

Telesure
Investment
Holdings (Pty) Ltd

Privacy Policy



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CONTENTS

1.	POLICY OVERVIEW	7
2.	GENERAL	7
3.	PURPOSE	8
4.	CONSENT	9
5.	HOW WE PROCESS YOUR PERSONAL INFORMATION.....	9
6.	HOW WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING	11
7.	TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE BORDERS OF SOUTH AFRICA	11
8.	DISCLOSURE OF INFORMATION	11
9.	INFORMATION SECURITY	12
10.	ACCESS TO INFORMATION AND REQUEST TO CORRECT INFORMATION	13
11.	APPLICATIONS	13
12.	COOKIES	14
13.	HOW LONG WE KEEP YOUR PERSONAL DATA	14
14.	CHANGES TO THIS NOTICE	14
15.	HOW TO CONTACT US.....	14
16.	INFORMATION REGULATOR	15

1. POLICY OVERVIEW

1.1. Document Information

Title	Privacy Policy
Document Type	Policy
Document number	1.1

1.2. Document History

Date	Version	Reviewer(s)	Action/ Comments
March 2021	1.0	Danica Pretorius	Draft consolidated policy
May 2021	1.1	Eben Steyn	Review and update consolidated manual

1.3. Document Governance

Implementation	
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1.4. Document Approval History

Approved By	Document Version	Date of Approval

2. GENERAL

2.1. In this document, references to “TIH” is to Telesure Investment Holdings (Pty) Ltd and its subsidiaries. Subsidiaries of TIH includes the following:

- Auto and General Insurance Company Limited

- First for Women Insurance Company Limited
 - Budget Insurance Company Limited
 - Dial Direct Insurance Limited
 - 1 Life Insurance Limited
 - Telesure Group Services (Pty) Ltd
 - Hippo Comparative Services (Pty) Ltd
 - Hippo Advisory Services (Pty) Ltd
 - Unity Financial Services (Pty) Ltd
 - Wealthport (Pty) Ltd
 - Wealthport Nominees (Pty) Ltd
 - Rockport Capital (Pty) Ltd
- 2.2. In this document, any reference to “we” or “us” or “our” includes any one or more of the above businesses or entities.

3. PURPOSE

- 3.1. This document explains how TIH will obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).
- 3.2. TIH is committed to respecting and maintaining the privacy and security of personal and confidential information (collectively "Personal Information"/ "Information") submitted to TIH via its various channels for the rendering of any services and for the provision of any products.
- 3.3. TIH values you as a client. We will therefore treat all your Personal Information as private and confidential and undertake to deal with your Information in a responsible and lawful manner only. TIH will take all reasonable steps to prevent unauthorised access to your Personal Information. Please note that TIH will only request Personal Information required for the purposes of assessing and providing you with insurance and any related financial services. This information is essential to conclude your agreement and a legal requirement. TIH will only process your Personal Information for purposes consistent with the normal course of our business to uphold our legitimate interests.
- 3.4. TIH is required by law, to process and maintain your Personal Information in accordance with prescribed standards or generally accepted information management practices (including prescribed retention periods) to ensure that your information is complete, accurate, up to date and secure.
- 3.5. TIH will not disclose your Personal Information to any third party except in the normal course of our business where the third party is contractually bound to perform a service or provide products in accordance with your agreement with TIH or where required by law.
- 3.6. You may request access to records of your Personal Information that we maintain. TIH will make the Information available to you following receipt of your request in accordance with our Access to Information Manual. You may notify us in writing of any inaccuracies reflected in the Information that we maintain and verify, in order to correct your Information.

4. CONSENT

By making use of our services, products and service channels, you explicitly agree that we may process your personal information. You acknowledge that the personal information may be verified and / or processed for insurance, financial services and risk management purposes by TIH against any other reasonable and legitimate sources or databases to ensure the accuracy and completeness of any personal information provided on an ongoing basis.

5. HOW WE PROCESS YOUR PERSONAL INFORMATION

5.1. For the purpose of our business functions and activities we will process your personal information for the following non exhaustive list of purposes:

5.1.1. Quoting, underwriting, pricing, servicing and executing of insurance and other financial services

5.1.2. Assessment of financial and insurance risks;

5.1.3. Assessment and processing of claims and complaints;

5.1.4. Development and improvement of products and services;

5.1.5. Credit references and/or verification of personal information;

5.1.6. Fraud prevention and detection;

5.1.7. Market research and statistical analysis;

5.1.8. Audit & record keeping;

5.1.9. Compliance with legal & regulatory requirements;

5.1.10. Sharing of information with service providers and other third parties we engage to process such information on our behalf or who render services to us; and

5.1.11. Sharing of insurance and claims information with other insurers and industry bodies for legitimate reasons such as fraud prevention and claims validation.

5.2. TIH may collect, process, maintain, disclose or otherwise deal with your Personal Information, without your knowledge and consent, in the following circumstances:

5.2.1. *Required by law*

This most often relates to government tax reporting requirements or in terms of a court order or if required in terms of legislation or in accordance with the common law. When TIH is served with due legal process requiring the delivery of Personal Information, it has the legal duty to abide by that demand and will do so. TIH will, however, in all instances required by law, only disclose the Personal Information specifically requested.

5.2.2. Necessary to protect TIH's interest

This will not be used as a reason for disclosing Personal Information about a customer or a customer's accounts (including name and address) to anyone else for marketing purposes. However, basic procedures that protect TIH's interests sometimes lead to the disclosure of specific customer information. These instances are limited and the disclosure of information, restricted to what is reasonably required in the circumstances

5.2.3. In the public interest

TIH may be required to disclose Personal Information for matters of public interest (e.g. to assist in the prevention of crimes). Before complying with these requests, TIH will take every precaution to ensure the authorities involved have legitimate grounds to make such a request.

5.2.4. For statistical purposes

TIH may process and disclose Personal Information, for statistical purposes, that does not relate to you or any person specifically (i.e. de-identified information) as it deems appropriate.

- 5.3. Special personal information may be processed by TIH in the following circumstances:
 - 5.3.1. if you have consented to the processing or if the special personal information was made public by you;
 - 5.3.2. if the processing is required by law and if the processing is needed to create, use or protect a right or obligation in law;
 - 5.3.3. if the processing is for statistical or research purposes, subject to all legal conditions being met;
 - 5.3.4. 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.
- 5.4. The personal information of children will only be processed by TIH if any one-off the following applies:
 - 5.4.1. a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child;
 - 5.4.2. the processing is needed to create, use or protect a right or obligation in law, such as where the child is a beneficiary of an insurance policy or an insured person in terms of an insurance policy;
 - 5.4.3. the processing is for statistical or research purposes and all legal conditions are met.

6. HOW WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING

- 6.1. TIH may use your Personal Information to send you information on new services or products that may be of interest to you and from time to time will call, mail, email or SMS information to you about TIH, our products and services, or our partners and their products or services.
- 6.2. If you are not a TIH customer, or in any other instances where the law requires, TIH will only market to you by electronic communications with your consent.
- 6.3. If you do not wish to continue receiving this information, you may contact TIH and we will remove you from our mailing list.
- 6.4. We will only send you marketing communications if you have “opted in” to receiving such communications. You have the right to “opt out” of receiving marketing communications, whether by email or otherwise, at any time.

7. TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE BORDERS OF SOUTH AFRICA

- 7.1. In order to provide the products and services offered by TIH it may be required that we transfer your Personal Information to countries outside the borders of South Africa. TIH will only transfer your personal information to third parties outside the borders of South Africa in any of the following circumstances:
 - where your personal information will be adequately protected under the other country’s laws or an agreement with the third-party recipient;
 - where the transfer is necessary to enter into, or perform, under a contract with you or a contract with a third party that is in your interest;
 - where you have consented to the transfer; and/or
 - where it is not reasonably practical to obtain your consent, and the transfer is in your interest.
- 7.2. The Personal Information shared will be limited to the information required to fulfil the products and services, and the transfer will happen within the requirements of the law.
- 7.3. TIH will ensure that the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country, or if the other country’s laws provide better protection, the other country’s laws would be agreed to and applied.

8. DISCLOSURE OF INFORMATION

- 8.1. TIH will only share your personal information if any one or more of the following apply:

- if you have provided TIH with consent to share your personal information;
 - if it is necessary to conclude or perform under a contract, we have with you;
 - if it is required by law to do so; and/or
 - if it is necessary to protect or pursue a legitimate interest (yours, TIH's or a third party's)
- 8.2. TIH may, where required, share your personal information with the following third parties. These third parties are obliged to keep your personal information secure and confidential:
- TIH employees, as required by their employment conditions;
 - insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims, and other related purposes;
 - our service providers, agents and sub-contractors we use to offer and provide services to you;
 - payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions;
 - credit bureaus;
 - attorneys and other persons that assist with the enforcement of agreements;
 - regulatory authorities, industry ombudsmen and other persons the law requires us to share your personal information with;
 - law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
 - courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
 - persons to whom we have ceded our rights or delegated its obligations to under agreements, such as where a business is sold;
 - our partners with whom we have concluded business agreements.

9. INFORMATION SECURITY

- 9.1. TIH has deployed state of the art technology and implemented security measures to protect against the loss, misuse or alterations of the Information under our control, by unauthorised third parties. TIH is committed to providing secure services.
- 9.2. When TIH contracts with third parties, appropriate security, privacy and confidentiality obligations are imposed on them to ensure that personal information is kept secure.
- 9.3. TIH regularly tests the effectiveness of the security of our systems and responds to any threats that may be detected.

- 9.4. No data transmission over the Internet can be guaranteed to be 100% secure, and TIH does not warrant that your information will be secure but confirm that all reasonable security safeguards will always be in place.

10. ACCESS TO INFORMATION AND REQUEST TO CORRECT INFORMATION

10.1. Access to Information

10.1.1. You have the right to request a copy of the personal information TIH holds about you. This includes requests pertaining to:

- Confirmation that TIH holds your personal information;
- A copy of the record containing your personal information; and
- The identity of third parties who have and had access to your information.

10.1.2. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

10.1.3. Please note that any such access request may be subject to a payment of a legally allowable fee.

10.1.4. Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how you can give effect to the above listed rights. The PAIA Manual is located on the TIH websites.

10.2. Correction of Your Information

10.2.1. You have the right to ask us to update, correct or delete your personal information if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if we are no longer authorised to keep it.

10.2.2. You must inform us of your request in writing.

11. APPLICATIONS

We will only use the personal information obtained through the use of TIH Applications ('App'), for the purpose for which it was collected in order to provide the services or benefits and subject to the terms and conditions relating to the App.

The personal information obtained through the App may include:

- Location information;
- Driving behaviour;
- Preferences and usage information

12. COOKIES

- 12.1. Cookies are small pieces of data that allow the TIH web server to recognise you. Cookies are issued by a specific web server, stored in your web browser and can only be read by the issuing server. The type of information gathered is non-personal (such as the IP address of your computer, the date and time of your visit, the pages you browsed etc.).
- 12.2. Apart from merely establishing basic connectivity and communications, TIH may use this data to develop customized services that may be tailored to your individual interests and needs. We use cookies to save your email and username, so you don't have to re-enter it each time you visit our site. We may also use cookies to customise your preference settings for future return visits. This is also to facilitate speedy service to you and enhance your experience on the TIH websites. At no point in time will any of your Personal Information be stored in a cookie.
- 12.3. Should you choose to do so, it is possible (depending on the browser you are using), to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This may however cause certain features of the Website not to be accessible.

13. HOW LONG WE KEEP YOUR PERSONAL DATA

TIH will retain your personal data for as long as it is needed to fulfil the purposes for which it is collected, and this information is required for lawful purposes related to our functions and activities.

14. CHANGES TO THIS NOTICE

- 14.1. TIH reserves the right to amend or modify its Privacy Policy at its sole discretion, at any time, without any prior notice to the User, in response to meeting legislative requirements and dynamic business needs.
- 14.2. All amendments to the Privacy Policy will be posted on the TIH websites.
- 14.3. Unless otherwise stated, the current version shall supersede and replace all previous versions of this Policy.

15. HOW TO CONTACT US

- 15.1. If you have any queries about this Policy; you need further information about our privacy practices; wish to withdraw consent or correct your personal information, please contact the TIH Information Officer.
- 15.2. The TIH Information Officer can be contacted on:
Email: compliance@tihsa.co.za

16. INFORMATION REGULATOR

16.1. You have the right to complain to the Information Regulator.

16.2. The contact details are can be found at: <https://www.justice.gov.za/infoereg/>