund Act, 24 of 1965 that manages pensions and related benefits on behalf of local municipal employees in the province of KwaZulu-Natal ("**KZN**"). NJMPF is responsible for three funds, namely, the KwaZulu-Natal Joint Municipal Pension Fund (Superannuation), KwaZulu-Natal Joint Municipal Pension Fund (Retirement) and the KwaZulu-Natal Joint Municipal Provident Fund, colloquially these are referred to as NJMPF.

3 WHAT IS PERSONAL INFORMATION?

3.1 The term "personal information" as used in this Policy is defined as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person to whom personal information relates is referred to as the "data subject" ("**data subject**", "**you**" and "**your**").

3.2 Examples of personal information include, but are not limited to, contact information, financial information, information relating to race, gender, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person.

4 WHAT TYPE OF PERSONAL INFORMATION DOES NJMPF COLLECT?

4.1 We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for other certain purposes explained below. The personal information collected by NJMPF relates to our members, member beneficiaries, employees, job applicants and suppliers. The personal information includes, amongst others, -

4.1.1 full names and surnames,

4.1.2 contact details including, cell phone numbers, telephone numbers, fax numbers and emails,

4.1.3 addressees,

4.1.4 birth dates,

4.1.5 identity numbers and registration numbers in the case of a company,

4.1.6 financial information,

4.1.7 medical information,

4.1.8 information relating to beneficiaries (including spouses, guardians, children);

4.1.9 employment details,

4.1.10 tax information, and

4.1.11 Policies.

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

4.3 When you provide us, information relating to beneficiaries (for example, spouse, dependents and/or other third-party beneficiaries), we will process their personal information for the activation of any benefits and to pursue our and their legitimate interest. In addition, we will process their personal information for the purposes set out in this privacy policy.

4.4 You warrant that when you give us personal information about beneficiaries, you have received permission to share their personal information with us for the purposes set out in this privacy policy or any other related purposes. In the case of personal information relating to children beneficiaries, you expressly consent and authorise us to process such information in accordance with the purposes set out in this privacy policy.

5 HOW DOES THE NJMPF COLLECTION PERSONAL INFORMATION?

The NJMPF collects personal information from the following sources –

5.1 directly from you,

5.2 your employer,

5.3 third parties, for example credit reference and fraud prevention agencies, law enforcement agencies and tracing agents,

6 HOW DO WE USE YOUR PERSONAL INFORMATION?

6.1 Once we have lawfully collected your personal information, we will use your personal information for the following purposes –

6.1.1 to assess and process claims,

6.1.2 to provide products or services to you, to carry out the transaction you requested and maintain our relationship with you,

6.1.3 to provide you with the information about products and services that will support and enhance your retirement benefits that you qualify for,

6.1.4 providing on-going administration for the duration of your membership in the Fund (including resolving complaints),

6.1.5 to confirm and verify your identity or to verify that you are an authorised user for security purposes,

6.1.6 for the detection and prevention of fraud, crime,or any other malpractice,

6.1.7 to conduct customer satisfaction research or for statistical analysis,

6.1.8 process requests for the collection, updating, access or deletion of your personal information,

6.1.9 for audit and record keeping purposes,

6.1.10 in connection with legal proceedings, and

6.1.11 comply with applicable laws, regulatory requirements or industry codes to which we subscribe, or which apply to us.

7 DISCLOSURE OF YOUR PERSONAL INFORMATION

7.1 We may disclose your personal information to third parties who are involved in the delivery of products and services to you such as –

7.1.1 third parties for giving effect to the above purposes, for example state fraud prevention agencies, law enforcement agencies

7.1.2 tracing agents,

7.1.3 your employer, and

7.1.4 your broker, where applicable.

7.2 Where the NJMPF discloses your personal information to the above parties, the latter will be obliged to use that personal information for the reasons and purposes it was disclosed for. To this end, we have agreements in place with these third parties to ensure this.

7.3 The NJMPF may be obliged to disclose your personal information where we have a duty to disclose in terms of law or where we believe it is necessary to protect our rights.

8 INFORMATION SECURITY

8.1 The NJMPF will take reasonable and appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration disclosure or access.

8.2 We will, on a regular basis, continue to review our security controls and related to processes to ensure that your personal information is secure.

8.3 As stated above, when we contract with third parties, we conclude agreements with them in terms of which we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information is kept secure.

8.4 Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.

8.5 **If you disclose your personal information to a third party, such as an entity that operates a website linked to our website or anyone other than the NJMPF, WE SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.**

9 HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

9.1 We undertake to provide you with access to your personal information and provide mechanisms that any personal information found to be inaccurate, or incomplete could be corrected or amended as feasible subject to any requirement or rule for such personal information to be retained by law. For further information on how to exercise these rights, please refer to our PAIA manual which is available on our website at http://www.njmpf.co.za/.

9.2 Prior to the amendment, correction, or removal of your personal information, we require you to identify yourself and to identify the portion information requested to be amended, corrected or removed. A request for the amendment, correction or removal of personal information may be declined if the process of the request is unlawful, unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others or would be impractical.

9.3 Please note that any such access request and request to correct may be subject to a payment of a legally allowable fee and we will let you know what it is at the time of your request.

9.4 It is important that any information you provide directly to us is accurate and correct. Please let us know as soon as you can if any information, we hold about you is no longer correct. Providing false or inaccurate information in order to obtain a product or service may also result in services not being rendered as efficiently and effectively to as our valuable member.

10 RETENTION OF PERSONAL INFORMATION

10.1 We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

10.2 We may also retain your personal information to the extent and duration that we have a legitimate interest to process your personal information depending on, amongst others, the nature and lifespan our services or products provided to you.

10.3 We will upon your request, promptly return or destroy all of your personal information in our possession or control, save for that which we are legally obliged to retain.

11 YOUR RIGHTS AS A DATA SUBJECT

11.1 As a data subject, you have several data privacy rights. These rights include the right to request from the NJMPF access to, correction or deletion of your personal data or restriction of processing concerning your data or to object to the processing of your personal information. For further information on how to exercise these rights, please refer to our PAIA manual which is available on our website at http://www.njmpf.co.za/.

11.2 All the rights of a data subjects are contained in POPIA.

The information on these rights can be found at the Information Regulator's website at https://inforegulator.org.za/, to whom you have the right to make a complaint, if we do not resolve your concern.

12 POLICY REVISION

This policy will be reviewed and updated, if necessary, on a periodic basis but no less than once each year.

13 CONTACT US

If you have any questions about this Policy, our treatment of your personal information or wish to exercise any of your rights please contact our Information Officer whose details are as follows –

Name:	Zama Dube
Email:	Zama.Dube@njmpf.co.za
Contact number:	(031) 279 5355

14 VERSION CONTROL

Last updated in January 2025