Privacy Policy

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer's Contact Details

Name	Natasha Atkin
Contact Number	021 001 2323
Email Address:	info@investonline.co.za

Our details

Torchway Investments (Pty) Ltd Trading as Investonline
Great Westerford Building, 240 Main Road, Newlands, 7700
info@investonline.co.za

The Organisation is an authorised financial services provider with FSP nr 40592.

We render financial services in the following product categories:

(through Allan Gray, Old Mutual Wealth and Liberty Life)

- Long-Term Insurance

- Retail Pension Benefits
- Shares
- Money market instruments
- Warrants, certificates and other instruments
- Participatory interests in a collective investment scheme
- Long-term Deposits
- Short-term Deposits

The source of collection of your personal information:

We collect personal information directly / indirectly from the following data subjects:

- Prospective clients who enquire about our financial services
- Clients who have appointed the representative as their broker

Personal information is collected directly from you through the completion of an application form, online forms, during consultations. These forms are completed either electronically or in hard copy. You may also be requested to provide your personal information during your consultation with a representative.

We may also collect information about you from other sources such as external third parties and from cookies on our website.
Law authorising or requiring collecting of the personal information:

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Insurance Act 18 of 2017;

- Short-Term Insurance Act 53 of 1998;
- Long-Term Insurance Act 52 of 1998;

Purpose for Processing your Information

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and the FSP
- Providing you with advice, products and services that suit your needs as requested
- To verify your identity and to conduct credit reference searches
- To issue, administer and manage your insurance policies
- To process insurance claims and to take recovery action
- To notify you of new products or developments that may be of interest to you
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, insurance, income, expenditure, family history, medical information and your banking details.

Some of the aforementioned personal information may be mandatory to provide within the context of product providers' underwriting requirements and disclosures.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider.

Third parties and your personal information

We may need to share your information to third parties to provide advice, reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.
These third parties may include:

- Your employer (where applicable);
- The Compliance Officer of the organisation (where applicable);
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority;

The Transfer of your personal information outside of the Republic of South Africa

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. The third-party service providers are located in:
– Australia

We confirm that the level of protection afforded to your personal information by that third country or international organisation is equal to the protection afforded by the POPI Act.

Complaints and objections

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed (please request Annexure A by emailing us at info@investonline.co.za);
- Request that we consider your objections to the processing of your personal information (please request Annexure B by emailing us at info@investonline.co.za);
- Lodge a complaint with the Information Regulator (please request Annexure B by emailing us at info@investonline.co.za).

The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.
For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.
Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula
Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Email: **complaints.IR@justice.gov.za**
Website: **https://www.justice.gov.za/inforeg/index.html**