

INDEQUITY SPECIALISED INSURANCE LIMITED

Privacy Statement

Introduction

This Privacy Statement sets out how Indequity Specialised Insurance Limited (“Indequity”, “we”, “us” and “our”) uses, discloses and protects any personal information that you provide or that we collect, when you use our website or that we collect directly from you.

We collect personal information to be able to provide you with appropriate insurance cover and related services, based on your own risk profile and to ensure that we have the correct and most up to date information.

“Personal Information” means information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person.

This Privacy Statement describes how we handle personal information that we collect from you, through our website and through other means (for example, from completed proposal forms, claim forms, telephone calls, emails and other communications with us, as well as from third parties involved in our business dealings with you).

We are committed to ensuring that your personal information is protected. If we ask you to provide certain information by which you can be identified when engaging with us or using our website, it will only be used in accordance with this Privacy Statement. If you do not wish to provide personal information to us then you do not have to do so, but it may affect the services we are able to provide to you, your use of our website or the products and services offered on the website.

Indequity recognises the importance of protecting your personal information and as such subscribes to the principles, outlined in applicable privacy regulations, that governs your right to having your personal information kept private.

Collection of personal information

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

- (a) Your personal information is contained in a public record or has deliberately been made public by yourself;
- (b) You have consented to the collection of the information from another source;
- (c) The collection of the information from another source would not prejudice your legitimate interest;
- (d) Where the 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.

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

- your name;
- address;
- ID numbers;
- email and telephone details;
- gender;
- health status;
- marital status;
- family status;
- date of birth;
- registration numbers;
- educational background;
- physical attributes;
- activity records, such as driving records;
- photos;
- employment history, skills and experience;
- current or former physical or mental or medical condition;
- professional licenses and affiliations;
- financial information and banking details such as account numbers;
- relationship to the policyholder, insured or claimant; and
- date and cause of death, injury or disability.

In certain cases, we may receive sensitive information about your trade union membership, religious beliefs, political opinions, family medical history or genetic information. 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).

How we use your personal information

We may use your 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, our website and other administrative information;
- Make decisions about whether to provide insurance; provide insurance services and assistance services, including claim assessment, processing and settlement; and, where applicable, manage claim disputes;
- To 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;
- Identify you to anyone to whom you send messages through our website;
- 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.

Sharing your personal information

Indequity does not and will not sell or provide your personal information to third parties for independent use. We may, however, share your personal information with our business partners if that information is required to provide the product or service you have requested. However, our business partners will adhere to using your information only as directed by Indequity.

The following list includes but is not limited to some of the instances when we disclose the personal information obtained from you:

- When any regulatory authority for the various financial sectors requests same;
- To comply with any regulation passed under relevant legislation, or any legal process;
- To enforce and protect our rights and property (including intellectual property) and/or where we have a legitimate interest to do so;
- When you have expressly authorised us to do so; or
- If we undergo a change in ownership.

Indequity may make personal information available to:

- **Our group companies**

The Indequity group of companies is responsible for the management and security of jointly used personal information. Access to personal information within Indequity 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, Indequity 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 and other business partners.

- **Our service providers**

External third-party service providers, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; IT systems, support and hosting 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**

Indequity 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, organisations 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 reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business. 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.

Transferring of your personal information internationally

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

Protecting your personal information

To help protect the privacy of data and personal information, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personally identifiable information to those employees who need to know that information to provide services or benefits to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Indequity implements appropriate technical, physical, legal and organisational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the internet or email, and no 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 notify us immediately (see the contact information section below).

When Indequity 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.

Retention of your personal information

Indequity 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 Statement. Indequity will retain personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

URL and IP address

Like many other websites, we collect information about our users' utilisation and navigation of our website. This information helps us to design our website to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse

trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Cookies

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Our website uses cookies to provide enhanced functionality on the website and aggregate traffic data (e.g., what pages are the most popular). These cookies may be delivered in a first-party or third-party context. Indequity may also use cookies in association with emails delivered by Indequity. Our website also captures limited information (user-agent, HTTP referrer, last URL requested by the user, client-side and server-side clickstream) about visits to our website; we may use this information to analyse general traffic patterns and to perform routine system maintenance. You have many choices with regard to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Inapplicability of privacy statements of any linked sites or other third parties

This Privacy Statement only addresses Indequity's use and disclosure of your personally identifiable information. As our website may contain links to other websites, please be aware that we are not responsible for the privacy practices of such other sites, and we are not liable for their misuse of personally identifiable information. We encourage you to be aware that when you access another website you should carefully read their privacy statement.

General legal notice and disclaimer

Access to the information contained on our website is provided by Indequity to its clients and non-clients as a service to provide product and contact information. References herein to any product, process or service do not constitute or imply endorsement or recommendation by Indequity. While we make every effort to present accurate and reliable information on this website, Indequity does not approve or certify such information nor does it guarantee the accuracy, completeness, efficacy, timeliness or correct sequencing of such information. Use of such information is voluntary and reliance on it should only be undertaken after an independent review of its applicability, accuracy, completeness, efficacy and timeliness with regard to users' specific needs and uses. Indequity (including its employees and agents) is not responsible for, and expressly disclaims all liability for, damages of any kind arising out of use, reference to or reliance on the information available through this website. No approvals, recommendations, endorsements, guarantees or warranties, including, but not limited to, any express or implied warranties of merchantability or fitness for any particular use or purpose of products or services named on this website are made by Indequity.

Your access to and updating of personal information

Reasonable access to personally identifiable information will be provided within 30 days at no cost to persons upon request made to Indequity at the contact information provided below. If access cannot be provided within that timeframe, Indequity will provide the requesting party a date when the information

will be provided. If for some reason access is denied, Indequity will provide an explanation as to why access has been denied (which could include, for example, a person not having a legitimate and lawful interest in accessing the information).

Conditions of use, notices and changes to our Privacy Statement

By engaging with us, making use of our services and using our website, you agree to the terms and conditions contained in this Privacy Statement and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use any Indequity services or benefits or our website. You agree that any dispute over privacy or the terms contained in this Privacy Statement, or any other agreement we have with you, will be governed by the laws of South Africa. You also agree to arbitrate such disputes in South Africa, and to abide by any limitation on damages contained in any agreement we may have with you.

As our organisation, membership and benefits may change from time to time, this Privacy Statement is expected to change as well. We reserve the right to amend the Privacy Statement at any time, for any reason, without notice to you, other than the posting of the amended Privacy Statement on our website. We may email periodic reminders of our notices and terms and conditions, but you should check our website frequently to see the current Privacy Statement that is in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this website.

Contact information and questions regarding the Privacy Statement

If you have any questions about our Privacy Statement, or any concern about privacy at Indequity or the use of our website in general, please contact us by email at info@indequity.com.