



## **Privacy Notice (Full Disclosure Document)**

**1 July 2021**

### **Introduction**

In this document we set out how we collect, use, disclose, retain and protect your personal information as prescribed by the POPIA and other relevant laws.

This policy applies to our websites, social media platforms, application forms, and documents issued by us.

### **Definition of Personal Information**

We have adapted the same definition as POPIA in respect of "personal information": information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

### **How do we collect information?**

- Directly from you when you complete a product application form, electronically, telephonically or by way of a hard copy;
- Indirectly from you when you interact with us electronically by way of our websites, apps or social media platforms or other social media channels.

Please note that when you communicate with us through Facebook, WhatsApp, Instagram or Twitter, the social media platform may collect your personal information for its own purposes.

**What information do we collect:**

- Information about you: your name, identity number, age, gender, date of birth, nationality, occupation, health status, medical history. We acknowledge that the information about your health is special information This information will therefore be used strictly in accordance with applicable legislation and for insurance purposes only.
- Contact Information: your email address, phone number or physical address
- Financial information: we may process your financial information in order to process your payment commitments and to provide appropriate advice and intermediary services.

Please note that you have the right to refuse your personal information – in this case we will however not be able to provide you with our services.

**How do we use your information:**

- We use your information to execute our regulatory obligations which include compliance with anti- money laundering legislation etc. We are also required by various laws to maintain records of our clients and client dealings for a minimum of 5 years.

In order for us to provide you with the financial products that you require and to service such products, we need to collect and disclose your personal information to our Insurer, representative and third-party services providers providing VAPs.

**To the extend allowed by legislation we will use your information to:**

- ˘ Provide you with our products and services, and to maintain our ongoing relationship with you.
- ˘ Provide you with financial advice and intermediary services;
- ˘ To conclude your application which includes obtaining underwriting;
- ˘ To access check and process your claims or amendments;
- ˘ To meet all our contractual obligations with you;
- ˘ To comply with all regulatory and legislative requirements, including codes of conduct and requirements by our regulators. (Including the FSCA and Prudential Authority);
- ˘ For the prevention and detection of unlawful activity, fraud, anti-money laundering and to perform due diligence in accordance with applicable legislation.
- ˘ For audit and record-keeping purposes.
- ˘ For purposes of proof and legal proceedings.
- ˘ For any purpose related to or compatible with the above listed purposes.

### **Sharing of your information**

We will not sell, rent out or in any way trade your personal information to anybody.

We will only share your information with third parties if there is a legitimate reason to do so. We may disclose the information provided by you to the following entities:

- ˘ Our third-party services providers involved in delivering and / or administering the financial product;
- ˘ Our insurer.

### **We may share your information lawfully when required to do so:**

- ˘ To comply with relevant legislation
- ˘ To comply with any legal process
- ˘ To comply with request from regulatory authorities.

### **Security and storage of your information**

We have implemented the necessary technical and security measures to keep your information secure, accurate, current and complete. Please note that we can however not guarantee the security of any personal information that you transmit to us online or via outside platforms, you therefor do so on your own risk.

Your personal information will only be held and used for as long as we are allowed or required to hold same.

### **Your right to access information**

The Promotion of Access to Information Act (PAIA) read with POPIA offers you the right to access information held by a private or public body in certain instances. This right can be exercised in accordance with the process described in the PAIA act.

### **Correction of your personal information**

You have the right to correct, in terms of POPIA. This right should be exercised in accordance with our policy rules for amendments of information.

### **Your right to object**

You may object to our processing of your personal information on any reasonable grounds unless legislation specifically provides for such processing. Please contact our information officer in this regard.

## **Marketing**

Where you provide your personal information to us in the context of your interest in a financial product, you agree that to us sending you information on our services, promotions on similar products and services. This is however always subject to your right to opt out of receiving information from us. You may object at any time to receiving information from us by contacting our offices directly.

When you elect to opt out, please allow us 30 days to process your request.

## **Updates to our Privacy Notice**

A notice will be posted on the home page of our website whenever our Privacy Notice is changed in a material way.

## **Details of our Information Officer**

De Wet Steenkamp

Email: [dwls@act.co.za](mailto:dwls@act.co.za)

## **Details of the Information Regulator**

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein,

Johannesburg, 2001 Email Complaints:

[complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)