

PRIVACY POLICY

This Policy is owned by

IUA BUSINESS SOLUTIONS (PTY) LTD

a duly authorised Financial Services Provider Licence Number 15737

(hereinafter referred to as IUA)



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1. Definitions

To assist you in understanding this policy, please note the explanations below:

“Consent” means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;

“Data Subject” means the person to whom Personal Information relates;

“Person” means a natural person or a juristic person to whom the Personal Information belongs to;

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to–

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, IP address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person;

“Process or Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation; or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

“Promotion of Access to Information Act” means the Promotion of Access to Information Act, No 2 of 2000.

2. Introduction

IUA recognises the importance of protecting your Personal Information and is committed to respecting your privacy. IUA will use Personal Information only to the extent required in the normal course of business.

IUA defines Personal Information as all information specific to yourself, any information that may be used to identify you as an individual, as defined by the Protection of Personal Information Act (POPIA).

This Privacy Policy relates to the collection, processing and storage of Personal Information which you supply directly or indirectly, through employment or through the use of our administrative services, and the manner in which your Personal Information will be utilised.

3. Requirements for lawful processing according to the POPI Act

IUA is required to meet the following conditions for lawful processing of Personal Information:

1. Accountability
2. Processing limitation
3. Purpose specification
4. Further processing limitation
5. Information quality
6. Openness
7. Security safeguards
8. Data subject participation

4. Accountability

IUA stipulates that the Information Officer is the accountable party for all requirements under the POPI Act and has nominated responsible parties within IUA with the responsibility of ensuring the rest of the conditions are in place before processing data. These responsible parties must also ensure compliance, both, when deciding to process data and during the processing of the data.

Data processors within IUA have ownership under IUA's processes and procedures for data they receive and process on behalf of IUA and its customers and partners.

5. Processing limitations (Information Collection)

IUA receives Personal Information from individuals such as potential employees and customers who IUA act on behalf of their business partners. IUA only uses Personal Information if it has been collected in accordance with acceptable privacy practices consistent with this Policy, conclusion or performance of various agreements and applicable laws.

When Personal Information is collected directly by IUA, IUA will inform all parties of the purpose for the collection at the point of collection.

The Personal Information IUA collects includes but is not limited to:

- name and surname
- identity number
- email address
- physical and or postal address
- bank details
- other Personal Information

Sensitive information relating to medical records and minors are also collected in the scope and nature of the services IUA provides.

6. Purpose Specification (How we use information collected)

IUA will only use Personal Information for the purposes of fulfilling the services it provides to its customers and business partners.

IUA collects and uses Personal Information:

- For security, identity verification and to check the accuracy of the data subject's information
- To communicate with the data subject and carry out their instructions and requests
- To fulfil a legitimate business interest by administering, managing and maintaining policies and/or plans on behalf of various Business Partners
- To carry out actions for the conclusion or performance of your policy/plan claim
- To process payment instructions (collecting premiums via debit order)
- To detect, prevent and report theft, fraud, money laundering and other crimes
- To comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests

7. Further Processing

IUA will only process information in ways compatible with the purpose stated in condition 3.

IUA may be required to further process information outside of its normal processing conditions as stated in condition 3 with the data subject's consent, applicable to the following conditions:

- Where the law requires such further processing
- The information came from the public record
- The processing is related to national security

8. Information Quality

IUA will take steps to ensure that all the information collected is accurate and complete.

9. Openness

Under the requirements of the Promotion of Access to Information Act (PAIA), IUA will maintain strict documentation of all the processing activities undertaken as part of normal business operations and will ensure that data subjects know when information is collected and how it is collected.

Before collecting information, IUA will ensure that the required information is visible to all data subjects as outlined in this Privacy Policy and as follows:

- Where IUA collects information
- Where IUA does not collect information
- The source of IUA's information
- IUA's full company name and address
- Why IUA collects the data (business purpose)
- Whether the collection is voluntary or mandatory
- What happens if the data subject does not provide their data
- Laws that allow data collection
- If and when IUA intends to send the data to a third country

9.1 Sharing of information

IUA will not transfer Personal Information to third parties without the data subject's consent, except under the limited conditions described below.

Inside IUA, data is stored in controlled servers with limited access.

The following is a non- exhaustive list of examples when IUA may disclose Personal Information:

- Information relating to claims, insurance and financial history with other insurers, government bodies and credit bureaus
- Regulatory authority requests
- To comply with any regulation passed under relevant legislation, or any legal process
- To enforce and protect IUA's rights and property (including intellectual property) and/or where IUA has a legitimate interest to do so
- When the data subject has expressly authorised IUA to do so

9.2 Retention of information

IUA retains information in accordance with the required retention periods stipulated in law and/or for legitimate business purposes. IUA will only retain information for the purposes explicitly set out in this policy. IUA may keep information indefinitely in a de-identified

format with established and appropriate safeguards for statistical purposes. This policy also applies when IUA retains information.

10. Security Safeguards (Protection of Information)

IUA values Personal Information and keeps apprised with the latest global developments in security technology. IUA takes all reasonable steps to protect a data subject's Personal Information from loss, misuse or unauthorised alteration.

The Personal Information that IUA retains is stored in databases that have built-in safeguards to ensure the privacy and confidentiality of the information.

IUA prevents unauthorised access to your Personal Information by:

- Encrypting all transaction channels
- Bi-annually reviewing all accounts authorised upon registration
- Protecting policyholder (data subject) accounts with one-time pins (two factor authentication)
- Regularly testing its websites, data centres, systems, and other assets for security vulnerabilities.

10.1 Cookies

IUA may use a standard technology called a "cookie" to collect information about how data subjects use our website. A cookie is a small data file that certain websites write to a data subject's hard drive when visiting the site. A cookie file can contain information such as a user ID that the site uses to track the pages a data subject has visited, but the only Personal Information a cookie can contain is information a data subject supplies themselves. A cookie cannot read data off a data subject's hard disk or read cookie files created by other sites. Some parts of IUA's website use cookies to track user traffic patterns. IUA does this to determine the usefulness of its website information to its users and customers and to see how effective the website structure is in assisting customers and partners attain information.

10.2 Security breach

IUA will report any breach to the Information Regulator and the impacted data subject, or any company/entity involved within 72 hours.

IUA customers and business partners may report any concerns about IUA's privacy practices or if there is a suspected breach regarding Personal Information. Kindly notify IUA by sending an email to popia@iua.co.za.

11. Data Subject Participation and Rights

As stated in condition 6, under the law, data subjects have the right to access their Personal Information, including learning what information IUA has about them.

The data subject also has the right to request for their Personal Information records to be corrected or deleted when:

- the data is inaccurate
- the data is irrelevant
- the data is excessive
- the data is out of date
- the data is incomplete
- the data is misleading
- the data is obtained unlawfully or is no longer authorised to be kept

The data subject must inform IUA of their request by sending an email to admin@iua.co.za.

The data subject may object on reasonable grounds to the processing of their information. The data subject may not object to the processing of their information if they have provided consent or legislation requires the processing. The data subject must inform IUA of their objection at the contact details provided above.

The data subject has the right to withdraw their consent which allows IUA to process their information, however, IUA will continue to process their information if permitted by law.

The data subject has a right to file a complaint with IUA or the Information Regulator about an alleged contravention of the protection of their information.

IUA's Complaints Department details are as follows:

Tel: 031 570 7600 Email: complaints@iua.co.za

The Information Regulator's (South Africa) Complaints details are as follows:

Tel: 010 023 5200 Email: POPIAComplaints@info regulator.org.za

11.1 Prohibition of the processing of special Personal Information

IUA will not collect or process special Personal Information including religious beliefs, health information, biometric information, or criminal behaviour.

The only exceptions that apply to IUA collecting this information includes:

- If the data subject provided consent
- If processing is necessary for establishing a defence of a right
- If processing is required for fulfilling obligations under international public law
- If processing is in the public interest
- If the data is already public (through the data subject correctly)
- If processing involves historical research, or statistical purposes (within the public interest or if asking consent is impossible or close to impossible)

11.2 Data collection of children

IUA will not process children's Personal Information unless:

- IUA has the consent of a legally appointed "competent person" who has the right as a parent or guardian of the child
- It is necessary for obligations under the law
- It is required for upholding international public law
- It is necessary for research purpose

12. Governance Requirements

Policy Review Frequency

This policy will be reviewed when there is a material change to the business of IUA or when there is a change in legislation but will be reviewed at least annually.

Policy Revision History

Version	Date	Nature of Revision
1.0	25 June 2021	New Policy

Policy Ownership and Approval

Owner	Designation
Nicky Mottram	Legal and Compliance Manager
Approved By	Date
IUA Executive Committee	2 May 2023

