



POPI STANDARD PRIVACY POLICY

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Shackleton Risk Management (Pty) Ltd and affiliates ("SRM") (also collectively referred to as "we", "our" and "us") want you to be familiar with our privacy policy and how we collect, use, process and disclose personal information. This Privacy Policy describes our practices in connection with the information that we collect through our activities.

Overview

This Privacy and Information Policy ("Privacy Policy") has been developed to acknowledge the importance of and assist in providing a framework for, the appropriate level of protection for consumer identification, collection, holding, using, disseminating, merging, collating, disclosing and protection of your personal information ("process" or "processing"). The policy represents SRM's commitment to compliance with its obligations under the Protection of Personal Information Act 4 of 2013 ("POPI").

We are committed to protecting the privacy and confidentiality of your personal information, and will take all reasonable steps to protect your personal information, including the use of technology. We cannot, however guarantee the security of any information you transmit to us electronically and you do so at your own risk. Only authorised Shackleton Risk Management (Pty) Ltd's employees and representatives will have access to your personal information. All our employees and service providers are held to stringent standards of privacy and security and are bound by confidentiality agreements.

The processing of personal information

We provide this policy in accordance with POPI, detailing the lawful approach we take in the collection of information and regarding the management, use and processing of all information collected from you and other legitimate sources and all subsequent dealings with our brokers / representatives, and administrative staff.

In the course of our business we process personal information in relation to our clients in terms of financial services provided to them, this includes personal identification particulars, financial advice, product information, your product selections, records such as proposals, renewals, letters of facility or broker mandate letters, details of historical insurance cover and current cover provided by an Insurer to us, for you.

The types of personal information collected and processed

We gather information about yourself primarily from you and in some instances from other organisations, such as other insurers when your consent has been provided.

Why we process personal information

We process personal information to communicate with you about renewals, industry news, and offers in relation to our services or products that we think may be of interest to you unless you requested us not to, receive any communication related to offers in relation to products and services promoted by us.

What laws authorise us to collect personal information?

We are authorised to collect your personal information, for a lawful purpose, by POPI, as well as for the purposes that are listed in this Privacy Policy. In order to access/collect/process your information, we act on your behalf as the “responsible party” requesting to access your personal information under South African legislation.

How we collect personal information

We collect personal information in South Africa from these possible legitimate sources:

- from you;
- from the documentation that we request and that you provide;
- from information about you that is publicly available, including court and tribunal reports and decisions.

Please note, depending on circumstances, we may choose not to collect information from all these sources.

How we hold personal information securely

In all circumstances the information is held by us on our secure systems or data base. We undertake to take all reasonable and necessary steps to secure the integrity and confidentiality of your personal information and protect your information from misuse, loss, interference, unauthorised access, modification, breach or unauthorised disclosure.

Electronic copies are held in a secure environment, with the application of appropriate passwords and other computer and software security techniques.

How we use your personal information provided

Once you have submitted your information and provided consent for us to use of your information, we are entitled to use your personal information as follows:

- To communicate with and identify you ;
- To check when was the last time you used our services, if at all;
- To inform you of services and/or products which we think you may be interested in (unless you have opted out);
- To receive confirmation that you have granted us authority to act as the “responsible party” if information is held by a third party;
- For business purposes, such as analysing and managing our business, market research, audits, developing new products, improving our services and products, gauging customer satisfaction and providing customer service (needs to use de-identified data for this purpose) need to make reference to 8 conditions of the act
- For any purpose permitted by law

What do we do with your personal information?

We undertake to only use your Personal Information for the purpose required to assist you or provide solutions to you.

We do not sell, trade, share or rent your personal information to any third party for marketing purposes.

We may, for an indefinite period, unless otherwise notified by you, use the information provided by you for internal marketing, research and profiling purposes.

Should you at any point in time wish to opt out from the use, collection and processing of your personal information, this can be done by informing us at info@srisk.co.za.

Parties we share your information with

- We ensure protection of your personal information, by only entering into agreements with third parties that have policies that comply with POPI. Compliance with POPIA ensures the personal information we have disclosed is used only for the specific lawful purpose we have requested on your behalf.
- We may disclose your personal information to third parties if we are under a duty to disclose or share such information in order to comply with any legal obligation or to protect the rights, property or safety of SRM, its clients and others.

What kinds of website visitor information we collect

SRM may collect personal information about you as you utilise our website. This is done through the use of 'cookies'.

Cookies are small text files consisting of encrypted information assigned to a computer's browser, which is given to your browser by our web server when you visit our website. This data is stored on your browser. The cookie is sent back to our web server each time you visit our website. Cookies are not computer programs and do not run on a computer like programs do. They cannot gather information or function on their own. They cannot collect any personal information about you or your machine and cannot gather data or information about what you do on the internet. Cookies merely enable us to provide a more valuable online experience to you. You can set up your internet browser to disable cookie technology.

Unless requested not to, we may aggregate and hold the information we collect to research and help us understand broad demographic trends, but before we use or hold such aggregated data we remove anything and everything that identifies you personally.

How you may complain about our failure to comply with POPIA

There are 2 ways you may complain:

- Verbally, or in writing, by contacting the Information Officer | Elsie Jansen | ElsieJ@srisk.co.za
- Any additional information or concerns can be found and raised with the Information Regulator, who can be contacted as shared below, but please feel free to contact me/us first to discuss any questions or concerns you may have:

Website: www.inforegulator.org.za

Tel: 010 023 5200

Toll Free: 0800 017 160

Email: enquiries@inforegulator.org.za

Address: Woodmead North Office Park, 54 Maxwell Dr, Woodmead, Johannesburg, 2191

There is no charge for lodging a complaint.



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