

HOLISTIC RISK SERVICES (PTY) LTD PRIVACY POLICY

INTRODUCTION

At, Holistic Risk Services (Pty) Ltd, we prioritise the privacy, security and online safety of our customers' personal information. We are committed to safeguarding your personal information and ensuring its protection in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA), as amended.

This Privacy Policy outlines our practices regarding the collection, use, sharing and protection of your personal information. By using our services, you acknowledge and agree to the terms of this policy, including how we handle any privacy-related issues.

As our business evolves, we may update this Privacy Policy to reflect changes. If such changes directly impact you, we will make efforts to notify you, as it is crucial for us that you remain informed about how your personal information is managed. Please ensure that we have your current contact information to facilitate any necessary communication.

DEFINITIONS

"We", "us" and "our" refers to Holistic Risk Services (Pty) Ltd ("the FSP"), a private company with limited liability, as well as a licensed financial services provider (FSP) registered under the company laws of the Republic of South Africa, with registration number 2004/026273/07 and FSP number 28582.

"You" and "your" refers to you as the principle party of the business relationship/policy/financial services.

"Your personal information" refers to personal information about you, your spouse, your dependents and your beneficiaries (as may be relevant). It includes information about health, financial status, gender, age, contact numbers and addresses and/or any other information that may be required in the ordinary course of the FSP performing its duties.

"Process information" means the activities of collecting, recording, organizing, storing, updating, distributing and removing or deleting personal information.

"Competent person" means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child, for example a parent or legal guardian.

- ❖ When you engage with us, you trust us with personal information about yourself, your spouse, your dependents, your family and beneficiaries. You understand that when you include your spouse and/or dependents on your application, we will process their personal information for the activation of the policy/benefit and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Policy.
- ❖ You have the right to object to the processing of your personal information. It is voluntary to accept these terms and conditions. This means that if you do not accept the terms of this Privacy Policy, we cannot process any of your personal information. The acceptance of these terms and

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An Authorised Financial Service Provider | FSP 28582

Director: Andrew Penney

conditions and the permission given to process your personal information will continue after your death, if there is a surviving spouse, or may cease, in the event that someone is appointed to manage your affairs should there be no beneficiaries who may require the continuance of our support in our advisory and/or intermediary capacity.

- ❖ We commit to keeping your personal information confidential. You may have given us this information yourself or we may have collected it from other sources e.g. product supplier. If you share your personal information with any third parties beyond our channels, we will not be responsible for any loss or harm suffered by you, your spouse, your dependents or your beneficiaries.
- ❖ You provide us the necessary assurance that when you give us personal information about your spouse, your dependents, or your beneficiaries, you have received their permission to share their personal information with us for the purposes set out in this Privacy Policy or any other related purposes.
- ❖ You understand that when you include your spouse and/or dependents in any interaction with the FSP, we will process their personal information in the ordinary course of performing our duties for you and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Policy.
- ❖ If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give consent for them.
- ❖ By appointing the FSP as your Financial Services Advisory or Intermediary, you confirm that you give us consent to process your personal information and that we may:
 - Share with our carefully selected range of services and/or product suppliers your benefits/policy information, including your personal information, necessary to ensure the efficient administration of the benefits/policy and to ensure that we comply with all relevant legislation; and
 - Share your ordinary personal information and, as may be necessary, special personal information for purposes of performing our duties to you in the ordinary course of the business relationship.
- ❖ You agree that we may process your personal information for the following purposes:
 - Administration, maintenance and advisory purposes to ensure your best interests (including those of your dependents or beneficiaries) during the course of the business relationship;
 - Enabling any connected entity (Product or service supplier) to the FSP and any third-party provider or other party(ies) or its representative approved by the FSP to advise you of, or offer to you, any enhanced benefits or new products that become available from time to time which you may become entitled to or qualify for; and/or

- Providing relevant information, including your personal information, to a contracted third party who requires such information to render a service to you in relation to your benefits/ policy(ies), provided that such contracted third party agrees to keep the information confidential.
- ❖ Further to the above, if a third party asks us for any of your personal information, we will share it with them only if:
 - You have already given your consent for the disclosure of this information to that third party;
 - We have a legal or contractual duty to give the information to that third party; or
 - For any of the purposes set out below.
- ❖ You confirm that we may share your personal information within the FSP for the purposes of administration, fraud prevention, and where necessary, to provide additional services, benefits or advice (not limiting to) to help you in your consumer capacity of financial products and/or related services.
- ❖ You consent and agree that we may process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists;
 - You also consent to us communicating such personal information to all relevant Regulatory Bodies as well as to other entities, as may be necessary and obligatory, if you are matched to one of these sanctions' lists; and
 - You understand that we may and shall terminate this agreement with immediate effect if you are found to be on a sanctions list, without notice.
- ❖ You also confirm that we may share and combine all your personal information for any one or more of the following purposes:
 - Market, statistical and research; and
 - To tailor our advisory and intermediary services to meet your needs.
- ❖ You agree that your personal information may be shared with third parties such as product and services suppliers contracted to the FSP and/or used for research and statistical purposes within the Company or with parties outside of the Company who may be responsible for these activities of the organisation (where applicable). We assure you that your personal information will only be shared, if it is in your best interest and where these parties keep your information confidential. No personal information will be made available to a third party unless that third party has agreed to abide by strict confidentiality protocols that we require.
- ❖ If we want to share your personal information for any other reason, we will do so only with your permission and explicit consent.

- ❖ We have a duty to take all reasonable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal information from you directly, and update such on at least an annual basis. If necessary, where we are unable to do so, we will attempt to make use of verifiable independent third-party data sources.
- ❖ We have the right to communicate with you electronically about any changes on your benefits / policy(ies), including your costs or changes and improvements to the benefits/policy(ies) you have chosen.
- ❖ We have a duty to keep you updated about any offers and new products or updates to existing products in the ordinary course of our business relationship with you and as such will make information available to you from time to time. Any entity with which the FSP partners and/or contracted third-party service or product providers/supplier may communicate with you about these.
- ❖ Please let us know if you do not wish to receive any direct telephone marketing from the FSP.
- ❖ You may opt out of marketing of any additional services and or products by notifying the FSP directly. We will store your personal information for the purpose to action this request and action it as soon as reasonably possible.
- ❖ You have the right to know what personal information we hold about you. If you wish to receive a copy, please complete an 'Access Request Form' and specify the information you would like a copy of. This form is part of the FSP's PAIA Manual to Accessing Information and can be found on the FSP's website at www.hrsinsurance.co.za under "quick links" at the bottom of the "Home" page or on request from the FSP by sending a formal written request to info@hrsinsurance.co.za. We will take all reasonable steps to confirm your identity before providing details of your personal information. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
- ❖ You have the right to ask us to update, correct or delete your personal information. Where we cannot delete your personal information, we will take all steps to make it anonymous. You agree that we may keep your personal information until you ask us to delete or destroy it, unless the law requires us to keep it for a defined period of time, after which it may be deleted.
- ❖ We are required to collect and keep personal information in terms of the following laws:
 - The Electronic Communications and Transactions Act (ECT);
 - The Financial Intelligence Centre Act (FICA);
 - The Financial Advisory and Intermediary Services Act (FAIS);
 - The Consumer Protection Act (CPA); and
 - Long Term Insurance Act (LTIA); amongst others.
- ❖ You agree that we may transfer your personal information outside South Africa (if applicable):

- If you give us an email address that is hosted outside South Africa; or
 - To administer certain services, for example, cloud services; or
 - Where required to administer any offshore product or financial services as may be determined in the course of the business relationship and your specific portfolio. We will ensure that any country, company or person that we pass (if necessary) your personal information to agrees to treat your information with the same level of protection as we are obliged to.
- ❖ If we become involved in a proposed or actual sale, merger, acquisition of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Policy will continue to apply.
 - ❖ We may change this Privacy Policy at any time. The most updated version will always be available on www.hrsinsurance.co.za or on request, as may be necessary at any time.
 - ❖ If you believe that we have used your personal information contrary to this Privacy Policy, you must first attempt to resolve any concerns directly with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator, under POPIA.

Information Officer: Holistic Risk Services (Pty) Ltd	Information Regulatory
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