

## Dignity Group's Privacy Notice

**This Privacy Notice describes how Dignity Group collects, uses, discloses, retains, and protects your personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws.**

The Privacy Notice applies to any website, application, form, document, product, or service which references this Privacy Notice. It also supplements any other privacy policies which may apply in respect of Dignity Group's processing of personal information.

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.

### 1. WHO WE ARE

In this Privacy Notice, any reference to "Dignity Group", "us" or "we" refers to Dignity Group Pty Limited operating in South Africa.

### 2. 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 application form, electronically, or by way of a hard copy;
- From employers, and other contracted entities in the context of group insurance policies; and
- Where relevant, from third-party sources, such financial intermediaries that are representatives of Dignity Group or entities that have agreements with Dignity Group, other financial institutions, credit bureaus, and fraud prevention agencies.

Where we require personal information in order to provide you with our products and services, your failure to provide us with the necessary information, will result in the Dignity Group 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 Dignity Group if your information changes.

### **3. COLLECTION OF INFORMATION BY THIRD PARTIES**

Owners or information system administrators of third-party websites that have links to the Dignity Group website, may collect personal information about you when you use these links. Dignity Group does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. Dignity Group does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform, or service.

Dignity Group also uses certain social networking services such as Facebook, WhatsApp, Instagram, and Twitter to communicate with the public and Dignity Group clients. When you communicate with Dignity Group 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 Dignity Group's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

Dignity Group will only provide data to third-party information exchange services with your consent.

### **4. INFORMATION WE COLLECT**

Your relationship with Dignity Group determines the exact nature of the personal information Dignity Group processes, and the purpose for which such personal information is collected and used. However, in many cases, if we are handling your personal information as part of our role as an insurer, the personal information we may process includes the following:

- Information about you – e.g., name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, current status of health, medical history and any existing conditions of each person insured. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties. We acknowledge that information about your health is special personal information. 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 – 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 and/or social media channels.

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- Financial information – we may process information related to payments you make or receive in the context of an insurance policy or claim. We may process other information for financial provisions in the context of providing financial advice and intermediary services.
- Contractual information – for example, details about the policies you hold and with whom you hold them.

In certain instances, we may need consent to process 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.

### **5. HOW WE USE YOUR INFORMATION**

We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner and/or controlling persons. We are also required by various laws to maintain a record of our dealings with clients.

In order for us to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, we need to collect, use and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.

To the extent permissible under applicable laws, Dignity Group may use your information:

- To provide you with our financial products and services, and maintain our relationship with you;
- To provide you with financial advice and intermediary services;
- To conclude and administer your application, which may include underwriting;
- To execute a transaction in accordance with your request;
- To assess, check, and process claims;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;

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- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the Financial Sector Conduct Authority and Prudential Authority);
- To undertake credit reference searches and/or verification;
- For the detection and prevention of unlawful activity, fraud, money-laundering as part of party due diligence required under applicable laws and in terms of Dignity Group policies;
- For debt recovery or debt tracing;
- For purposes of online login and authorisation;
- To execute Dignity Group strategic initiatives;
- To perform any risk analysis or for purposes of risk management to you or our business in general;
- 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;
- To maintain the security of our digital channels and systems;
- For statistical analysis and research purposes;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with the Dignity Group and to help us improve our offerings to you;
- To process your marketing preferences
- For any purpose related to and compatible with the above.

## 6. SHARING YOUR INFORMATION

Dignity Group will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to our third-party service providers who are involved in the delivery and/or administration of financial advice products and services or other insurers, public bodies, and law enforcement (either directly or through shared databases) for fraud detection and prevention.

Dignity Group will not sell, rent, or trade your personal information to any third party. Dignity Group will share information about you with financial advisers that are Dignity Group representatives or have intermediary agreements with Dignity Group.

### **Dignity Group 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 Financial Intelligent Center).

On occasion, Dignity Group may – for legitimate purposes – share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, Dignity Group will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.

## **7. 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 validation of claim that occurred outside the borders of RSA. 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.

## **8. SECURITY AND STORAGE OF INFORMATION**

Dignity Group intends to protect the integrity and confidentiality of your personal information. Dignity Group has implemented appropriate technical and organisational information security measures (including, but not limited to, using encryptions, limited access) 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.

## **9. 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 the Dignity Group PAIA manual.

## **10. CORRECTION OF YOUR INFORMATION**

In accordance with POPIA, you have a right to correct any of your personal information held by Dignity Group. This right should be exercised in accordance with the procedure outlined in the Dignity Group PAIA manual.

## **11. 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.

## **12. 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.

## **13. CHILDREN**

While few contents, if any, on Dignity Group's website is directed towards children, Dignity Group is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

## **14. UPDATES**

This privacy statement was last updated on 30 June 2021. A notice will be posted on the Dignity Group 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.

## **15. QUESTIONS REGARDING THIS STATEMENT**

Questions, comments, and requests regarding this statement may be directed to [info@dignitygroup.co.za](mailto:info@dignitygroup.co.za) for clarification.

## **16. PARTICULARS OF DIGNITY GROUP**

Should you have a complaint or concern regarding the processing of your personal information, your complaint may be submitted to [complaints@dignitygroup.co.za](mailto:complaints@dignitygroup.co.za). Dignity Group is a licensed insurer and financial services provider.

Our head office's registered address is 8 Balfour Road, Vincent, East London, Eastern Cape, South Africa, 5247. For more information on the Dignity Group, please visit our website.

## **17. THE INFORMATION REGULATOR**

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)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O.

Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)