

PRIVACY STATEMENT

1. Introduction

Moneygurus and Atlehang Life (“the Company”, “we”, “our”, “us”) subscribe to the provisions of the Protection of Personal Information Act No 5 of 2013 (POPIA) and therefore respects the right to privacy and confidentiality of your Personal Information (as defined in the POPIA) and is committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and transparent. Under the provisions of the POPIA, we are required to explain to our suppliers why we collect information about you; how we intend to use that information; how we will safeguard it; how long we will keep it; how we will destroy it; and whether we will share your information with anyone else. Your Personal Information will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing and in accordance with this Privacy Statement.

2. What is Personal Information

Personal Information is defined by the POPIA as 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, location information, online identifier or other particular assignment to the person;
- (d) the 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;

A person to whom the Personal Information relates is called the Data Subject.

3. What type of Personal Information do we collect?

The personal information that is collected by Moneygurus and Atlehang Life from the Data Subject can include; Personal Details – name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, the current status of health, medical history and any existing conditions of each person insured.

Contact information – email address, phone number, physical and postal address.

Online information – for example, cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.

Financial information – banking details, information regarding your income, expenses, assets, liabilities, investments, retirement and other financial provisions in the context of providing financial advice and intermediary services.

Contractual information – details about the policies you hold and with whom you hold them.

3.1 How we process your Personal Information

Moneygurus and Atlehang Life will process your Personal Information lawfully and in a manner that does not infringe on the privacy of the data subject. Your Personal Information will only be processed for the purpose set out in paragraph 4 below and your Personal Information will only be processed if the data subject or a competent person if

the data subject is a child consents to the processing. Moneygurus and Atlehang Life will treat the information as private and confidential and will not share your Personal Information without your consent.

4. Why do we process your Personal Information?

Atlehang Life is a licensed micro-insurance company and an authorised financial services provider. In order to provide financial services and services that are required by clients, it has to process the Personal Information as mentioned in paragraph 3 above.

Section 1 of the POPIA defines Processing as 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
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

The Personal Information that you give to us will be used for the following purposes as permissible by the applicable laws and as it relates to the rendering of financial services to you-

- (d) to provide you with our financial products and services, and maintain our relationship with you;
- (e) to provide you with financial advice and intermediary services;
- (f) to conclude and administer your application, which may include underwriting;
- (g) to execute a transaction in accordance with your request;
- (h) to assess, check, and process claims;

(i) to meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;

(j) for reporting to regulatory authorities including applicable industry codes of conduct, in compliance with applicable laws, (including the Financial Sector Conduct Authority, Prudential Authority and Financial Intelligence Centre);

(k) to undertake credit reference searches and/or verification when establishing affordability;

(l) for the identification and prevention of unlawful activity, fraud, money laundering and loss, including as part of party due diligence required under applicable laws and in terms of our internal processes;

(m) to record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;

(n) for audit and record-keeping purposes;

(o) for purposes of proof and legal proceedings;

(p) to enhance your experience when interacting with Atlehang Life and to help us improve our financial services to you;

(q) to conduct market research and provide you with information about our products and services from time to time via email, telephone or other means (for example, invite you to events); and

(r) for any purpose related to and compatible with the above.

5. Special Personal Information

Moneygurus and Atlehang Life may process Personal Information falling into a Special Personal Information category as per section 26 of the POPIA, however, such processing is subject to the provisions of the POPIA. Special Personal Information includes information concerning-

(a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or

(b) the criminal behaviour of a data subject to the extent that such information relates to-

(i) the alleged commission by a data subject of any offence; or

(ii) any proceedings in respect of any offence allegedly committed by a data subject or the

disposal of such proceedings.

Atlehang Life will only process your Special Personal Information under the following circumstances-

(a) if you have consented to the processing thereto.

(b) if the processing is needed to create, use or protect a right or obligation in law.

(c) if the processing is for statistical or research purposes.

(d) if the special personal information was made public by you.

(e) if the processing is required by law.

(f) if racial information is processed and the processing is required to identify you.

6. How does Atlehang Life collect your Personal Information?

The collection of Personal Information takes the following form

6.1 Sales Stage – application form that you will complete either in full or partially at the sales stage whether in person or electronically.

6.2 Claims Stage – claim form that you will complete in person or electronically.

6.3 Third Party – applications made through our intermediaries who render financial services on our behalf.

6.4 Collection by Third Parties, Moneygurus and Atlehang Life uses certain social networking services such as Facebook, LinkedIn, and Twitter to communicate with the public and Moneygurus and Atlehang Life clients. When you communicate with Moneygurus and Atlehang Life through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies which are independent of Moneygurus and Atlehang Life's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

7. Sharing of Personal Information

To facilitate, administer and manage your insurance policy, Moneygurus and Atlehang Life may have to share your Personal Information with third parties that form part of the distribution channel within Moneygurus and Atlehang Life. The purpose for sharing your personal information will include-

(a) for delivery and/or administration of financial services;

(b) for purposes that are set out in paragraph 4 above;

(c) for reinsurance purposes;

(d) for reporting to law enforcement agencies, and regulatory authorities when required by law;

Where the third parties act as an "Operator" they carry out their tasks on our behalf and upon our instructions for the above-mentioned purposes. In this case, your Personal Information will only be disclosed to these parties to the extent necessary to provide the

required services and the third party will be obliged to use that Personal Information only for the purposes it was initially processed for. Third parties with whom Moneygurus and Atlehang Life shares your Personal Information will undergo a due diligence process, a safeguard measure to ensure they process any information disclosed to them in accordance with the contractual relationship we have with them and applicable law, including with respect to data confidentiality and security. Where appropriate, the third parties set out above have agreed to confidentiality restrictions and use any Personal Information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us.

8. Storage and Retention of Personal Information

Moneygurus and Atlehang Life endeavour to ensure that Personal Information is kept as current as possible, and that irrelevant or excessive data are deleted as soon as reasonably practicable. Moneygurus and Atlehang Life generally retain Personal Information for as long as it reasonably considers necessary for achieving the purposes set out above and as is permissible under applicable laws. We will, in any case, retain your Personal Information for as long as there are statutory retention obligations or potential legal claims that are not yet time barred. You may request us to delete your Personal Information, this will be carried out unless there is a statutory obligation that requires us to keep your information for a specific period. We will, however, destroy the record of your information beyond reconstruction when that period comes to an end. It is your responsibility to ensure that your data is complete, accurate and up to date.

9. Security of Personal Information

Moneygurus and Atlehang Life are committed to protecting the confidentiality and security of the Personal Information you share with us. We have implemented generally accepted standards of technology and operational security (e.g., encryption, breach notification plan, regular audits and inspections) in order to protect Personal Information from loss, unauthorised access, misuse, alteration or destruction. Only authorised

persons are provided access to Personal Information; such individuals have agreed to maintain the confidentiality of this information. Although we use appropriate security measures once we have received your Personal Information, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect Personal Information, but we cannot guarantee the security of data transmitted to or by us. Moneygurus and Atlehang Life will advise the Information Regulator (established in terms of section 39 of the POPIA) and you when there's been an actual or a threat to access and process the Personal Information that is in its possession by an unauthorised party.

10. Transfer of Personal Information

Outside the Republic of South Africa (RSA) Moneygurus and Atlehang Life can send Personal Information to another country to be processed and can process information received from countries outside the RSA. This includes countries that do not have laws that provide specific protection for Personal Information. Where we collect your Personal Information within the RSA, transfer outside the RSA will only be done if:

The recipient is subject to a law, binding corporate rules or a binding agreement which upholds principles for reasonable Processing of the information that is substantially similar to the conditions contained in POPIA and includes provisions that are substantially similar to those contained in POPIA relating to the further transfer of Personal Information from you to third parties who are in another country.

You have consented to the transfer of your Personal Information to that country

The transfer is necessary for the performance of a contract between you and Moneygurus/Atlehang Life, or the implementation of pre-contractual measures taken in response to your request or

The transfer is necessary for the conclusion or performance of a contract concluded in your interest between Moneygurus/Atlehang Life and a third party, or the transfer is for you and it is not reasonably practicable to obtain your consent to that transfer, and if it were reasonably practicable to obtain such consent, you would be likely to give it.

11. Your Rights as a Data Subject

With regard to your Personal Information, Section 5 of the POPIA gives you, the Data Subject the right to:

not have your Personal Information processed in an unlawful manner,

be notified that your Personal Information is being processed,

not have your Personal Information processed without your consent,

object to the Processing of your Personal Information,

be given the details of the principal party that is in possession of your Personal Information,

update your information as to when a change occurs,

have your Personal Information protected from access by unauthorised parties,

be notified when unauthorised parties have gained access to your Personal Information,

request the deletion, destruction of your Personal Information,

be given access to the record that has your Personal Information,

be advised of the period for which your Personal Information will be kept, and

have your Personal Information destroyed when the purpose for which it was collected is met.

12. Contact Us

Please contact us at the following contact details when you want to exercise a legal right in relation to your Personal Information or an inquiry if you have a question or complaint about the handling of your Personal Information.

You may also contact us using the following details:

Information Officer: Dr Lawrence Konyana

Atlehang Life

57 Western Service Road

Wendywood

Sandton

2090

Tel: 011 083 5013

Email: info@atlehanglife.co.za