

Privacy Policy

For

'the Company' as detailed in the footer.



Contents

Privacy Policy 1

Introduction.....3

What Information Do We Collect3

How We Collect Information4

Collection Of Information By Third Parties.....4

Why We Process Your Personal Information.....5

Sharing Your Information.....6

Transfer Across Borders6

Security & Storage Of Information.....6

Right Of Access To Information.....7

Information Officer and Deputy Information Officer.....7

Correction Of Your Information.....8

Objection To Processing Of Your Information8

Marketing8

Clickstream Data.....9

Cookies9

Updates..... 10

Version Control..... 11



Introduction

This Privacy Notice describes how the Company (“we”, “us”, “our”) collects, uses, discloses, retains and protects your personal information, in full compliance with the Protection of Personal Information Act (POPIA) and other relevant laws. We ensure that personal information is only collected for purposes related to our products and services.

POPIA defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person”. This includes, but is not limited to, your name, sex, gender, address, contact details, identity number, and medical or health information.

The Privacy Notice applies to any website, application, form, document, product, or service that mentions it.

What Information Do We Collect

Please note that we are handling your personal information as part of our role as an intermediary and administrator, the personal information we may process includes the following:

- Information about you – for example, your name, identity number, age, gender, date of birth, nationality, and occupation. If you make a claim, we may also collect personal information from you about the claim and any relevant third parties. Note that we will use that information strictly in accordance with applicable laws and for insurance purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).
- Contact information – for example, we may receive your email, address, phone number 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 – we may process information related to payments you make or receive in the context of an insurance policy or claim.
- Vehicle Tracking and Telemetry Data – we may access and process vehicle tracking and telematics data from your tracking company throughout the policy period.

In certain instances, we may need consent to collect, process and store your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of your personal information where consent is not required.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.



How We Collect Information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you when you complete a product or service application form (electronically, telephonically, or by way of a hard copy).
- Indirectly from you by way of our website, mobile applications, or social media channels, which may include the collection of metadata and telemetry data. When we collect your information indirectly, we do so only for legitimate business purposes.
- Where relevant, from third-party sources, such as, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies. Your information may be verified against legal sources or databases.
- We will also collect your information where you partially complete or abandon an application on our website or online forms, we may contact you to remind you to complete it. Given that we already consider you a customer at this stage, we may use this information to contact you to remind you to complete outstanding information.

Where we require personal information to provide you with our products and services, your failure to provide us with the necessary information, will result in us being unable to provide you with our products and services. Where such services include financial advice, the appropriateness of the advice may be compromised if you do not provide complete and accurate information. You are responsible for informing us if your information changes.

Collection Of Information By Third Parties

Owners or information system administrators of third-party websites that have links to our website, such as GullWing Telemetry Solutions (Pty) Ltd, may collect personal information about you when you use these links. We do not control the collection or use of personal information by third parties, and this privacy statement does not apply to third parties.

We do not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.

We also use certain social networking services such as Facebook, WhatsApp, Instagram and Twitter to communicate with the public and our clients. When you communicate with us 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 our privacy policies and practices.



Why We Process Your Personal Information

We may collect, use, and process your personal information, to the extent permissible under applicable laws, for the following purposes:

- **Provision of Products and Services**
 - To provide you with financial products, services, and advice, and to maintain and enhance our relationship with you.
 - To conclude, administer, and execute your applications, policies, claims, and transactions.
 - To assess, underwrite, and manage risks fairly, including calculating and adjusting premiums.
- **Compliance with Legal and Regulatory Obligations**
 - To comply with legislative, regulatory, and compliance requirements, including codes of conduct, directives, and reporting obligations.
 - To meet the requirements of regulators such as the Financial Sector Conduct Authority and Prudential Authority.
- **Fraud and Crime Prevention**
 - To detect, prevent, and report theft, fraud, money laundering, and other unlawful activities.
 - To conduct due diligence and ensure the security of our systems and digital channels.
- **Identity Verification, Accuracy and Administration**
 - To verify your identity, check the accuracy of your information, and maintain the security of our systems.
 - To assess, process, and evaluate claims, enforce policies, and ensure fair outcomes.
- **Communication and Customer Interaction**
 - To communicate with you, carry out your instructions and requests, and enhance your experience when interacting with us.
 - To conduct market research and provide you with information about our products and services.
 - To process your marketing preferences, including honouring requests to unsubscribe from direct marketing communications.
- **Risk Management and Strategic Initiatives**
 - To perform risk analysis and manage risks to you or our business.
 - To execute strategic initiatives and improve our offerings.
- **Audit, Record-Keeping, and Legal Proceedings**
 - For audit, record-keeping, statistical analysis, and research purposes.
 - For purposes of proof, legal proceedings, and compliance with legal obligations.
- **Vehicle Tracking and Telematics Data**
 - To access and process vehicle tracking and telematics data, including location, speed, driving behaviour, audio, video, and photos, for purposes such as:
 - a) Assessing and managing risks.
 - b) Calculating and adjusting premiums.
 - c) Detecting and preventing fraud.
 - d) Evaluating claims and enforcing policies.
 - e) Any other reasonable purpose related to managing your policy.
- All data collection and processing will comply with data protection and privacy laws, with reasonable steps taken to ensure the security and confidentiality of the data.



- **Legitimate Interests**
 - To protect your legitimate interests, as well as those of Prime, its partners, and third parties, in accordance with applicable laws.
- **General Purposes**
 - For any purpose related to and compatible with the above.

We only use your personal information for the purposes for which it was collected. Any further use of your information will always be compatible with the original purpose and lawful under POPIA.

Sharing Your Information

We will only share your personal information with third parties if there is a legitimate reason to do so. Amongst others, we may disclose the personal information you provide to us to the following entities:

- **Third-Party Service Providers and Group Entities:** Involved in the delivery and/or administration of your policy benefits and rewards (including both financial products and services and non-financial services products).
- **Other Third Parties:** Related to the purposes set out under the previous section (How we use your information).
- **Insurers, Public Bodies, and Law Enforcement:** For fraud detection and prevention, either directly or through shared databases.
- **Other Insurers:** For previous insurer checks, including cancellation and claims history.

Your personal information will only be used for the purpose it was requested and to help us and our partners meet our obligations or legal requirements. By law, your insurer may share information to prevent fraud and ensure fair underwriting of your policy.

We will not sell, rent, or trade your personal information to any third party. We will disclose information when lawfully required to do so:

- To comply with any relevant legislation.
- To comply with any legal process; and
- By any regulatory authority (for example, the Financial Sector Conduct Authority or Prudential Authority).

Transfer Across Borders

Some of the persons to whom we disclose your personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, we may send your personal information to service providers outside of the RSA for storage or processing on the Insurer's behalf. However, we will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

Security & Storage Of Information

We intend to protect the integrity and confidentiality of your personal information. We have implemented appropriate technical and organisational information security measures to keep your information secure, accurate, current, and



complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Right Of Access To Information

The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. This right can be exercised in accordance with our PAIA manual.

You have the right to:

- i. Access the information we have about you by contacting us at:

E-mail: compliance@prime.co.za

Telephone: 011 745 7800

Or, contacting the Insurer at:

Santam Structured Insurance Limited

E-mail: ssi.compliance@santam.co.za

Telephone: 0860 762 745

- ii. Ask us to correct or delete any information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or no longer authorised to be kept.
- iii. Object on reasonable grounds to the processing of your information. You may not object if you have given consent or if it is required by law. You must inform us of your objection using the contact details provided above.
- iv. Withdraw your consent allowing us to process your information; but we will continue to process your information if the law allows us.
- v. File a complaint with us or the Information Regulator, about an alleged contravention of the protection of your information.

Information Officer and Deputy Information Officer

The Information Officer must make sure the Company follows POPIA and PAIA laws. This includes:

- i. Staying up to date with POPIA and PAIA requirements.
- ii. Understanding how the Company uses personal information.
- iii. Making sure personal information is handled legally.
- iv. Managing requests for personal or company information.
- v. Working with the Information Regulator when required.



The Information Officer must also ensure that:

- i. A POPIA compliance system is in place and working properly.
- ii. Privacy impact assessments are done when needed.
- iii. The PAIA manual is created, updated, and available when required by law.
- iv. Systems exist to handle information and data requests properly.
- v. Staff are trained on POPIA, PAIA, and privacy rules.
- vi. Copies of the PAIA manual can be given out when requested.

The Information Officer can assign duties to the Deputy Information Officer.

The Deputy Information Officer helps with:

- i. Handling information and privacy requests.
- ii. Supporting compliance tasks.
- iii. Getting records from different departments.
- iv. Helping monitor compliance across the Company.

The Deputy Information Officer may:

- i. Speak to departments to get information needed for compliance.
- ii. Help process POPIA and PAIA requests.
- iii. Support reporting and compliance monitoring.
- iv. Escalate problems to the Information Officer when needed.

Correction Of Your Information

In accordance with POPIA, you have a right to correct any of your personal information held by us. If you would like to engage with us regarding the updating of your personal information, please contact our HUB on 011 745 7800 or at info@prime.co.za.

Objection To Processing Of Your Information

In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

Marketing

Where you provide your personal information to the us in the context of a sale of one of our products or services, you may agree to us sending you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from us at any time by contacting us at 011 745 7800.

Where you choose to exercise your right to opt out of direct marketing, please allow up to 21 days for us to effect that change.



Clickstream Data

We may collect anonymous information from visitors to our websites. In the process, we ensure the information cannot be used to identify you. This information is sometimes known as "clickstream data". We or our analytics vendors may use this data to analyse trends and statistics and to provide better customer service.

The information, referred to as traffic data, which may be collected includes:

- Your IP address;
- The search terms you have used;
- The pages accessed on the website and the links you've clicked on;
- The date and time you visited the website;
- The referring website (if any) through which you clicked through to our website; and
- The type of website browser you use.

As mentioned, the traffic data is aggregated and not personally identifiable and our website analysis will also respect any 'do not track' setting you might have on your web browser.

Cookies

A cookie is a small text file that is downloaded onto 'terminal equipment' (for example, a computer or smartphone) when you access a website. It allows the website to recognise your device and store some information about your preferences or past actions.

- *What cookies do we use?*

Some cookies which we use are essential to the functioning of our website. Some cookies help us with the performance and design of our website. This allows us to measure how many times a page has been visited, whether a page has been visited on the website through an advertisement or by other means.

Other cookies help us to remember your settings which you may have selected or assist with other functionality when you browse and use our website. This helps us to remember what you have selected, so on your return visit – we remember your preferences.

In addition, we also use cookies on certain pages of our website to communicate with third-party data suppliers to extrapolate your digital behaviour. This helps us to understand and target more relevant advertising in the future. The information we receive is all aggregate and anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle.

- *How do I disable cookies?*

If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the website. For example, you will not be able to benefit from automatic log-on and other personalisation features.



Updates

This privacy statement was last updated on 18 October 2024. A notice will be posted on our website home page whenever the Privacy Notice is materially changed.

Please check the website regularly to ensure that you are aware of the latest version of this Privacy Notice.

- **Particulars of the Company**

Address: Building 6, Bryanston Gate Office Park
170 Curzon Road, Bryanston.

Complaint's email: complaints@prime.co.za

General enquiries email: info@prime.co.za

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

- **The Information Regulator (South Africa)**

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

Complaint's email: POPIAComplaints@info regulator.org.za
PAIAComplaints@info regulator.org.za

General enquiries email: enquiries@info regulator.org.za



Version Control

Version	Revision Date	Revision Description	Name
1.	October 2023	Revision	Samantha Lubile
2.	May 2024	Revision	Lesley Borchardt
3.	January 2025	Revision	Chanelle Tshimpuki
4.	January 2026	Revision	Lesego Matlhoko
5.	May 2026	Revision & Addition of IO & Deputy IO for PASC	Lesego Matlhoko

