

**PROTECTION OF PERSONAL INFORMATION ACT
PRIVACY POLICY FOR ZENITH FOR THE ACCOMPLISHED (PTY) LTD
2006/032693/07**

SCOPE:

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1. WHO WE ARE

Zenith for the Accomplished (Pty) Ltd in an underwriting manager doing business in the non-life insurance industry. We have binder agreements with The Hollard Company Limited, Infiniti Insurance Limited and Western National Insurance Company Limited. In this policy, “Zenith” or “we” refers to Zenith for the Accomplished and these insurers. We only operate in South Africa.

In terms of our binder agreements, we are obliged to integrate our insurance data with their system in accordance with the financial sector regulations.

2. PROTECTION OF PERSONAL INFORMATION

This policy explains how we obtain, use and disseminate the personal information of policyholders and the financial service providers who serve them. We enforce company policies to ensure that your personal information is collected and used properly, lawfully and transparently within the limitations and subject to the requirements set by law. We are committed to protecting the privacy of personal information.

3. KEY PRINCIPLES

The purpose of this policy is to explain how we deal with your personal information within lawful parameters. It is important to know that you are entitled to all rights which you may have in terms of the Protection of Personal Information Act (“POPI” or ‘the Act’).

For more information on what these rights involve, we refer you directly to the Act. Furthermore, the Information Regulator may from time to time issue codes of conduct for various industries. We will adhere to the applicable codes of conduct.

The key principles of this policy are:

WE VALUE YOUR RIGHTS to privacy and the protection of your personal information. We will always use personal information in a way that is fair and lawful.

YOU ARE ENTITLED TO clarity on how we use your personal information. We believe in transparency about what information we collect, what we do with it, with whom we share it and whom you should contact if you wish to know more or have any concerns.

TO WORK TOGETHER to promptly resolve any query or concern which you may have on how we use your information.

KEEP IMPROVING our business systems and processes and we will take all reasonable steps to protect your information from misuse and keep it secure.

WE WILL COMPLY with all applicable data protection laws and regulations in co-operation with data protection authorities.

4. DATA COLLECTION

We collect and process personal information to administer insurance policies and to deliver on the benefits provided. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need to provide you with the product which you have selected and services flowing therefrom at the standard which you are entitled to expect.

We collect personal information in accordance with our FSP Licence requirements and as required by the laws of South Africa. Therefore, we collect information directly from you or an intermediary duly appointed by you where you provide us with your personal details. We also process personal information voluntarily provided to our policyholders or mandated service providers.

Policyholders understand that they must disclose and declare all such information as a reasonable person would deem to influence the decision of an insurer to accept the risk as well as provide appropriate underwriting terms and premium rating for insuring the risk.

We also collect information about you from other sources as explained below:

- Our website:** usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.
- Training portal:** user information is collected for product accreditation and allocation of continuous professional development hours.
- Verification services:** to independently verify personal information collect from data subjects and reduce instances of fraud.

5. USE OF DATA

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship with you.
- For underwriting purposes.
- To assess and process claims.
- To conduct, premium collection, credit reference searches or verification.
- To confirm and verify your identity or to verify that you are an authorised user for security purposes.
- For operational purposes, and where applicable, credit scoring and assessment and credit management.
- For purposes of claim checks.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- For debt tracing or debt recovery.
- To conduct market or customer satisfaction research or for statistical analysis.
- For audit and record keeping purposes.
- For liaising with third-party-service-providers to offer those services to you which may be necessary in terms of the policy we have with you.
- In connection with legal proceedings.

6. DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you in terms of the policy.

We may share your personal information with, and obtain information about you from third parties, for credit reference and fraud prevention agencies, law enforcement agencies and other insurers for the purposes listed above.

7. INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Management of security and procedures include:

- Physical security
- Computer and network security
- 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

8. YOUR RIGHTS

Access to information:

You have the right to request a copy of the personal information which we have on record for you.

Correction of your information:

We would appreciate it if you would keep your personal information accurate. You have the right to ask us to update, correct or delete your personal information.

Contact your intermediary to instruct us accordingly and we will process to your instruction subject to the requirements in terms of the law. If you are not a policyholder, kindly contact us directly. We will take all reasonable steps to confirm your identity before making changes to the personal information we may hold about you.

9. CONTACT US

If you have questions about this policy or believe we have not adhered to it or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact your intermediary or contact our compliance department directly at 021 872 7065 or compliance@zenithinsure.co.za.

10. CHANGES TO THIS POLICY

This document might change as required from time to time. Please check this website periodically to inform yourself of any changes.
