

Protocol Privacy Notice

Protocol Risk Managers (Pty) Ltd respects the right to privacy and confidentiality of our potential and existing client's personal information. We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This privacy notice is meant to help you understand how we collect, use, share and protect your personal information. Protocol subscribes to the conditions of the Protection of Personal Information Act (POPIA) as well as the principles set out in Section 51 of the Electronic Communications and Transactions Act 25 of 2002 to make sure that you are always protected when supplying us with personal information. The Protection of Personal Information Act 9 (POPIA) describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person to whom personal information relates is referred to as the "data subject".

What type of personal information do we collect?

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose. When personal information is collected, the company will indicate the purpose for the collection and whether the information required is compulsory or voluntary. Examples of personal information include, but are not limited to, contact information, financial information, information relating to race, gender, sexual orientation, age, contact details, identity number, religion, name, culture, language and nationality.

How we collect personal information?

The company collects information either directly from the data subject, the employer or through intermediaries. The source from which personal information was obtained, if not directly from the data subject, will be disclosed.

Use of personal information

After obtaining consent, the personal information collected or held by Protocol may be used, stored, transferred or disclosed or shared only for the purposes for which it was collected or agreed with you. This may include:

- For underwriting purposes;
- To assess and process claims;

- Providing on-going administration services for the duration of the contract;
- Fulfilling a transaction on request of a data subject;
- To respond to your inquiries and/or complaints;
- To confirm and verify your identity or to verify that you are an authorised person for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice.

Records of personal information will be retained for the period necessary for achieving the purpose for which the information was collected. Please note that you have a right to object to the processing of your personal information for example for purposes of direct marketing, unless consent was obtained from you.

Methods of processing

Data processing is carried out using computers and/or IT-enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In some cases, the data may be accessible to certain types of persons in charge, involved with the operations inside Protocol (underwriting, compliance, marketing, legal, system administration, etc.) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as data processors by Protocol.

Our Website

- We take reasonable and necessary precautions to secure your transactions on our website - however, we cannot guarantee the confidentiality of your transactions.
 - Using this website is entirely at your own risk.
- Protocol will not be held legally responsible for any personal information that you reveal to a third party, which has a link on the www.protocoluma.co.za website. It is important that you refer to that third party's privacy notice before you reveal any of your personal information. Analytics
- Services contained in this section enable Protocol to monitor and analyse web traffic and can be used to keep track of user behaviour.
- Google Analytics and Hotjar may be used. These are web analysis service providers that utilize the data collected to track and examine the use of the Protocol website, to prepare reports on its activities to improve the site's user experience and performance. Each web service provider is responsible for adherence to relevant data protection rules which can be obtained via their own Privacy Notice. <https://www.hotjar.com/legal/policies/privacy>
<https://policies.google.com/privacy?hl=en&gl=uk> Cookies and usage data
 - Place of processing: US

- A cookie is a small text file stored on your device by the website you are visiting.
- The Protocol website may make use of cookie and tracking technology, where information that you send while on the website, is saved on your hard drive. This allows the Protocol website to recognise you on your next visit. This technology is useful for gathering information, such as the type of browser and operating system you use. The information will enable us to track the number of visitors to our website and understand how visitors use it. Personal information cannot be collected via cookie technology.
- You can limit the collection of your information by disabling cookies on your browser. You may also be able to modify your browser settings to require your permission each time a site attempts to set a cookie. However, Protocol relies on cookies to enable certain functionality. If you choose to disable cookies, you will still have access to the website and its functions, but some of the services available on our website may not work properly.
- This privacy notice may be amended from time to time without any notice to you. Every time you use our website, you are automatically bound to the privacy notice that is current at that moment.

Disclaimer

- Apart from the provisions of sections 43(5) and 43(6) of the Electronic Communications and Transactions Act, as amended, Protocol nor any of its agents or representatives shall be liable for any damage, loss or liability of whatsoever nature arising from the use or inability to use this web site or the services or content provided from and through this web site. Furthermore, Protocol makes no representations or warranties, implied or otherwise, that, amongst others, the content and technology available from this website are free from errors or omissions or that the service will be 100% uninterrupted and error free. Users are encouraged to report any possible malfunctions and errors to the webmaster.
- Information, ideas and opinions expressed on this site should not be regarded as professional advice of Protocol, but users are encouraged to consult professional advice before taking any course of action related to information, ideas or opinions expressed on this site.
- Neither Protocol nor any of its agents or representatives shall be liable for any damage, loss or liability of whatsoever nature arising from the use or inability to use this web site or the information on this web site. Sharing of personal information Protocol will only share your personal information with third parties if you have consented to such disclosure. If consent has been obtained, the company may share your personal information with third parties who are involved in the delivery of services to you. We have agreements in place to ensure that they comply with the Protection of Personal Information Act, No 4 of 2013. Where Protocol discloses personal information to any third parties, the third party will be obliged to use that personal information only for the reasons and purposes it was disclosed for. We may be obliged to disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of clients, for example fraud prevention or to give effect to an agreement. Securing personal information Protocol processes the data of data subjects in a proper manner and shall take appropriate security measures to prevent loss of,

damage of personal information, unauthorised access, disclosure, modification, or unauthorised destruction of the data. The company will store all the personal information in secured environments, for example on secured servers in a protected data centre.

Right to access and rectify personal information collected You have the right to request to review your personal information contained by Protocol at any time to correct or update the information. If the purpose for which your personal information was requested initially does not exist anymore, for example you no longer have an active contract, you may request information held by the company to be removed. However, Protocol can decline your request to delete the information from its records if other legislation requires the continued retention thereof or if it has been de-identified. If

you would like to obtain a copy of your personal information held by Protocol, please review our information manual located at https://Protocol.co.za/wp-content/uploads/2020/02/INFORMATION-MANUAL_2020.pdf **Right to lodge a Complaint to the Information Regulator** Any person may submit a complaint to the Regulator alleging interference with the protection of the personal information of a data subject. Updating this Notice Please note that we may amend this Notice from time to time.

Please check this website periodically to inform yourself of any changes. **How to Contact us** This Privacy Notice applies to Protocol Group (Pty) Ltd, incorporating all its operating entities. Please direct any questions, complaints or concerns regarding this privacy notice, data privacy and our treatment of your Personal Information to the following: Email: dataprivacy@mmltd.co.za Upon receiving your request, we will contact you directly, investigate your request, and work to address your concerns. We will respond to your request without undue delay. We reserve the right to take reasonable steps to verify your identity prior to granting access or processing changes or corrections.

INFORMATION REGULATOR You have the right to complain to the Information Regulator, whose contact details are: Tel: 012 406 4818 Fax: 086 500 3351 Email: inforeg@justice.gov.za