

VERSAFLEX INSURANCE BROKERS

PRIVACY NOTICE

Privacy Statement

Thank you for visiting our website. This Privacy Notice and Statement describes how we at Versaflex Insurance Brokers Pty Ltd (viz. “Versaflex” / “our” / “us” / “we) collect and use your personal data (viz. “you” / “your” / “user”), who we share it with, along with your choices as well as rights in relation to your personal information.

Versaflex respects the privacy of our customers’ personal information which shall be protected through the use and interaction with www.versaflex.co.za and/or any other Versaflex associated website, mobile application, social media site and/or other online service, combined with our product and service offerings that are linked to this Privacy Notice and Statement, in writing or orally, or where personal data is collected offline and/or received from third party providers.

For the purposes of this Privacy Notice and Statement, “personal information” shall be defined as set out in the Protection of Personal Information Act, No.4 of 2013 (“POPIA”).

1. About us

Versaflex Insurance Brokers Pty Ltd, Company Registration No: 2006/010521/07 is located at The White House – W8, 40 Kerk Street, Kempton Park, 1619, in Gauteng, South Africa and is an authorised Financial Services Provider (“FSP”) in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 (“FAIS”) – FSP Licence No. 36995. Versaflex has established a centralised data processing structure for its business. Personal information processed by it will form part of the data of Versaflex as a whole and may be used for the purposes described in this Privacy Notice.

Our Privacy Notice has been developed to provide a framework for the appropriate level of data privacy and protection to our customers and users of our website. Consequently, it represents a commitment of our endeavours to comply with South Africa’s data protection legislation and where applicable, any other worldwide data protection laws, in an endeavour to achieve the highest standards in protecting your personal information.

2. What is personal information

Personal information ("PI") is defined in POPIA as information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, and includes any information that identifies or relates specifically to you, including, for example, your name, age and identity number or other national identifier, your contact address, your location, your banking details, e-mail and contact numbers. In short, personal information refers to any information that identifies a person or specifically relates to a person.

Some types of personal information are considered special personal information. These include personal information revealing or related to a person's health, racial or ethnic origin, religious or philosophical beliefs, sex life, political affiliation, or trade union membership; criminal behaviour and proceedings related thereto.

3. The PI we process

We will only process your personal information for lawful purposes relating to our business in any one or more of the following circumstances:

- you are a new or existing customer on our customer database. This means you have purchased an insurance-related product from us or used our services;
- where you communicate, interact and/ or transact with us, our strategic partners, value-added product and/or service providers;
- if, and where required, you have consented thereto;
- if you have not requested that we refrain from processing your personal information;
- if a person legally authorised by you, the law or a court, has consented thereto;
- if it is necessary to conclude or perform under a contract, we have with you;
- if the processing is for statistical or research purposes;
- if the law requires or permits it; and/or
- if it is required to protect or pursue your, our or a third party's legitimate interest.

We may process your special personal information in any one or more of the following circumstances:

- if you have consented to the processing;
- if the processing is needed to create, use or protect a right or obligation in law;

- if the processing is for statistical or research purposes and all legal conditions have been met;
- if the special personal information was made public by you;
- if the processing is required by law;
- if the processing is required to identify you; and/or
- if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

4. What we collect

We collect a several of types of personal information for the purposes stated in this Privacy Notice, including:

- identifiers and contact information, such as your identity number, name, address, phone number/s, and/or email address;
- insurance and/or other commercial related information, such as the products and/or services you purchase and/or use, delivery address, and contact information;
- payment information, such as your payment method and related information (such as bank account, debit or credit card number), and billing address;
- profile information, which may include contact and preference information as well as information about the products and services you have purchased and/or used in interactions with ourselves and/or our strategic partners;
- communications and interactions, which may include e-mail messages, text messages, and phone calls that we and/or our strategic partners and/or service providers exchange with you;
- demographic information, which may include age or birthdate, gender, postal code, your status as a customer, and other insurance-related information about you; and
- website browsing activity (collectively, "automatically collected information"). Automatically collected information may include IP addresses, cookie identifiers, browser settings and information, and Internet Service Provider ("ISP") information. Automatically collected information also may include information about when and how you access and use our website, such as the date and time

of your visit or use, how you navigate and what you search for when using our website.

You can choose not to provide personal information to us when requested. However, if this personal information is necessary to provide you with services and products and/or offers regarding the aforesaid, and/or to perform administrative functions, we may as a consequence be unable to perform such services.

5. How we use your PI

We use your personal information for the following reasons but always in line with our business and the purpose for which it is collected:

- to enable the conclusion, implementation and enforcement of transactions you enter into with us or our strategic partners for insurance-related products and services;
- to respond to your enquiries and/or complaints;
- to lodge and/or process claims;
- to provide information about insurance-related products and/or services you have requested and notifying you about important changes or developments to these products and/or services;
- to follow-up as part of our customer care and/or claims process;
- to update your records on our customer database and/or internal records;
- to administer insurance-related product and service offerings as well as related transactions we make and/or enter into with you;
- to improve our products, services and/or distribution channels;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and/or rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- sending marketing and other communications with the latest specials, deals, alerts, notifications and promotions in relation to our business, products and services, for marketing those products and services and to market related products, goods and services to you;
- to develop, test and improve products and services for you and making our services or those of our strategic partners and/or service providers easier for you to use;

- to detect, prevent and report theft, fraud, money laundering and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information or avoiding liability by way of deception;
- to enforce and collect on any agreement when you are in default or in breach of the agreement terms and conditions, for the purposes of tracing you or to institute legal proceedings against you;
- to evaluate the effectiveness of our marketing and for the purpose of research, training and statistical analysis;
- for historical, statistical and research purposes, such as market segmentation;
- to record and/or assist appointed payment processors to process instructions payment instructions (i.e. debit order or EFT);
- to manage and maintain your relationship with us;
- to enable us to deliver products, services, documents or notices to you;
- for security, identity verification and to check the accuracy of your personal information;
- to communicate with you and carry out your instructions and requests;
- to enable you to take part in and make use of value-added products and services; and/or
- for any other related purposes.

6. Your rights

You have the right to:

- information about your personal details.
- access free of charge the information about yourself stored by us and its use.
- correct, destroy, or delete this data as permitted in law.
- opt-out of direct marketing calls or mail.
- remove your data from a direct marketing list.
- object on reasonable grounds to the processing of your personal information.
- withdraw your consent to the processing of your personal information.

By clicking on the PAIA tab / link on the main page of our website, you may refer to our Promotion of Access to Information Act No. 2 of 2000 Manual ("PAIA Manual") for access to your PI and further information.

You also have the right to lodge a complaint with the Information Regulator about how we process your personal information. E-mail: complaints.IR@justice.gov.za

7. Our safeguards to secure your PI

We will take all reasonable and appropriate technical and organisational steps to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, misuse, unauthorised disclosure, loss, interference, destruction or damage, alteration, disclosure or access.

Our security systems are in line with industry standards and we monitor developments to ensure that our security systems evolve, as required. We also test our systems regularly.

Personal information is destroyed or anonymised when no longer needed or when we are no longer required by law to retain it (whichever is the later).

We will promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information.

Where storage is in another country, your personal information will be stored in a jurisdiction that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to observe data protection requirements equivalent to or better than those applicable in South Africa.

Notwithstanding the above, no data transmission over the Internet or data storage system can be guaranteed to be completely secure. Please do not send us sensitive information via email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any personal and/or policy information you have with us has been compromised), you must immediately notify us of the problem by contacting us at privacy@versaflex.co.za

8. How long we retain your PI

We will retain your personal information for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain personal information, or as part of an investigation or for litigation purposes;
- Personal information is needed to maintain accurate business and financial records;
- There are automated means to enable you to access and delete your personal information at any time;
- You have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.

We will continue to treat your personal information in accordance with this Privacy Notice so long as we retain it.

9. Sharing your PI

In general, we will only share your personal information if any one or more of the following apply:

- if the law allows it;
- if, where necessary, you have consented to this;
- if it is necessary to conclude or perform under a contract that we or our strategic partners, value-added product or service providers have with you;
- if the law requires it; and/or
- if it's necessary to protect or pursue your, our or a third party's legitimate interest.

Where required, we may share your personal information with the following persons. These persons have an obligation to keep your personal information secure and confidential:

- business units, divisions, and/or a representative office of Versaflex, and any of our associates, cessionaries, delegates or successors in title or duly appointed third parties such as authorised agents, advisors, partners, service providers and contractors for any of the purposes identified in this Privacy Notice;
- strategic partners, value-added product and/or service, and/or any other duly appointed service provider;
- other members of Versaflex Insurance Brokers for any of the purposes identified in this Privacy Notice;
- our brokers and/or employees in their performance of their duties;

- attorneys and other persons that may assist with the enforcement of agreements;
- payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions;
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and/or the prosecution of crime;
- regulatory authorities, industry ombuds, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with;
- credit bureaux or other similar verification agencies;
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you;
- persons to whom we have ceded our rights or delegated our obligations to under agreements, like where a business is sold;
- courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- trustees, executors or curators appointed by a court of law; and/or
- our joint venture and other partners with whom we have concluded business arrangements.

10. Cookies and Similar Technologies

When you access our Online Services or Sites (“Sites”), we may use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links and web beacons. We may use cookies to assist us with activities such as:

- Authenticating you;
- Keeping track of information, you have provided to us;
- Improving your browsing experience;
- Customising our interactions with you;
- Storing and managing your preferences and settings;
- Compiling statistical data;
- Analysing the performance and usability of our Sites;
- Measuring traffic patterns for our Sites; and
- Determining which areas of our Sites have been visited.

The information that we collect using cookies is non-personal information. We do not allow third parties to place cookies on our websites.

Our Sites may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your activities across our Sites to help us compile aggregated statistics.

11. Direct marketing

We may send you direct marketing communications about our products and services as well as new products, special offers and other information. We will do this in person, via e-mail, SMS, WAP Push, newsletters, and/or telephonically.

You may opt-out of receiving marketing materials from us at any time and manage your communication preferences by:

- Following the unsubscribe instructions included in each marketing communication from us or telling us you want to unsubscribe;
- Sending an email to the sender of the marketing communications; or
- Including your details and a description of the marketing material you no longer wish to receive from us.
- We will comply with your request as soon as is reasonably practicable.

If you elect to opt-out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our products and services which you will be unable to opt-out of.

We do not provide your personal information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal information commercially available to unaffiliated third parties.

In all cases you can request us to stop sending marketing communications to you at any time.

If we are providing you with products or services, you will also be subject to the specific terms and conditions relating to the product or services and those terms will include additional information as to how we or any of our strategic partners and/or service providers may contact you.

If the reason you have given us personal information is to receive marketing or other communications from us, we will continue to provide this information to you unless you ask us not to do so.

12. How to contact us

If you have any questions about how your personal data is handled by Versaflex, you have a privacy concern or you wish to make a request or a complaint relating to your personal data, please contact our Information Officer at the following email address: privacy@versaflex.co.za

13. Date of publishing

Last updated: 1 June 2021.