

POPI and Privacy Policy

SCOPE

This POPI and Privacy policy is applicable to all employees, contractors, consultants, service providers, temporary and other workers at SMH Group, including all personnel affiliated with third parties involved with SMH Group and is mandatory.

This policy applies to information assets owned or leased by SMH Group, or devices that connect to SMH Group's network or resides at SMH Group's site.

This policy will be revised and accepted annually and/or as required for continued applicability, to be compliant with Business practices, as required by law, security review requirements and/or because of significant Information Security incidents, new vulnerabilities and changes to organisational or technical infrastructure.

All parties to which this policy applies must familiarise themselves with this policy and sign the undertaking.

Changes will be communicated in writing.

If a person or party to which to this policy is applicable has any doubt about the application of the code, he/she must discuss the matter with the Information Officer of SMH Group.

1. Introduction

- 1.1. Where this policy refers to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information. As a general rule we will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or is an obligation in a contract.
- 1.2. Where this policy refers to “SMH Group” it specifically refers to any Company Affiliated with the SMH Group.
- 1.3. SMH Group may combine personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- 1.4. This policy establishes a general standard for the appropriate protection of personal information (POPI) within SMH Group environment, furthermore, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

2. Policy Statement

- 2.1. What is personal information?
 - 2.1.1. Personal information refers to any information that identifies a Data Subject or specifically relates to a Data Subject, or employees stored or processed on the premises. Personal information includes, but is not limited to, the following information about a Data Subject and / or employees:
 - 2.1.1.1. Marital status;
 - 2.1.1.2. National origin;
 - 2.1.1.3. Age;
 - 2.1.1.4. Language;
 - 2.1.1.5. Birth place;
 - 2.1.1.6. Education;
 - 2.1.1.7. Relevant financial history;
 - 2.1.1.8. Identifying number (like an employee number, identity number or passport number);

- 2.1.1.9. E-mail address; physical address (like residential address, work address or physical location); telephone number;
- 2.1.1.10. Biometric information (like fingerprints, signature or voice);
- 2.1.1.11. Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation;
- 2.1.1.12. Physical health; mental health; well-being; disability; religion; belief; conscience; culture;
- 2.1.1.13. Medical history; criminal history; employment history;
- 2.1.1.14. Personal views, preferences and opinions;
- 2.1.1.15. Another's views or opinions about you;
- 2.1.1.16. Full names and initials Personal information includes special personal information, as explained below.

2.2. When will SMH Group process personal information?

- 2.2.1. SMH Group will only process personal information for lawful purposes relating to the business if the following applies:
- 2.2.2. If The Data Subject has consented thereto;
- 2.2.3. If a person legally authorised by The Data Subject, the law or a court, has consented thereto;
- 2.2.4. If it is necessary to conclude or perform under a contract SMH Group has with The Data Subject;
- 2.2.5. If the law requires or permits it;
- 2.2.6. If it is required to protect or pursue, SMH Group's or a third party's legitimate interest.

2.3. What is special personal information? Special personal information is personal information about the following:

- 2.3.1. Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded);
- 2.3.2. Ethnic origin;

- 2.3.3. Trade union membership;
 - 2.3.4. Health (like where there is applied for an insurance policy);
 - 2.3.5. Biometric information (like to verify identity); and / or criminal behaviour and alleged commission of an offense.
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- 2.4. When will SMH Group process special personal information?
 - 2.4.1. SMH Group may process special personal information in the following circumstances:
 - 2.4.2. If The Data Subject has consented to the processing;
 - 2.4.3. If the information is being used for any Human Resource or payroll related requirements;
 - 2.4.4. If the processing is needed to create, use or protect a right or obligation in law;
 - 2.4.5. If the processing is for statistical or research purposes and all legal conditions are met;
 - 2.4.6. If the special personal information was made public by the data subject;
 - 2.4.7. If the processing is required by law.
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- 2.5. When and from where SMH Group obtains personal information about the data subject
 - 2.5.1. SMH Group collects personal information from the data subject directly.
 - 2.5.2. SMH Group may collect personal information from a public record or if the data subject has deliberately made the information public.
 - 2.5.3. SMH Group collects personal information from 3rd parties that are directly integrated with their software platform.
 - 2.5.4. SMH Group collects information about The Data Subject based on use of their products, services or service channels.
 - 2.5.5. SMH Group collects information about The Data Subject based on how The Data Subject engages or interacts with SMH Group such as via emails, letters, telephone calls and surveys.
 - 2.5.6. SMH Group collects personal information from completed forms i.e. contact and billing information if the law requires SMH Group to do so, SMH Group will ask for consent before collecting personal information. The third parties from whom SMH Group may collect personal information includes, but is not limited to, the following:

- 2.5.7. Our partners, employer, employees directly, any of our other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionary, delegates, assigns, affiliates or successors in title and/or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
- 2.5.8. spouses, dependents, partners, employer, and other similar sources;
- 2.5.9. people The Data Subject has authorised to share personal information, like a person that makes a travel booking on behalf of a medical practitioner for insurance purposes;
- 2.5.10. attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- 2.5.11. payment processing services providers, merchants, banks and other persons that assist with the processing of payment instructions, like EFT transaction partners;
- 2.5.12. insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- 2.5.13. law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- 2.5.14. regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- 2.5.15. trustees, Executors or Curators appointed by a court of law;
- 2.5.16. SMH Group's service providers, agents and sub-contractors like couriers and other persons SMH Group uses to offer and provide products and services to the data subject;
- 2.5.17. courts of law or tribunals.

2.6. Reasons SMH Group needs to process personal information:

2.6.1. SMH Group will process personal information for the following reasons:

- 2.6.2. to provide The Data Subject with products, goods and services;

- 2.6.3. to market SMH Group's products, goods and services to The Data Subject;
 - 2.6.4. to respond to enquiries and complaints;
 - 2.6.5. to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
 - 2.6.6. to conduct market and behavioural research, including scoring and analysis to determine if SMH Group qualifies for products and services or to determine credit or insurance risk;
 - 2.6.7. to develop, test and improve products and services for The Data Subject;
 - 2.6.8. for historical, statistical and research purposes, like market segmentation;
 - 2.6.9. to process payment instruments;
 - 2.6.10. to create, manufacture and print payment advice;
 - 2.6.11. to enable SMH Group to deliver goods, documents or notices to The Data Subject;
 - 2.6.12. for security, identity verification and to check the accuracy of personal information;
 - 2.6.13. to communicate with The Data Subject and carry out instructions and requests;
 - 2.6.14. for customer satisfaction surveys, promotional offerings;
 - 2.6.15. to enable The Data Subject to take part in and make use of value-added products and services;
 - 2.6.16. to assess SMH Group's lending and insurance risks; and/or;
 - 2.6.17. for any other related purposes.
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- 2.7. How SMH Group uses personal information for marketing purposes;
 - 2.7.1. SMH Group will use personal information to market our services, related products and services to The Data Subject in line with SMH Group's Direct Marketing Policy;
 - 2.7.2. SMH Group may also market non-banking or non-financial products, goods or services to The Data Subject;
 - 2.7.3. SMH Group will do this in person, by post, telephone, or electronic channels such as SMS, email and fax;

- 2.7.4. If The Data Subject is not our customer, or in any other instances where the law requires, SMH Group will only market to The Data Subject by electronic communications with consent;
 - 2.7.5. In all cases The Data Subject can request to opt-out of receiving marketing communications at any time.
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- 2.8. When, how and with whom SMH Group shares personal information in general SMH Group will only share personal information if any one or more of the following applies:
 - 2.8.1. If The Data Subject has consented to this;
 - 2.8.2. If it is necessary to conclude or perform under a contract SMH Group has with The Data Subject
 - 2.8.3. If the law requires it; and/or
 - 2.8.4. If it's necessary to protect or pursue, SMH Group's or a third party's legitimate interests where required, each member of SMH Group may share personal information with the following persons. These persons have an obligation to keep personal information secure and confidential. Other members of SMH Group, its associates, cessionary, delegates, assigns, affiliates or successors in title and/or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
 - 2.8.5. SMH Group's employees as required by their employment conditions;
 - 2.8.6. Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
 - 2.8.7. Payment processing services providers, merchants, banks and other persons that assist with the processing of payment instructions, like 3rd party EFT service providers;
 - 2.8.8. Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
 - 2.8.9. Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires us to share personal information with;

- 2.8.10 SMH Group's service providers, agents and sub-contractors like couriers and other persons SMH Group uses to offer and provide products and services to The Data Subject;
- 2.8.11 Persons to whom SMH Group has ceded its rights or delegated its obligations to under agreements, like where a business is sold;
- 2.8.12 Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- 2.8.13 Trustees, Executors or Curators appointed by a court of law;
- 2.8.14 Participating partners in SMH Group's customer loyalty reward programmes, where The Data Subject purchases goods, products and services or spends loyalty rewards; and/or SMH Group's joint ventures and other partners with whom SMH Group has concluded business agreements.

2.9 Under what circumstances will SMH Group transfer information to other countries?

- 2.9.10 SMH Group will only transfer personal information to third parties in another country in any one or more of the following circumstances:
 - 2.9.10.1 Where personal information will be adequately protected under the other country's laws or an agreement with the third party recipient;
 - 2.9.10.2 Where the transfer is necessary to enter into or perform under a contract with The Data Subject, or a contract with a third party that is in The Data Subject's interest;
 - 2.9.10.3 Where The Data Subject has consented to the transfer; and/or;
 - 2.9.10.4 Where it is not reasonably practical to obtain consent and the transfer is in the interest of The Data Subject. This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing personal information in the other country will agree to apply the same level of protection as available by law in country or if the other country's laws provide better protection the other country's laws would be agreed to and applied. An example of SMH Group transferring personal information to another country is where foreign payments take place if The Data Subject purchases goods or services in a foreign country, or request that SMH Group facilitates salary payments to employees in the countries.

2.10 Duties and rights about the personal information SMH Group has on file.

2.10.10 The Data Subject must provide proof of identity when enforcing the rights below;

2.10.11 The Data Subject must inform SMH Group when personal information changes. Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how The Data Subject can give effect to the rights listed below;

2.10.12 The Data Subject has the right to request access to the personal information SMH Group has about The Data Subject by contacting SMH Group. This includes requesting:

2.10.12.1 Confirmation that SMH Group holds personal information;

2.10.12.2 A copy or description of the record containing personal information; and;

2.10.12.3 The identity or categories of third parties who have had access to personal information;

2.10.13 SMH Group will attend to requests for access to personal information within a reasonable time.

2.10.14 The Data Subject may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties.

2.10.15 Please note that the law may limit rights to access information.

2.10.16 The Data Subject has the right to request SMH Group to correct or delete the personal information SMH Group holds if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or SMH Group is no longer authorised to keep it.

2.10.17 The Data Subject must inform SMH Group of any requests in writing. Please refer to SMH Group's PAIA Manual for further information in this regard, like the process The Data Subject should follow to give effect to this right.

2.10.18 It may take up to fifteen (15) business days for the change to reflect on SMH Group's systems.

2.10.19 SMH Group may request documents from The Data Subject to verify the change in personal information.

- 2.10.20 A specific agreement that The Data Subject has entered into with SMH Group may determine how SMH Group must change the personal information provided at the time when The Data Subject entered into the specific agreement.
- 2.10.21 Please adhere to these requirements. If the law requires SMH Group to keep the personal information, it will not be deleted upon any requests. The deletion of certain personal information may lead to the termination of the relationship with SMH Group. The Data Subject may object on reasonable grounds to the processing of personal information.
- 2.10.22 SMH Group will not be able to give effect to the objection if the processing of personal information was and/is permitted by law; The Data Subject has provided consent to the processing and SMH Group's processing done according to consent or the processing is necessary to conclude or perform under a contract with The Data Subject.
- 2.10.23 The Data Subject must inform SMH Group of any objection in writing. Please refer to SMH Group's PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.
- 2.10.24 Where The Data Subject has provided consent for the processing of personal information, they may withdraw consent. If they withdraw consent SMH Group will explain the consequences to them. SMH Group may proceed to process personal information even if they have withdrawn consent if the law permits or requires it. It may take up to fifteen (15) business days for the change to reflect on SMH Group's systems, during this time SMH Group may still process personal information.
- 2.10.25 The Data Subject has a right to file a complaint with SMH Group or any Regulator with jurisdiction about an alleged contravention of the protection of personal information by SMH Group. SMH Group will address any complaint as far as possible.

2.11 How SMH Group secures personal information.

- 2.11.10 SMH Group will take appropriate and reasonable technical and organisational steps to protect personal information according to industry best practices. SMH Group's security

measures (including physical, technological and procedural safeguards) will be appropriate and reasonable. This includes the following:

- 2.11.10.1 Keeping systems secure (like monitoring access and usage);
- 2.11.10.2 Storing records securely;
- 2.11.10.3 Controlling the access to buildings, systems and/or records; and;
- 2.11.10.4 Safely destroying or deleting records;
- 2.11.10.5 Ensure compliance with international security standards;

2.12 How long does SMH Group keep personal information?

- 2.12.10 SMH Group will keep personal information for as long as:
 - 2.12.10.1 The law requires it to be kept;
 - 2.12.10.2 A contract between The Data Subject and SMH Group requires it to be kept;
 - 2.12.10.3 The Data Subject has consented to it being kept;
 - 2.12.10.4 SMH Group is required to keep it to achieve the purposes listed in this Privacy Policy;
 - 2.12.10.5 SMH Group requires it for statistical or research purposes;
 - 2.12.10.6 A code of conduct requires SMH Group to keep it; and/or;
 - 2.12.10.7 SMH Group requires it for our lawful business purposes Note: SMH Group may keep personal information even if The Data Subject no longer has a relationship with us, for the historical data that may be required by employer or employee.

2.13 Children's Privacy:

- 2.13.10 SMH Group's Service does not address anyone under the age of sixteen (16). SMH Group do not knowingly collect personally identifiable information from anyone under the age of sixteen (16). If The Data Subject is a parent or guardian and The Data

Subject is aware that it's child has provided SMH Group with personal data, SMH Group must be contacted. If SMH Group become aware that SMH Group has collected Personal Data from anyone under the age of sixteen (16), without verification of parental consent, SMH Group must take steps to remove that information from it's servers. If SMH Group needs to rely on consent as a legal basis for processing information, requires consent from a parent, SMH Group may require parent's consent before SMH Group collects and uses that information.

2.14 Our cookie policy:

2.14.10 A cookie is a small piece of data sent from SMH Group's websites or applications to The Data Subject's computer or device hard drive or Internet browser, where it is saved. The cookie contains information to personalise The Data Subject's experience on SMH Group's websites or applications and may improve the experience on the websites or applications. The cookie will also identify devices, like the computer or smart phone. By using SMH Group's websites or applications The Data Subject agrees that cookies may be forwarded from the relevant website or application to a computer or device. The cookie will enable SMH Group to know that you have visited the website or application before and will identify The Data Subject. SMH Group may also use the cookie to prevent fraud and for analytics.