

PRIVACY NOTICE / POLICY

(Notice to Stakeholders: how the FSP processes Personal Information in terms of the Protection of Personal Information Act, Act 4 of 2013 (PoPI))

At **Vaal Triangle Insurance**, we are committed to protecting the privacy and safeguarding the integrity and confidentiality of all stakeholders' personal information.

We hereby assure all stakeholders that any personal information provided to or used by us will be processed safely and lawfully, and declare our commitment to the following:

The Purpose of Collecting and Processing Personal Information?

We shall not process your personal information without your consent and shall only use your information for the purpose it was provided. If, for any reason, you think that your information is not being used as intended or incorrectly or is out of date, please notify our information officer at the contact details below.

What is Personal Information, and which Information do we use?

In terms of POPI, Personal Information is defined as: information relating to a natural/juristic person, including, but not limited to:

1. information relating to the race, gender, sex, pregnancy, marital status, nationality, 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;
2. information relating to the education or the medical, financial, criminal, or employment history of the person;
3. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other assignment to the person;
4. the biometric information of the person;
5. the personal opinions, views, or preferences of the person;
6. 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;
7. the views or opinions of another individual about the person; and
8. 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.

Please Note: At **Vaal Triangle Insurance**, the information we use is limited to items 1 – 4 above and only insofar as the information required is compatible with the purpose of collection.

We shall not market to you or provide your information to any third parties for marketing or commercial purposes without your consent, except as part of a specific program or feature which you will specifically be able to opt out of.

Protecting your Personal Information

In terms of legislation, we are obliged to implement measures and strategies to ensure the protection of your personal information, whereby unauthorised access and use are deterred. Our security and safeguards policies and procedures include the following:

- Physical security of assets and records;
- Computer and network security;
- Limited access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we obtain assurances and or impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for is secured. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to and committed to doing.

Access to Personal Information

You may contact our offices to enquire what personal information we hold for you. We shall make the information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

Correction of Personal Information

We are obliged to store information that is accurate and updated. You may update, correct, amend, or delete any personal information provided to us at any time. We will take all reasonable steps to confirm your identity before making changes to personal information.

OUR INFORMATION OFFICER'S CONTACT DETAILS

NAME AND SURNAME:	Francois Miles
CONTACT NUMBER:	016 981 3331
EMAIL ADDRESS:	francois@vtinsurance.co.za

Retention of Data

We will retain your personal information only for as long as is necessary for the purposes set out in this Notice or to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We may also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Sites and/or Portals, or we are legally obligated to retain this data for longer periods.

Termination

Should you at any point wish to revoke any consent provided to us to use your personal information, please contact us and we will assist you accordingly.

Amendments

Please note that we may amend this notice from time to time and will send out communication to this effect, should it be necessary.

Direct Marketing

We may communicate with you using email, SMS, and other channels (sometimes through automated means) as part of our effort to market our products or services, administer or improve our products or services, or for other reasons stated in this Privacy Notice. You have an opportunity to withdraw consent to receive such direct marketing communications, as permitted by law.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt out by submitting a request through to our office, or by using the UNSUBSCRIBE link in any email communication you may have received. Further, you may express your communication preferences by:

- Noting your preferences at the time you register your account with the Site [or our mobile application];
- Logging into your account settings and updating your preferences;
- **Contacting our office at 016 981 3331 or e-mail to office@vtinsurance.co.za**

Please note that you may continue to receive non-marketing communications as may be required to maintain your relationship with us.

In addition to the communication described here, you may receive third-party marketing communications from providers we have engaged to market or promote our products and services. These third-party providers may be using communications lists they have acquired on their own, and you may have opted in to those lists through other channels. If you no longer wish to receive emails, SMSs, or other communications from such third parties, you may need to contact that third party directly.

Website Usage

When you use our website, we may record unique identifiers associated with your device (such as the device ID and IP address), your activity within the Service, and your network location. We use aggregated information (such as anonymous user usage information, cookies, IP addresses, browser type, clickstream information, etc.) to improve the quality and design of the Service and to create new features, promotions, functionality, and services by storing, tracking, and analyzing user preferences and trends. Specifically, we may automatically collect the following information about your use of the Service through cookies, web beacons, and other technologies:

- domain name
- browser type and operating system
- web pages you view
- links you click
- IP address
- the length of time you visit the Sites, Portals, and/or Services
- the referring URL or the webpage that led you to the Sites

We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party service providers may do so on our behalf).

In addition, we may use "cookies," clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Service, and the portion of the Service you choose to use. A cookie is a small text file that is sent by a website to your computer or mobile device, where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site. Your browser has options to accept, reject, or provide you with notice when a cookie is sent. Our cookies can only be read by us; they do not execute any code or virus, and **they do not contain any personal information**. Cookies allow us to serve you better and more efficiently, and to personalize your experience with the Service. We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Service, and to deliver content (which may include third-party advertisements) specific to your interests.

We may use third-party service providers to help us analyse certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyse visitor activity on the Service. We may permit these service providers to use cookies and other technologies to perform these services for us. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

Complaints

You have the right to address any complaints you may have regarding your personal information to our office at **016 981 3331** or email office@vtinsurance.co.za, or to our Information Officer at francois@vtinsurance.co.za. Alternatively, you may contact the Information Regulator:

The Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Email: enquiries@info regulator.org.za

Phone: 010 023 5200