



Clientèle

CLIENTÈLE GROUP PRIVACY POLICY

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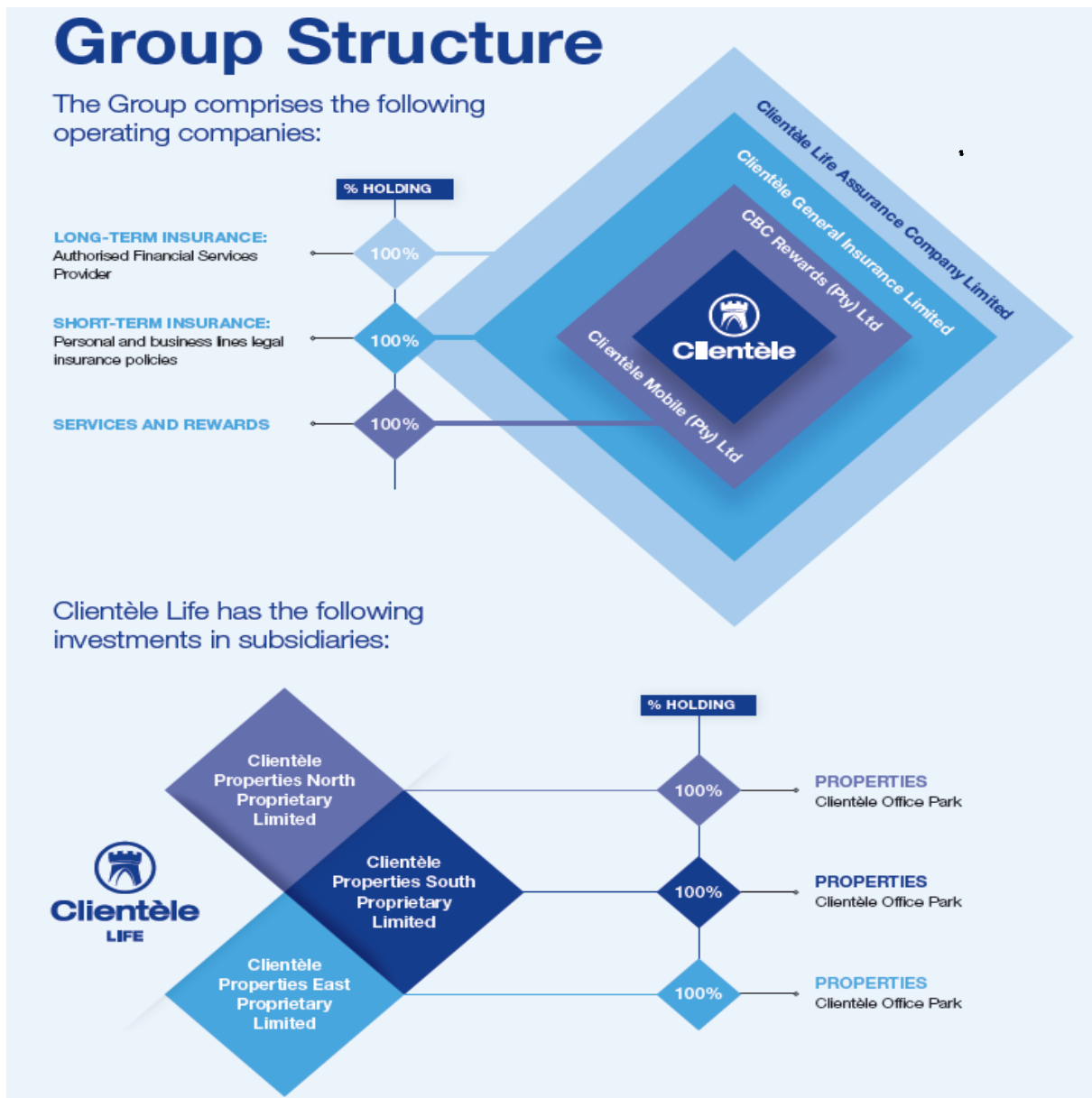
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1. Introduction

The Clientèle Group (Clientèle) recognises its responsibility to protect the Personal Information that it collects and to minimize the possible compromise to such information. As such, (Clientèle) respects the right to privacy and confidentiality of our potential and existing clients' Personal Information. Furthermore, Clientèle urges all employees, customers, prospective customers, third parties, business partners, visitors and any other interested parties to ensure that they have read this Privacy Policy that applies to all users of its various platforms, including the Clientele website, the Clientele Mobisite and the Clientele Mobile Application which will collectively be referred to herein as "our platforms".

All references to 'our', 'us', 'we' or 'company' within this policy are deemed to refer to Clientèle, its subsidiaries, affiliates, parent companies and any of their respective associated companies and related businesses ("Clientèle Group" or "Group") as set out in the Group structure below:



About Our Service

The Clientèle is a diversified financial services group, listed on the Johannesburg Stock Exchange and is one of South Africa's leading direct distributors of financial service products. Our services include financial and non-financial services as per the group structure including long and short term insurance. When you submit your Personal Information to us, you agree that we may process your Personal Information on the basis described in our terms and conditions and this Privacy Policy (hereinafter referred to as "Policy").

By submitting any Personal Information to Clientèle, you provide consent to the processing of Personal Information and you acknowledge that you understand and agree to be bound by this Policy. Furthermore you agree that Clientèle, may collect, process, transfer, use, and disclose your Personal Information as described in this Policy. Further, by accessing any part of Clientèle's services, you are agreeing to the terms and conditions of our terms of service (the "terms of service"). If you do not consent to the provision of this notice, or parts of the notice, Clientèle may not be able to provide its products and services to you.

This Policy applies to all prospective, present and past Clientèle stakeholders, including, but not limited to, the following:

- Visitors of our website available at: <https://www.Clientèle.co.za> ("our website")
- Users of the Clientèle mobile application ("our App")
- Employees (including permanent, temporary or contract employees)
- Customers/ Prospective Customers
- Third parties & Affiliates
- Business partners
- Any other interested parties
- All of the above collectively referred to as "you"

This Policy complies with the principles contained in the Electronic Communications and Transaction Act 25 of 2002 (ECT), for electronically collecting Personal Information and the right to notify data subjects how we handle Personal Information given to Clientèle as per the Protection of Personal Information Act 4 of 2013 (POPIA).

2. Collection of Personal Information

This section outlines the various channels and types of information that may be collected about you:

- a. Should you require additional information related to our services on our website we may require you to provide us with personally identifiable information which includes, but is not limited to, the following:
 - Name
 - Surname
 - Contact details
 - Email address
 - Identity number

- b. In addition, based on the nature and reason for your engagement with Clientèle, the following personally identifiable information may be collected about yourself:
 - Personal Information which may include name, surname and Identity and/or passport number, banking details (inclusion of account details and card details).
 - Contact details which may include email addresses, and mobile numbers.
 - Other relevant Information in order to conduct business with you.
 - Indications that you have opted-in to receive communication.
 - Information related to your past/current employment, tax number and financial information.
 - Any information which you are asked for when registering to use or when enquiring about our products and services, Including, but not limited to, long term and short term insurance, rewards programmes and mobile services. These services may change from time to time.
 - A list of the products, services you indicate an interest in or have made use of.
 - Date of Birth
 - Income
 - Details of family members (if cover is desired for family members)
 - Limited Medical History (for some applicable products)

- c. We may collect Personal Information from other sources which may include and is not limited to the following:
 - Trusted Third Parties or Affiliates
 - SMS
 - Social media platforms which include Facebook, Twitter & Instagram
 - Email
 - Telemarketing (Cold-calling)
 - Telephone calls
 - Our Mobile App
 - WhatsApp
 - Automated voice calling (AVM)

You supply your Personal Information to us voluntarily and acknowledge that failure to provide us with the required Personal Information may result in you not being able to access the service provided.

2.1. Consent

By submitting your details in any of the manners as listed in paragraph 2 (c) above, you accept the terms and conditions of this Policy and explicitly consent to the collection, use and disclosure of your Personal Information in the manner described below. With regards to external sources, you agree to allow us to collect further information about you from external sources, including our affiliates for the sole purpose of ensuring that our aggregated information is accurate and up to date.

2.2. Purpose for Collection and Use of your Personal Information

- a. We shall only collect, collate, process and store ('use') your Personal Information in line with the provisions of this Policy.
- b. We use your Personal Information to provide you with a better service offering and in particular for the following reasons:
 - Sending you marketing communications regarding our insurance policies and/or value-adding services, benefits or offerings.
 - Providing you with information about products and/or services you have requested and notifying you about important changes or developments to these products and/or services.
 - Providing you with information that you may have requested.
 - Providing you with information related to specific claims, based on your request or when necessary.
 - Addressing any complaints that you may have submitted.
 - Following up as part of our customer care procedures.
 - Competitions and other promotions.
 - Making our service easier for you to use and providing you with access to certain parts of the service and to contact you for market research purposes.

2.3. Direct Marketing Activities

- a. You agree that we may send you marketing communications *via* Telephone calls, Automatic Voice Mail (AVM), E-mail, SMS or any other messaging or social media platform(s) (e.g. WhatsApp, Facebook, Twitter etc.) regarding any of our insurance policies and/or value-adding services, benefits or offerings.
- b. You may "Opt-Out" of receiving direct marketing communications from us at any time by clicking on the following link <https://clientele.co.za/clientele-communications/> and following the prescribed procedure.

2.4. Cookies

- a. We use cookies on our web-based services. Cookies are files that store information on your hard drive or browser. This allows us to recognize that you have visited our website before and will make it easier for you to maintain your preferences on the website, and by seeing how you use the website, we can tailor some around your preferences and measure usability of the website. You can, should you choose, disable the cookies from your browser and delete all cookies currently stored on your computer. You can delete cookies at any time or you can set your browser to reject or disable cookies. If you do disable cookies some functions on the website may not work correctly. *Example of the type of information that is collected includes:*
- The IP address from which you access the website.
 - The type of browser and operating system used to access the website.
 - The date and time of your access to the website.
 - The pages you visit on our website.
 - The internet address of the website from which you accessed the website.
- b. In addition to the Personal Information you submit, when visiting our website, we may collect usage information which may include your geographical location and information about the timing, frequency and pattern of your service use. This information may be processed for the purposes of analysing the use of the website and improving usability.
- c. We collect aggregated site-visitation statistics using cookies. We do not track individuals' use of the site. When someone visits the site, a cookie is placed on the individual's machine (if the individuals accept cookies).

3. Storage and Disposal

- a. We may keep your Personal Information in either electronic or hard copy form. In both cases, we take reasonable and appropriate security measures to ensure that the Personal Information is protected from misuse and loss and from unauthorised access, modification or disclosure.
- b. You agree to us retaining your Personal Information after we have finished processing it for its original purpose and you agree that we may, without having to first notify you, further process your Personal Information in future for all purposes mentioned in this Policy.
- c. We may use Third Party service providers to help us deliver certain services, and in some instances Personal Information can be stored outside of South Africa. We may permit these service providers to process our business information and/or your Personal Information however, we do not permit these service providers to process any Personal Information outside of a contract, and these service providers may collect

Personal Information on our behalf. Our Third Party service providers are required to be fully compliant with this Policy.

- d. You may object at any time to us processing your Personal Information by way of contacting our Customer Services Department via telephone or email, or utilising the “Opt-Out” option on our website, whereupon we will cease to process your Personal Information.

4. Information Sharing and Disclosure

- a. We do not sell Personal Information and therefore we will not disclose your Personal Information to anyone except as mentioned in this Policy.
- b. Clientèle will only share your Personal Information:
 - With Third Parties such as banks and credit card processors, to provide you with the services requested.
 - Where it is necessary to protect the rights, property, or safety of Clientèle users, or others, which may include the exchange of information with other organizations for aspects related to fraud and/or risk reduction.
 - With regulators as law or regulatory audits require.
 - With law enforcement as subpoena or court order requires; or
 - With other Third Parties as applicable law requires:
- c. All service providers are bound by contract to maintain the confidentiality and security of your Personal Information and are restricted in their use thereof as per this Policy.

5. Security and Confidentiality

We understand the value of your Personal Information and therefore will take all reasonable steps to protect your Personal Information from loss, misuse or unauthorised alteration, access or disclosure, by the following:

- a. Your Personal Information is stored in databases that are protected by safeguards and firewalls to ensure the privacy and confidentiality of your information.
- b. We use SSL Web Server Certificates to offer secure communications. At each point where information is captured the secure padlock symbol will appear in your browser showing that all communication is encrypted.
- c. We constantly monitor the latest internet developments to ensure our systems evolve as required. We also test our systems regularly to ensure that our security mechanisms are up to date.
- d. Clientèle does not make any warranties or representations that content shall be entirely safe or secure.

Please note that the security of Personal Information that is transmitted through the internet or via a mobile device can never be guaranteed. While we have taken all reasonable security steps, we will not be held responsible for any interception/loss of Personal Information or interruption of any

communications through the internet.

6. Data Subject rights

As a Data Subject you have the following rights:

- a. That the Personal information we hold about you is accurate.
- b. to request access to your Personal Information that Clientèle holds about you
- c. to request rectification of your Personal Information that Clientèle holds about you by sending an email to services@clientele.co.za
- d. Request deletion or return, as permitted by law, of your Personal Information that Clientèle holds about you.
- e. Request restriction of processing of your Personal Information.
- f. Object to processing of your Personal Information as permitted by law.

7. Third Party Links

The website may contain links to third party/affiliate websites, or you may be directed to Clientèle through a third-party website. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them.

We are not responsible for any representations, information, warranties or content on any website of any third party or our affiliates. We do not exercise control over third parties' and our affiliates privacy policies, and you should refer to the policy of any such third party or affiliates to see how they protect your privacy.

8. Changes to Policy

We reserve the right to update (including without limitation, by the addition of new terms and conditions) this Policy from time to time with or without notice or justification for the following reasons:

- a. For compliance with any changes to any legal or regulatory requirements.
- b. In order to ensure that this Policy is clearer to you.
- c. To update any error that may be discovered from time to time.

You therefore agree to review this Policy whenever you visit the website for any such change.

9. Information Regulator

If you are not satisfied with Clientèle processing your processes related to your Personal Information handling, you have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Telephone: 012 406 4818

Fax: 086 500 3351

Email: inforeq@justice.gov.za

10. Contact us at:

Clientèle Life Assurance Company Limited
Clientèle Office Park
Corner Rivonia and Alon Roads
Morningside
2196
Contact number: 011 320 3000
Group Information Officer: Malcolm Mac Donald

11. Sign Off

 Clientèle Group Managing Director
 Date:

 Chairman of the Board
 Date:

 Clientèle Group Information Officer
 Date:

Document Information and History

Document Information	
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