



Insurance Brokers
Versekeringsmakelaars

Vir vinnige en akkurate diens
Service with accuracy and speed

**Dekfasure Insurance Brokers
PRIVACY POLICY**

Dekfasure Insurance Brokers (Pty) Ltd as a professional Financial Services Provider collects information in order to provide appropriate products and services according to our client's needs.

The accuracy and integrity of the information is dependent on that which we receive and we update the information as changes are advised to us. The accuracy does, however, depend on our clients notifying us of any changes as soon as possible.

Data held by Dekfasure Insurance Brokers is accessed only by authorised persons as necessary to provide services. We have implemented security and safeguards to protect the integrity of the data and to prevent unauthorised modification or destruction, bearing in mind that electronic transmission of data has risks which cannot be totally obviated.

Relevant personal information may be provided to third parties who provide services in regard to underwriting, surveys, claims or other allied services in connection with your financial products. These third parties are also bound by the privacy and confidentiality required in terms of the Protection of Personal Information Act as well as the Financial and Intermediary Services Act.

Our clients will be contacted only in regard to requirements or services connected to their financial products, or as consented to in writing, preferably using their selected means of communication

You, as the client, have a right to request access to your information to ensure that the details are correctly maintained. These details are shown on schedules and renewal or annual review documents provided to you.

We do advise clients that the accuracy of the information held is dependent on that which is provided to us.

Changes or corrections of address, contact details, use, ownership, values, or financial interest should be notified to us as soon as reasonably possible.

Records are retained for a minimum of five years after the relationship has ended in compliance with financial legislation or for a longer term as may be prescribed in law. Once the regulated time has elapsed the data will be destroyed according to a controlled process

Should you wish for further information regarding the privacy of your data, or wish to access your records you may contact the Information Officer at wimpie@dekfasure.co.za or call us on 012 346 8178

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Dekfasure Insurance Brokers (Pty) Ltd FSP: 1780

The purpose of the Compliance Framework is to ensure that the activities, products and services of Dekfasure Insurance Brokers (Pty) Ltd are carried out in accordance with the legislation under which it operates.

The benefits of incorporating compliance in the governance of the business include reducing risks, entrenching an ethical culture and building trust between the business, its clients, associates and regulators.

The responsibility for the compliance of the business ultimately rests with the Directors, however it is the duty of each person involved in the business to ensure that they comply with the policies and processes of the business.

Section 17(a) of the FAIS Act and section 5(3) of the FAIS Regulations prescribe the appointment of a Compliance Officer to facilitate the implementation of compliance, advise of changes, monitor and report to senior management as well as to the regulators.

Dekfasure Insurance Brokers (Pty) Ltd has appointed S Liebenberg of SDK Compliance Consultants to act as the FAIS Compliance Officer

1. Compliance Officer Duties

- 1.1 To assist the Provider to establish a compliance function in order to remain compliant with FAIS and its associated legislation;
- 1.2 To facilitate the establishment and maintenance of a monitoring program that takes into consideration all areas of the Provider's financial services, activities and any relevant ancillary services to ensure that compliance risks and changes to those risks are comprehensively monitored;
- 1.3 To review the monitoring program on a regular basis to ensure that emerging risks are taken into consideration;
- 1.4 To report to the Provider on a regular basis on at least the following;
 - Adequacy and effectiveness of the overall control environment for financial services and activities, including systems, policies, controls and procedures
 - The risks and deficiencies that have been identified
 - Remedies undertaken or to be undertaken
- 1.5 to provide management with written reports at least quarterly on the course of, and progress achieved, with compliance monitoring concerned, in order to ensure compliance with the FAIS Act and associated legislation;
- 1.6 To review and provide comments on the policies, processes and procedures implemented to facilitate compliance of activities with FAIS and its associated legislation;
- 1.7 To monitor the ongoing status of compliance within the business;
- 1.8 To make recommendations to the provider as regards any aspect of the required compliance or monitoring functions;
- 1.9 To assist management with their reports or returns in reporting to the Authority if requested to do so;
- 1.10 To submit reports to the Authority in the manner and regarding the matters as from time to time determined by the Authority to be submitted by Compliance Officers;

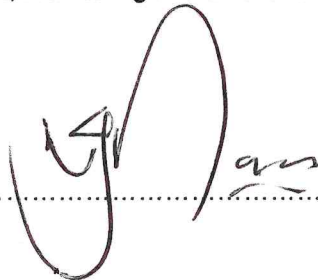
- 1.11 To report to the Authority in the event of a Material Breach of FAIS (Annexure A);
- 1.12 To call in at the main office at least quarterly. This may be managed by digital meetings as necessary in the times of pandemic, epidemic or similar fortuitous events
- 1.13 Visits to any Branches will be according to the agreement between the Provider and the Compliance Officer and by arrangement with management;
- 1.14 To facilitate the maintenance of the representative's register in accordance with the FAIS Act if authorised by management to do so and in accordance with the instructions received by management for the updating of the register;
- 1.15 Provide assistance, if requested by management, with the implementation of Competence Registers for all representatives from information provided by management
- 1.16 To monitor risk control measures implemented by management according to the Business Risk Management Plan;
- 1.17 To monitor the supervision processes implemented by the Provider in accordance with the FAIS Act;
- 1.18 To facilitate the compiling of a Compliance Manual to ensure ongoing access of pertinent information to all relevant persons;
- 1.19 To advise of new and pending relevant financial sector legislation;
- 1.20 To provide assistance with the compilation of awareness training if and when requested by management
- 1.21 To advise of new or pending requirements of the Financial Intelligence Centre Act with the understanding that the FAIS Compliance Officer, S Liebenberg, is not the Money Laundering Compliance Officer, nor responsible for the implementation of compliance with that Act or liaison with the Financial Intelligence Centre other than auditing compliance with the Financial Intelligence Centre Act as required by the Supervisory Body which is the Financial Sector Conduct Authority
- 1.22 To advise, if requested by management, the Information Officer in the implementation, risk assessment, monitoring and awareness training required in respect of POPI and PAIA legislation.

2 Duties of the Financial Services Provider

- 2.1 To ensure that legislative compliance is integrated in all processes and procedures and to establish a compliant governance structure and culture throughout the business
- 2.2 To ensure direct access to, and demonstrable support from, the senior management of the provider for the Compliance Officer
- 2.3 To provide access to all records, data systems or files required for compliance monitoring purposes
- 2.4 To advise the Compliance Officer of any changes to the profile and records of the FSP held by the Authority (as provided at the time of application and subsequently updated) and to ensure that these changes are submitted to the FSCA within 15 (fifteen) days

- 2.5 To draw up, and regularly review, a Disaster Recovery Plan including IT
- 2.6 To draw up a Risk Assessment and Management Plan
- 2.7 The Key Individual/s to be responsible for the registration and monitoring of representatives as well as the processes for the supervision of representatives acting under supervision
- 2.8 To maintain training records of all Key Individuals and Representatives and ensure that these as well as any certificate or diplomas are written up in each Representative or Key Individuals Competence register within 15 days of receipt.
- 2.9 To ensure that all business processes are documented and signed off by management
- 2.10 To ensure that the business processes and policies regularly reviewed and updated when necessary
- 2.11 To ensure that all Business Policies are reviewed at least annually and accessible by all relevant parties
- 2.12 To ensure that the Complaints Register is maintained and regularly reviewed
- 2.13 To work through the quarterly compliance report and respond accordingly, whether with remedial actions or updates of information
- 2.14 To appoint a Money Laundering Compliance Officer in terms of the Financial Intelligence Act 38 of 2001, as amended, to carry out the duties prescribed in that Act
- 2.15 To ensure the Money Laundering Compliance Officer provides the Compliance Officer with feedback on the implementation, training and monitoring of the compliance with the Financial Intelligence Act 38 of 2001 as amended
- 2.16 To appoint an Information Officer who is responsible for the implementation, POPI Risk assessment, monitoring and awareness training of all relevant persons.

Approved



Date 21/11/2025

JW Meyer
Director

Annexure A

Material Breaches

The following are Material Breaches with Immediate Reporting requirements (Regulatory oversight/Client suffers financial loss)

1. Fraud
2. Blatant licence category breach (incl CMS accreditation)
3. FSP operating without KI
4. FSP/Reps making use of unauthorised runners
5. Taking on new business while suspended.
6. Selling of unapproved products
7. Falsification of qualifications
8. Misrepresentation/Manipulation of information communicated to Regulator