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## Privacy Policy

as prescribed by the provisions of the Protection of Personal Information Act, 2013

July 2022

### 1. Introduction

- 1.1. FSP Solutions as well as FSP Commercial On-Line (referred to as 'we', 'us' and 'our') care about the privacy, security, and online safety of our customers' (referred to as 'you' and 'your') personal information. We take our responsibility to protect your Personal Information very seriously and as such we want to assure you that your information will be properly managed and protected at all times.
- 1.2. This Privacy Policy explains how we collect, use, share and protect your Personal Information, as required by the Protection of Personal Information Act (POPIA). Using our services and any disagreements about your privacy are subject to this notice.
- 1.3. As our business grows and changes, we may need to update this Privacy Policy to reflect those changes. We reserve the right to amend this Privacy Policy from time to time, and you agree that you will review the terms of this Privacy Policy whenever you visit our website for any such amendments.

- 1.4. This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of the Republic of South Africa.
- 1.5. When you visit our website, and in the process provide us with your Personal Information, you will be agreeing to the provisions set out below. You also authorise us to act on the information that you send electronically.
- 1.6. Please ensure that you have read and understood the terms and conditions of this Privacy Policy before you provide us with your Personal Information.

## 2. The meaning of processing your Personal Information

To help you understand this Privacy Policy, we include the explanations of the terms 'Personal Information' and 'Process' as used in POPIA:

- 2.1. Personal Information and Special Personal Information is any information relating to an identifiable living or juristic person. Such as: race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and criminal or employment history.
- 2.2. Process means any operation or activity, whether automated or not, concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating or modifying, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information. "Processing" will have a similar meaning.

### 3. Why we process your Personal Information

- 3.1. We must process your Personal Information to provide you with our products and services, and as required by insurance, tax and other legislation. For example, when you utilise our services or online platforms, we collect your name, contact information and payment information to complete the transaction.
- 3.2. Your personal information is also gathered through our website and other channels we use to distribute, communicate, and deliver our services. We use your Personal Information to do the following:
  - 3.2.1. identify you;
  - 3.2.2. process your requests or instructions;
  - 3.2.3. manage your policy;
  - 3.2.4. follow the laws of South Africa;
  - 3.2.5. detect and prevent fraud;
  - 3.2.6. offer other products and services to you.
- 3.3. Due to the nature of our business, we sometimes use other parties like our service providers, administrators, credit organisations, other insurance brokers or agents, insurance companies, and financial institutions who in turn process your Personal Information.

### 4. Disclosure of your Personal Information

- 4.1. In order to provide our products and services to you, we may share your Personal Information with other insurers, industry bodies, credit agencies and our service providers. These are some examples of when we will share your Personal Information:

- 4.1.1. When required by any regulatory authority, such as the Financial Sector Conduct Authority (FSCA);
  - 4.1.2. When required by legislation or any legal process;
  - 4.1.3. To protect and defend our rights and property, including our intellectual property;
  - 4.1.4. When you have given us direct permission to do so.
- 4.2. We will never sell or share your Personal Information with other parties for their own marketing use, unless, you have given us explicit consent.

## 5. Information that is automatically collected

- 5.1. When you use our website, we receive, and store information generated by your activities (usage data gathered by cookies) and other information that is automatically collected from your browser or mobile device.
- 5.2. Most of this data is generally not personally identifiable. However, some of this data, either alone or when linked with other information, may allow your identity to be discovered. We treat this combined data as Personal Information, and we protect it accordingly.
- 5.3. Cookies are small textiles that are created when you view a website. They gather usage data which includes information about the sites you visited, the number of times you visit, the date, time, and length of your visit, which products or services you viewed and which areas of the site you visited. We may assign you one or more unique identifiers to help keep track of your future visits.
- 5.4. Other information automatically collected may include your IP (Internet protocol) address, browser version, preferred language, geographic location, wireless or Bluetooth technology on your device, operating system, and computer platform.

## 6. How we protect your data

- 6.1. We take every reasonable precaution to protect your Personal Information (including information about your activities) from theft, unauthorised access, and disruption of services.
- 6.2. Our security controls are designed to an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centres, systems, and other assets for security vulnerabilities. However, we cannot guarantee the security of any personal information that you willingly disclose online.
- 6.3. Please note that we process and collect your Personal Information when you use our website, contact us electronically or complete a quotation or application form online.
- 6.4. We will not collect, use or disclose your Personal Information for any purpose other than those that we identify to you. We will maintain your Personal Information as accurate, complete, and up to date as possible.
- 6.5. We will only keep your Personal Information for as long as we need it to fulfil the stated purpose or as required by law.

## 7. Receiving marketing information from us

- 7.1. We like to keep our customers informed of the latest products and services offered by us and our service providers. When you buy a new product or service from us, we will ask you what your marketing preferences are.
- 7.2. If you do not want to receive marketing information from us, you can change your preference by contacting us on the contact details below. Note that even if you choose not to receive marketing information from us, we may still communicate with you regarding

matters such as security updates, product functionality, responses to service requests and for other transactional or administrative purposes.

## 8. Accessing, changing, or removing your Personal Information

You may ask us to access, change or remove your Personal Information from our records.

## 9. Information Officer details

9.1 For any questions related to this policy or any processing of Personal Information in general, you can contact our appointed Information Officer and Deputy Information Officer.

9.2 The contact details of the Information Officer and Deputy Information Officer are as follows:

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|----------------------|--|
| Information Officer: | Lucas Bothma   |
| Physical address:    | 1403 Starkey Avenue, Waverley, Pretoria, South Africa            |
| Postal address:      | P.O. Box 50030, Randjesfontein, 1683                             |
| Telephone number:    | +27 10 001 2602 or +27 82 498 5544                               |
| E-mail address:      | <a href="mailto:lucas@fspolutions.com">lucas@fspolutions.com</a> |

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|-----------------------------|--|
| Deputy Information Officer: | Retha Botha  |
| Physical address:           | 9 Syringa Avenue, Breunanda, Roodepoort                          |
| Postal address:             | P.O. Box 50030, Randjesfontein, 1683                             |
| Telephone number:           | +27 10 001 2602 or +27 82 379 0321                               |
| E-mail address:             | <a href="mailto:retha@fspolutions.com">retha@fspolutions.com</a> |