



1Life Privacy Policy

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Definitions

Clientèle Limited (Reg. 2007/023806/06), a public company incorporated in South Africa, **is a licensed controlling company of the Clientèle Limited Insurance Group (“Clientèle Group”)**, including all wholly owned subsidiaries.

1Life Insurance Limited (Reg. 2005/027193/06), (herein after referred to as 1Life), is a public company incorporated in South Africa, a licensed life insurer and authorised financial services and a wholly owned subsidiary of the Clientèle Group.

Personal Information (PI)

Personal information refers to information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person. This includes information such as:

- Race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth
- Education or medical, financial, criminal, or employment history
- Identifying numbers, symbols, email addresses, physical addresses, telephone numbers, location information, online identifiers, or other particular assignments
- Biometric information
- Personal opinions, views, or preferences
- Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature
- Views or opinions of another individual about the person

Protection of Personal Information Act (POPIA)

POPIA is an act that regulates the collection, storage, and use of personal information.

Data Subject

An individual or entity whose Personal Information is being collected, stored, and processed. In this context, Data Subjects include:

- Customers or policyholders
- Prospective customers or policyholders
- Visitors to the website or mobile app
- Users of the Group's products or services

Direct Marketing

Communication with Data Subjects to promote products or services, which can be done through various channels, including:

- Email
- SMS
- Telephone calls
- Social media

Opt-Out

The option to stop receiving direct marketing communications, which can be exercised through:

- Unsubscribing from emails or SMS
- Contacting Customer Services

Third Party Service Providers

Entities contracted by the Group to:

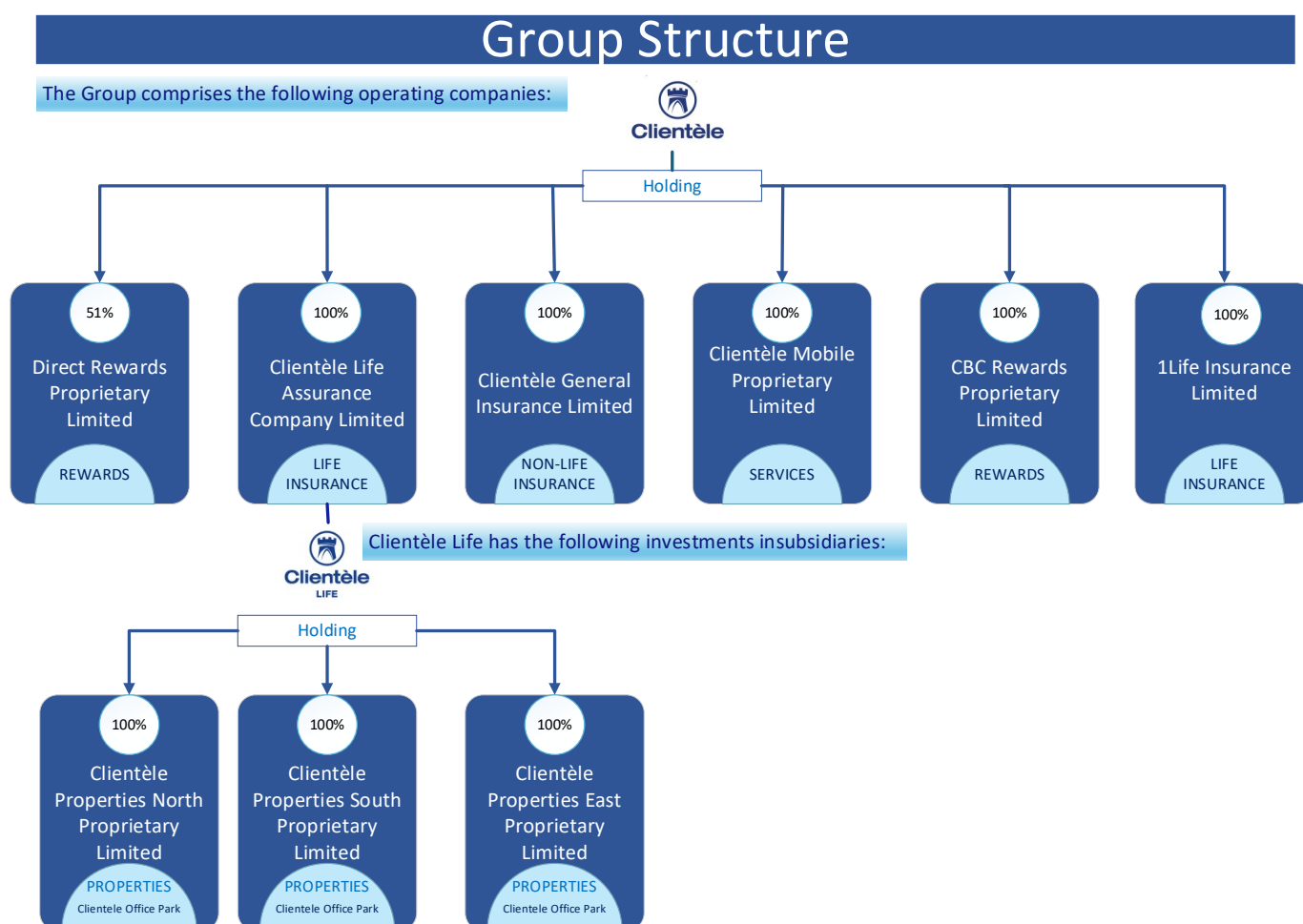
- Provide services (e.g., data storage, marketing)
- Process Personal Information on behalf of the Group

1. Introduction

All terms capitalised in this Privacy Policy yet not specifically defined shall bear such meanings as ascribed thereto in terms of the Protection of Personal Information Act, 2013 ("POPIA").

The Clientèle Group recognises its responsibility to protect the Personal Information that it collects from or about Data Subjects and to minimise any possible compromise to such Personal Information and accordingly confirms its commitment to respecting all Data Subjects' right to the privacy and confidentiality of their Personal Information.

The Clientèle Group, including its subsidiaries and affiliates is committed to protecting your Personal Information. When we refer to "Clientèle", "the Group", "our", "us", "we" or "company" in this Privacy Policy, it includes Clientèle and its related entities, as outlined in our Group structure below:



1.1. About Our Services

The Clientèle Group 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 including the underwriting of both life and non-life insurance products.

1.2. Policy Application

This policy applies to 1Life, which is a wholly owned subsidiary of the Clientèle Group, including, but not limited to, the following:

- Visitors of our website available at: <https://www.1life.co.za> (“website”).
- Visitors of our mobisite available at: <https://www.mypolicy.1life.co.za> (“mobisite”).
- Users of any of 1Life’s mobile applications (“Mobile App”).
- 1Life customers or policyholders as well as prospective customers or policyholders of 1Life.
- Any other users of 1Life’s products or services.

(all of the above stakeholders collectively referred to as ‘you’).

This Privacy Policy complies with the principles contained in the Electronic Communications and Transaction Act 25 of 2002 for electronically collecting Personal Information and the right to notify Data Subjects how we handle Personal Information given to the Clientèle Group as per the provisions of POPIA.

2. Collection of Personal Information

Personal Information (PI) is defined as, Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: 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; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; the biometric information of the person; the personal opinions, views or preferences of the person; 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; the views or opinions of another individual about the person; and 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.

This section outlines the various channels that we use to collect your Personal Information as well as the different types of Personal Information that we may collect about you:

- a. Should you enquire about any of our services or products via any online platforms or by contacting us telephonically, we may request you to provide us with personally identifiable information which includes, but is not limited to, the following:
 - Name.
 - Surname.
 - Contact details (which may include email addresses, mobile numbers and/or physical addresses).

- Email address.
 - Identity number.
- b. In addition and based on the nature and reason for your engagement with the Clientèle Group, we may also collect the following additional personally identifiable information from you:
- Identity and/or passport number.
 - Banking details (inclusion of account details and card details).
 - Indications that you have opted-in to receive marketing communication.
 - Information related to your past or current employment, tax number and financial or salary information.
 - Details of your family members or nominated beneficiaries (if cover is desired for such persons).
 - Limited medical history (for some applicable products).
 - Any other detail or information required to enable the Clientèle Group to comply with its obligation under any relevant laws or regulations (e.g. the Financial Advisory and intermediary Services Act).
- c. We may collect Personal Information about you from other sources which may include but 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 or products that we provide to provide to you.

2.1. Consent

By submitting your Personal Information to us in any of the manners as listed in paragraph 2 (c) above, you accept the terms and conditions of this Privacy Policy and explicitly consent to our Processing of your Personal Information in the manner described below. With regards to external sources, you agree to allow us to collect further Personal Information about you from external sources, including our third-party 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 Process your Personal Information in line with the provisions of this Privacy Policy.
- b. We Process 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. The Clientèle Group may use your Personal Information to send you information on new services or products that may be of interest to you and from time to time will call, mail, email or SMS information to you about The Group, our products and services, or our partners and their products or services.
- b. If you are not a Clientèle Group customer, or in any other instances where the law requires, the Group will only market to you by electronic communications with your consent.
- c. If you do not wish to continue receiving this information, you may contact the Clientèle Group, and we will remove you from our mailing list.
- d. We will only send you marketing communications if you have “opted in” to receiving such communications. You have the right to “opt out” of receiving marketing communications, whether by email or otherwise, at any time.

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 recognise 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 same 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 that you submit to us, when visiting our website, we may collect usage information which includes amongst others 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. When someone visits the website, a cookie is placed on the individual's machine (if the individuals accept cookies).

3. Storage and Disposal

- a. We may store 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 Privacy Policy.
- c. We may use third party service providers to help us deliver certain services and, in some instances, your Personal Information may 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 Privacy Policy.
- d. You may object at any time to us processing your Personal Information by way of contacting our Customer Services Department via telephone, 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 Privacy Policy.
- b. The Clientèle Group will only share your Personal Information:
- With third parties such as banks and card processors to provide you with the services requested.
 - Where it is necessary to protect the rights, property or safety of the Group users, or others, which may include the exchange of information with other organisations for aspects related to fraud and/or risk reduction.
 - As required in terms of any relevant laws or regulations.
- 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 Privacy 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 thereof.
- b. We use SSL Web Server Certificates to offer secure communications. At each point where Personal 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.

Notwithstanding the above, the Clientèle Group does not make any warranties or representations that your Personal Information 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 the Personal Information that the Group holds about you.
- c. to request rectification of any Personal Information that the Clientèle Group holds about.
- d. to request deletion or return, as permitted by law, of the Personal Information that the Clientèle Group holds about you, subject to data retention requirements as permitted by law.
- e. to request restriction of Processing of your Personal Information.
- f. to object to the Processing of your Personal Information as permitted by law.

We confirm that should you wish to exercise any of your rights as set out in this paragraph 6, you may contact our Customer Service Center at: 0860 105 194.

7. Change to Policy

We reserve the right to update (including without limitation, by the addition of new terms and conditions) this Privacy 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 Privacy Policy is clearer to you.

- c. To update any error that may be discovered from time to time.

You therefore agree to review this Privacy Policy whenever you visit 1Life's website for any such change.

8. Information Regulator

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

Telephone: 010 023 5200

Email: enquiries@informationregulator.org.za

9. Contact us at:

Clientèle Life Assurance Company Limited

Clientèle Office Park

Corner Rivonia and Alon Roads

Morningside

2196

Group Information Officer

Contact number: 011 320 3404

Name: Peter Robinson

Email: Privacy@clientele.co.za

Deputy Information Officer

Contact Number: 011 320 3131

Name: Phathutshedzo Makovhololo

Email: Privacy@clientele.co.za