

Consort Technical Underwriters

Consort Data Privacy (POPI Policy)

CONSORT DATA PRIVACY (POPI POLICY)

COMPANY POLICY

1. Introduction

Consort Technical Underwriting Managers (Pty) Ltd ("Consort") needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards, and how to comply with the law.

2. Why this Policy exists

This data protection policy ensures Consort:

- Complies with data protection law and follow good practice;
- Protects the rights of staff, customers and partners;
- Is open about how it stores and processes individuals' data; and
- Protects itself from the risks of a data breach Privacy law

The Protection of Personal Information Act, 2013 describes how organisations, including Consort, must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Consort has made a commitment to respect the privacy rights of individuals by ensuring that their personal information is collected, used and disclosed in such a manner that a reasonable person would consider appropriate in the circumstances.

The Protection of Personal Information Act (POPIA). This Privacy Policy is based on the principles and rules set out in the Act.

Following the Definitions section in this policy document, there are 10 separate policy statements, along with a series of procedural rules which accompany each policy.

3. Definitions

“Broker” means the brokerage organization responsible for abiding by and implementing the policies and procedures in this policy document, and includes the officers and employees of the brokerage.

“Client” means an individual who engages a Broker to acquire or renew a policy of insurance.

“Conditions” means the Conditions of Lawful Processing stipulated in Chapter 3 of the Act, unless the context indicates a contrary meaning:

- Accountability
- Processing limitation
- Purpose specification
- Further processing limitation
- Information quality
- Openness
- Security safeguards
- Data subject participation

“Data Subject” means the person to whom personal information relates.

“Operator” means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“Person” means a natural person or a juristic person.

“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, physical address, telephone number or other particular assignment to the person;
- d. the blood type or any other 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

“Privacy Officer / Information Officer” means the individual or individuals appointed from time to time by the Underwriter to be accountable for the Broker’s/Insurers/Underwriting Managers compliance with the policies and procedures contained in this policy document.

“Process” means any operational activity concerning personal information including the collection, organisation, storage, modification, communication and destruction of information. (The definition in POPIA is wide and is intended to cover all manner of processing.)

“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 merging, linking, as well as restriction, degradation, erasure or destruction of information;

“Public record” means a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body;

“Record” means any recorded information:

- a. regardless of form or medium, including any of the following:
 - i. Writing on any material;
 - ii. information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - iii. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - iv. book, map, plan, graph or drawing;
 - v. photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
- b. in the possession or under the control of a responsible party;
- c. whether or not it was created by a responsible party; and regardless of when it came into existence;

“Regulator” means the Information Regulator established in terms of the Act; **“Responsible Party”** means a person who determines the purpose of and means of processing personal information (typically, but not always, the collector of information).

This privacy policy describes how we handle Personal Information that we collect from your application and claim forms, telephone calls, e-mails and other communications with us, as well as from claim investigators, medical professionals, our website, witnesses or other third parties involved in our business dealings with you

4. Policy Scope

This policy applies to:

- The head office of Consort;
- All branches of Consort;
- All staff and volunteers of Consort;
- All contractors, suppliers and other people working on behalf of Consort

It applies to all data that the company holds relating to identifiable individuals and juristic persons

4. Personal Information that we collect

Depending on your relationship with us (for example, as a consumer policyholder; non-policyholder insured or claimant; witness; commercial broker or appointed representative; or other person relating to our business), Personal Information collected about you and your dependents may include:

General identification and contact information

Your name; address; e-mail and telephone details; gender; marital status; family status; date of birth; passwords; educational background; physical attributes; activity records, such as driving records; photos; employment history, skills and experience; professional licenses and affiliations; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.

Identification numbers issued by government bodies or agencies

Identification number (ID); passport number; tax identification number; military identification number; or drivers or other license number.

Financial information and account details

Payment card number; bank account number and account details; credit history and credit score; assets; income; and other financial information.

Medical condition and health status

Current or former physical or mental or medical condition; health status; injury or disability information; medical procedures performed; personal habits (for example, smoking or consumption of alcohol); prescription information; and medical history.

Other sensitive information

In certain cases, we may receive sensitive information about your trade union membership, religious beliefs, political opinions, family medical history or genetic information (for example, if you apply for insurance through a third-party marketing partner that is a trade, religious or political organization). In addition, we may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs).

Telephone recordings

Recordings of telephone calls to our representatives and call centres.

Information to investigate crime, including fraud and money laundering

For example, insurers commonly share information about their previous dealings with policyholders and claimants for this purpose

Information enabling us to provide products and services

Location and identification of property insured (for example, property address, vehicle license plate or identification number); travel plans; age categories of individuals you wish to insure; policy and claim numbers; coverage/peril details; cause of loss; prior accident or loss history; your status as director or partner, or other ownership or management interest in an organization; and other insurance you hold.

Marketing preferences and customer feedback

You may let us know your marketing preferences, enter a contest or prize draw or other sales promotion, or respond to a voluntary customer satisfaction survey.

5. From whom do we collect the Personal Information

Personal information will be collected directly from the data subject, except if:

- a. the information is contained in a public record or has deliberately been made public by the data subject;
- b. the data subject has consented to the collection of the information from another source;
- c. collection of the information from another source would not prejudice a legitimate interest of the data subject;
- d. collection of the information from another source is necessary:
 - i. to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - ii. to enforce a law imposing a pecuniary penalty;
 - iii. to enforce legislation concerning the collection of revenue as defined in local tax legislation;
 - iv. for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
 - v. in the legitimate interests of national security; or
 - vi. to maintain the legitimate interests of the responsible party or of a third party to whom the information is supplied;
- e. compliance would prejudice a lawful purpose of the collection; or
- f. compliance is not reasonably practicable in the circumstances of the particular case.

6. How we use Personal Information

We may use this Personal Information to:

- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies, other terms and conditions, the Site and other administrative information.
- Make decisions about whether to provide insurance; provide insurance and assistance services, including claim assessment, processing and settlement; and, where applicable, manage claim disputes.
- Assess your eligibility for payment plans, and process your premium and other payments.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- Carry out market research and analysis, including satisfaction surveys.

- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.
- Personalize your experience on the Site by presenting information and advertisements tailored to you.
 - Identify you to anyone to whom you send messages through the Site.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Establish and defend legal rights; protect our operations or those of any of our group companies or insurance business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.

7. International Transfer of Personal Information

Due to the global nature of our business, for the purposes set out above we may transfer Personal Information to parties located in other countries (including the United Kingdom, United States and other countries that have a different data protection regime than is found in South Africa). We may transfer information internationally to our group companies, service providers, business partners and governmental or public authorities.

8. Sharing of Personal Information

Consort may make Personal Information available to:

Our group companies

Consort and Lombard Insurance Company Limited ("Lombard") are responsible for the management and security of jointly used Personal Information. Access to Personal Information within Lombard is restricted to those individuals who have a need to access the information for our business purposes.

Other insurance and distribution parties

In the course of marketing and providing insurance, and processing claims, Consort may make Personal Information available to third parties such as other insurers; reinsurers; insurance and reinsurance brokers and other intermediaries and agents; appointed representatives; distributors; affinity marketing partners; and financial institutions, securities firms and other business partners.

Our service providers

External third-party service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; call centre service providers; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; third-party claim administrators; document and records management providers; claim investigators and adjusters; construction consultants; engineers; examiners; jury consultants; translators; and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

Governmental authorities and third parties involved in court action

Consort may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate:

- a. to comply with applicable law, including laws outside your country of residence;
- b. to comply with legal process;
- c. to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- d. to enforce our terms and conditions;
- e. to protect our operations or those of any of our group companies;
- f. to protect our rights, privacy, safety or property, and/or that of our group companies, you or others;
and
- g. to allow us to pursue available remedies or limit our damages.

Other Third Parties

We may share Personal Information with payees; emergency providers (fire, police and medical emergency services); retailers; medical networks, organizations and providers; travel carriers; credit bureaus; credit reporting agencies; and other people involved in an incident that is the subject of a claim; as well as purchasers and prospective purchasers or other parties in any actual or proposed

reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock. To check information provided, and to detect and prevent fraudulent claims, Personal Information (including details of injuries) may be put on registers of claims and shared with other insurers. We may search these registers when dealing with claims to detect, prevent and investigate fraud.

Personal Information may also be shared by you, on message boards, chat, profile pages and blogs, and other services on the Site to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public information, and may be available to visitors to the Site and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the Site.

9. Security

Consort will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), please immediately notify us. (See the “Who to Contact About Your Personal Information” section below.) When Consort provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

10. Retention of Personal Information

Consort takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Policy. Consort will retain Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

11. Marketing Preferences

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. You can also contact us by e-mail at info@consort.co.za or by writing to the Data Protection / Compliance / Information Officer, to tell us your marketing preferences and to opt-out. If you no longer want to receive marketing-related e-mails from Consort on a going-forward basis, you may opt-out of receiving these marketing-related emails by clicking on the link to “unsubscribe” provided in each e-mail or by contacting us at the above addresses.

We aim to comply with your opt-out request(s) within a reasonable time period. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of third parties with whom we have already shared your Personal Information (i.e., to those to whom we have already provided your Personal Information as of the date on which we respond to your opt-out request). Please also note that if you do opt-out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt-out

12. Access and Correction Requests, Questions and Concerns

In certain countries, an individual may have the right to access, correct, object to the use of, or request deletion or suppression of Personal Information on certain grounds. Please contact us as set out in the “Who to Contact About Your Personal Information” section below with any such requests or if you have any questions or concerns about how we process Personal Information. Please note that some Personal Information may be exempt from access, correction, objection, deletion or suppression rights in accordance with local privacy and data protection laws

13. Other information we may collect through our website

“Other Information” is any information that does not reveal your specific identity, such as:

- Browser information;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you; and
- Aggregated information
- Other Information

We Collect We and our third-party service providers may collect Other Information in a variety of ways, including:

Through your internet browser:

Certain information is collected by most websites, such as your IP address (i.e., your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, time of the visit and the page(s) visited. We use this information for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

Using cookies:

Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and to collect information such as internet browser type, time spent on the Site, pages visited, language preferences, etc. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, or to gather statistical information about the usage of the Site. Cookies further allow us to present to you the advertisements or offers that are most likely to appeal to you. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites.

Using pixel tags, web beacons, clear GIFs or other similar technologies:

These may be used in connection with some Site pages and HTML-formatted e-mail messages to, among other things, track the actions of Site users and e-mail recipients, measure the success of our marketing campaigns and compile statistics about Site usage and response rates.

From you:

Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.

By aggregating information:

We may aggregate and use certain information (for example, we may aggregate information to calculate the percentage of our users who have a particular telephone area code).

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then, in addition to the uses listed in the "Other Information We Collect" section above, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

14. Who to contact about your personal information

If you have any questions about our use of your Personal Information you can e-mail or write to The Data Protection / Information / Compliance Officer:

Name: Graham Charlton

E-mail address: graham@consort.co.za

Telephone number: (011) 658-1156

15. Changes to this Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website