



The EasyPay Insurance Privacy Policy

Underwritten by The Smart Life Insurance Company Limited

February 2023

PRIVACY POLICY

The Protection of Personal Information Act 4 of 2013 (POPIA) is the comprehensive data protection legislation enacted in South Africa. POPIA aims to give effect to the constitutional right to privacy, whilst balancing this against competing rights and interests, particularly the right of access to information. The Smart Life Assurance Company Limited (“Smart Life”) values the importance of protecting your personal information.

Smart Life and EasyPay Insurance has also developed a Privacy Statement which is attached as Appendix 1.

Personal information for the purpose of this document means all information specific to you, which is provided to Smart Life and EasyPay Insurance as a result of various interactions with yourself, in other words, information that identifies you. This includes for example, the following personal information that you may provide to Smart Life and EasyPay Insurance for various reasons:

- Your name and surname;
- Age;
- Marital Status;
- Identity Number;
- Date of Birth;
- Contact Numbers;
- Email Address etc.

Smart Life and EasyPay Insurance values the information you choose to provide and which we collect from you and will take reasonable steps to protect your personal information from loss, misuse or unauthorized alteration. Your personal information is maintained in a manner that ensures the privacy and confidentiality of that information.

However, please note that Smart Life and EasyPay Insurance cannot guarantee the absolute security of any personal information that you disclose to us. However, we will continue to maintain incident management processes to ensure that breaches are identified and reported both to the affected clients and the Information Regulator. This responsibility is assigned to the Information Officer and the Information Regulator.

Smart Life and EasyPay Insurance will use your personal information only as appropriate in the normal course of business. The following are reasons why we would collect your personal information:

- To identify you;
- To process your instructions to us;
- To manage your policy;
- To conduct direct marketing to you, subject to your consent, and
- To comply with any court order or any law or in the interest of justice.

Smart Life and EasyPay Insurance does not permit the selling or providing of personal information to third parties for independent use. At Smart Life and EasyPay Insurance we may, however, share your personal information with our partners if that information is required to provide you with the product or services requested by you. Our business partners will limit their use of your personal information as directed by Smart Life and EasyPay Insurance and in your best interest.

Smart Life and EasyPay Insurance will disclose your personal information when required to do so:

- By any regulatory authority (that is, the FSCA, PA, FIC etc.);
- To comply with any regulation passed under relevant legislation, or any legal process;
- To protect and defend Smart Life and EasyPay Insurance's rights and property (including Smart Life and EasyPay Insurance's intellectual property), or
- When you have expressly authorized Smart Life and EasyPay Insurance to do so.

With your consent, Smart Life and EasyPay Insurance may also contact you about our products which we believe may be of interest to you. If at any stage after you have given us your consent, you change your mind and no longer wish us to contact you about our products, we will respect your decision. You will always be given the opportunity to instruct us to remove your contact details from our mailing list.

This Privacy Policy will be governed by and will be construed and interpreted in accordance with the laws of the Republic of South Africa. When you interact with us in any manner whatsoever and, in the process, provide us with your personal information, you will be agreeing to the provisions set out above.

REVIEW

Smart Life and EasyPay Insurance reserve the right in our sole discretion to amend this Privacy Policy from time to time.

Contact details EasyPay Insurance – The Smart Life Insurance Company Limited

Any Data Subject may any time contact the EasyPay Insurance Information Officer directly at Smart Life and EasyPay Insurance:

Attention: Information Officer

President Place, 3rd Floor, Cnr. Jan Smuts Ave & Bolton Road, Rosebank, 2196.

P.O Box 2121, Parklands, 2424.

Tel +27 (11) 343 2000.

Email: simon.hebron@smartlife.co.za

Website: www.smartlife.co.za

Appendix 1 Privacy Statement

PRIVACY STATEMENT

Date

The Smart Life Insurance Company Limited (“Smart Life”), EasyPay Insurance and the Lesaka Group (“Lesaka”) recognises its obligation to comply with the requirements of the Protection of Personal Information Act 4 of 2013 (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA)

Statement 1:

Accountability

Smart Life and EasyPay Insurance recognises itself as a responsible party under POPIA and as an operator in respect of individual policyholders, employers and other corporate entities who make use of our services and products. Due care and security of personal information as well as compliance with applicable laws will be adopted across Smart Life and EasyPay Insurance, regardless of the role that Smart Life and EasyPay Insurance plays.

Statement 2:

Processing limitation

All personal information collected and used by Smart Life and EasyPay Insurance is done so lawfully and in a reasonable way that does not infringe on the privacy rights of Data Subjects. As far as possible, the principle of minimality (adequate, relevant and necessary) is upheld for all business activities – where the minimum set of data or information is processed to achieve the purpose. The minimum of names, surname, identity number or date of birth, salary, occupation and data required to assess a “needs analysis” are compulsory data fields for all Data Subjects.

Any other data field is mandatory.

Statement 3:

Purpose specification

At all times, personal information is to be used for specific purposes only, and a record of these purposes is documented and maintained by the business unit making use of the personal information. Data Subjects are to be made aware, by Smart Life and EasyPay Insurance or the relevant responsible party if not Smart Life and EasyPay Insurance, of the purposes for which Smart Life and EasyPay Insurance collects and uses their personal information at the point where it is collected or during any future interactions with the Data Subject. Suitable records management policies, processes, standards and guidelines are developed to ensure appropriate retention, restriction, archival, deletion and destruction of records of personal information. Records of personal information are only kept for as long as a Data Subject has a relationship with Smart Life and EasyPay Insurance, or as otherwise permitted by law or a contractual agreement, following which they are suitably disposed of or otherwise securely archived for historical or evidentiary purposes.

Statement 4:

Further processing

Any additional processing of personal information across Smart Life and EasyPay Insurance must be compatible with the original purpose(s) for which it was collected. For an incompatible or additional purpose of processing, Smart Life and EasyPay Insurance or the relevant responsible party if not Smart Life and EasyPay Insurance, must notify Data Subjects of this new purpose and obtain their consent, if necessary. Where appropriate, as a financial services provider, Smart Life and EasyPay Insurance may process personal information for the following additional purposes, which are considered compatible or provided for in law:

- a. Compliance with any laws applicable to Smart Life and EasyPay Insurance;
- b. To protect its employees, clients, employers and their members, third parties and other stakeholders against financial loss due to dishonesty, malpractice, improper conduct, unfitness or incompetence of Data Subjects within Smart Life and EasyPay Insurance, even without their consent; or
- c. To provide holistic integrated insurance solutions for responsible parties as provided for in contractual agreements, or as otherwise directed by responsible parties.

If information is de-identified and cannot be linked back to a Data Subject, then further processing may take place without the need for notification or consent of the Data Subject. At all times, personal information is to be used for specific purposes only, and a record of these purposes is documented and maintained by the business unit making use of the personal information. Data Subjects are to be made aware, by Smart Life and EasyPay Insurance or the relevant responsible party if not Smart Life and EasyPay Insurance, of the purposes for which Smart Life and EasyPay Insurance collects and uses their personal information at the point where it is collected or during any future interactions with the Data Subject. Suitable records management, policies, processes, standards and guidelines are developed to ensure appropriate retention, restriction, archival, deletion and destruction of records of personal information. Records of personal information are only kept for as long as a Data Subject has a relationship with Smart Life and EasyPay Insurance, or as otherwise permitted by law or a contractual agreement, following which they are suitably disposed of, as far as reasonably possible, or otherwise securely archived for historical or evidentiary purposes.

Statement 5:

Information quality

Smart Life and EasyPay Insurance will take reasonable steps to ensure that all personal data and information is kept accurate, complete, up to date and not misleading as is necessary for the purposes for which it is processed. Data enrichment or remediation from third-party sources is permitted provided that an appropriate assessment has been done by the Smart Life and EasyPay Insurance' privacy office.

Statement 6:

Openness

Smart Life and EasyPay Insurance will maintain a PAIA Manual as contemplated in section 51 of PAIA. The PAIA Manual will be made publicly available on the Smart Life and EasyPay Insurance website. All PAIA requests and procedures are to be managed by the Smart Life and EasyPay Insurance' privacy office. Where personal information is collected, the Data Subject is made aware of at least the following:

- a. What the personal information will be used for;
- b. Consequences of the failure to provide this information;
- c. Any laws which authorise such collection or processing;
- d. Whether information will be transferred to third parties or across international borders;
- e. The rights the Data Subjects have in terms of their personal information; and
- f. If any of the information will be used for automated decision-making and profiling, suitable logic surrounding such processing and any consequences of such automated processing.

A Data Subject may at any time object to the processing of voluntary Personal Information that is not regarded as minimal in terms of the Act

Statement 7:

Security safeguards

Smart Life and EasyPay Insurance establishes, reviews and maintains adequate technical and organisational security measures to deal with the confidentiality and integrity of personal information in its possession and to manage associated risks. Smart Life and EasyPay Insurance establishes due diligence procedures for assessing the use of third-party service providers, and these procedures are always adhered to when the third party will process or have access to personal information. Where Smart Life and EasyPay Insurance uses third parties to process personal information, if applicable under POPIA, consent will be obtained from any responsible parties.

Smart Life and EasyPay Insurance may require standardised contractual clauses be included in all agreements to ensure that privacy, security, data processing and breach notification requirements are met. On termination of an agreement or contract with a responsible party, Smart Life and EasyPay Insurance will return all personal information to the client unless:

- a. Directed or permitted by law to keep the personal information beyond termination of the agreement;
- b. Instructed by the client to retain the information on its behalf; or
- c. The Data Subject(s) have consented in writing to the personal information being kept

Statement 8:**Data Subject participation**

Appropriate channels and mechanisms may be established such that Data Subjects can freely gain access to and correct their personal information, or exercise any rights that they have under applicable privacy and data protection laws. Unless otherwise stipulated, funds authorise Smart Life and EasyPay Insurance to respond to valid requests for access to personal information on their behalf.

Statement 9:**Special personal information**

Wherever categories of special personal information are used across the Smart Life and EasyPay Insurance business, stricter controls are implemented to ensure that it is suitably protected, including encryption, stringent access controls to systems and data, records of access to all sensitive personal information should be kept. Consent does not need to be obtained if required by law (such as employment equity, disability, health and safety or other regulations). For any other purposes, explicit consent for the processing of any categories of special personal information must be obtained and kept as evidence. Explicit consent must be obtained from parents, legal guardians or caregivers in cases where the information concerning children (minors under the age of 18) or people incapable of managing their own affairs (people with diminished mental capacity) is collected or processed.

Statement 10:**Direct marketing**

Smart Life and EasyPay Insurance does engage in direct marketing. Where these activities do take place, all direct marketing activities are to be reviewed and approved by the Smart Life and EasyPay Insurance privacy office prior to implementation and roll-out. Direct marketing activities must comply with any policies and standards as issued by Smart Life and EasyPay Insurance. Smart Life and EasyPay Insurance ensures, where voluntary or optional communications are provided to Data Subjects regarding the provision of products or services, that opt-out mechanisms are implemented to uphold such requests from the Data Subjects. Subject to consent from a responsible party (individual, employer, third-party), Smart Life and EasyPay Insurance may send promotional messages to Data Subjects on an opt-out [or opt-in] basis as required by law.

Statement 11:**Automated decision-making**

Occasionally, Data Subjects may be subjected to a decision which is based exclusively on an automated system which forms part of a contractual agreement with the Data Subject or where they have provided consent to such processing. Automated decision-making includes profiling and behavioural or other tracking activities. Automated decision-making and profiling based on special categories of personal information must be approved by the Smart Life and EasyPay Insurance privacy office. Smart Life and EasyPay Insurance must provide Data Subjects with a process whereby they may make representation about any decision made by such a system or its associated processing, so that the logic of the decision can be explained.

Statement 12:

Cross-border information flows

Smart Life and EasyPay Insurance does not transfer Personal Information to a foreign country or international organisation and, if so required in future, will adhere to all the requirements stipulated in POPIA for the transmission of personal information across international borders.

Statement 13:

Intragroup data transfers or requests

Smart Life and EasyPay Insurance has a privacy policy to which all stakeholders are bound. Consequently, if there are no conflicts of interest and the privacy rights of Data Subjects are protected, and appropriate security safeguards are applied, personal data and information may be shared between Lesaka Group entities to achieve the purpose for which it was collected.

Statement 14:

Data breach reporting

Suitable processes and procedures are established for breach- and incident notification. Smart Life and EasyPay Insurance has a policy in place to receive notification and details of all data breaches from its IT service provider.

Incoming:

Upon becoming aware of a breach, incident or other unauthorised access to personal information in their possession, all third parties and other stakeholders in Smart Life and EasyPay Insurance must report such an incident directly via email at informationofficer@smartlife.co.za. Upon receipt of any such notification, the Group IT employee must immediately notify the Smart Life and EasyPay Insurance privacy office.

Outgoing:

As a responsible party, should a breach or incident related to personal information occur, Smart Life and EasyPay Insurance will notify the Information Regulator and Data Subject as soon as details of the breach or incident are available, but within the best practice guidelines of a maximum of 72 hours following confirmation of the breach. Any affected Data Subjects will be notified as soon as reasonably practical after a breach or incident has been discovered, and will always include the following information:

- a. The personal information compromised in the breach;
- b. The potential consequences that the breach may have on them;
- c. The steps that Smart Life and EasyPay Insurance has taken or will take to address the breach;
- d. Any steps that the Data Subject can take to protect themselves against the consequences of the breach; and

- e. If known, or at the guidance of the Information Regulator, the identity of the individual(s) who gained unauthorised access to the personal information.

Where Smart Life and EasyPay Insurance is the operator, if a breach or incident is discovered within any Smart Life and EasyPay Insurance business unit relating to a client that is a responsible party, the responsible party will be notified, and Smart Life and EasyPay Insurance will take guidance from the responsible party on how best to resolve the matter. Smart Life and EasyPay Insurance will not report breaches to the Information Regulator directly or otherwise interact with them without instruction from the responsible party. All reported breaches and incidents are maintained by the Smart Life and EasyPay Insurance privacy office on a centralised register.

Statement 15:

Regulatory authorisation

Smart Life and EasyPay Insurance is required to identify instances where prior authorisation is required from the Information Regulator, and to make requests to the Information Regulator in accordance with its prescribed processes and guidelines. Where Smart Life and EasyPay Insurance is the operator, it is the duty of the responsible party to ensure that such authorisation is required and that the necessary approval is obtained from the Information Regulator. Should Smart Life and EasyPay Insurance identify or become aware of a processing activity which requires such authorisation, the responsible party will be notified accordingly. Records of prior authorisation requests and responses, or outcomes of such requests from the Information Regulator are maintained by the Smart Life and EasyPay Insurance privacy office.

Statement 16:

Privacy impact assessments

Privacy impact assessments must be performed for the entire business at Smart Life and EasyPay Insurance on an annual basis. Targeted privacy impact assessments may be performed for those areas of the business, where a high risk to processing of personal information is likely or has been identified.

Statement 17:

Employees and privacy

Employees receive training on privacy, information security and data protection. General awareness training is performed for all employees at least annually. General awareness training is also provided to all employees at induction upon joining Smart Life and EasyPay Insurance. More detailed training is provided to specific employees aligned with their specific roles and responsibilities related to privacy and data protection. Letters of appointment include appropriate privacy, confidentiality and data protection clauses.

Statement 18:

Third-party management

Third parties may undergo risk assessments and further due diligence requirements dependent on the services that they are to provide to Smart Life and EasyPay Insurance, the types, sensitivity and volumes of personal information to be processed by the third party (if any), and the risk and potential impact posed to any Data Subjects by such processing. Standard contractual agreements for all third parties will include privacy, data protection, information security and data handling clauses.

Statement 19:

Information Officers

The Information Regulator appointed Simon Hebron as the **Information Officer** on 20 July 2021.

Statement 20:

Information Regulator

The Data Subject may, at any time, lodge a complaint as outlined in the Smart Life and EasyPay Insurance Complaints Management Framework with the information Regulator at:

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| Postal address: | P.O. Box 31533, Braamfontein, Johannesburg, 2017 |
| Telephone: | +27 10 023 5200 |
| E-mail address: | enquiries@info regulator.org.za |
| Website: | www.info regulator.org.za |

Statement 21:

Review

This Policy is to be reviewed on a regular basis, but no later than 36 months after completion of the previous review. The process of review is led by the Head of the Compliance Control Function who may be assisted by the Head of the Risk Management | Control Function. The Board of Directors must approve the revised review.



Easy Pay Insurance products are underwritten by The Smart Life Insurance Company Limited, a licensed life insurer and an authorised financial services provider (FSP45983)