

| 2024 |

Stratum Benefits<sup>+</sup>



## PROTECTION OF PERSONAL INFORMATION (POPI) POLICY

**GUARDRISK**  
TAILORED RISK SOLUTIONS

Stratum Benefits (Pty) Ltd, an authorised FSP 2111, is underwritten by Guardrisk Insurance Company Limited, a licensed non-life insurer and authorised FSP 75. Health insurance is administered by Unity Health, a division of Ambledown Financial Services (Pty) Ltd, FSP (10287). Underwritten by Bryte Insurance Company Limited, a licensed insurer & authorised FSP (17703). Terms and conditions apply.

**Bryte**

Stratum Benefits<sup>+</sup>

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086 633 3761

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**UNITYHEALTH**

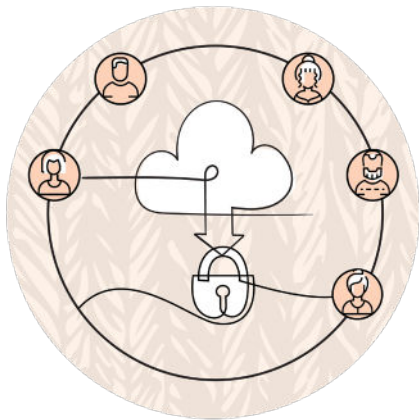
www.stratumbenefits.co.za

## PERSONAL INFORMATION

The Protection of Personal Information Act, 2013 ("POPI") came into complete commencement on 1 July 2021. In this regard, we have several obligations and duties regarding POPI that we must comply with. Protecting your personal information is a high priority for us, and we've taken steps to ensure that your personal information is protected and remains private. To explain how we collect, use, and protect personal information, we've developed this privacy policy, which also serves as our data subject notification as contemplated in Section 18 of POPI. This document will inform you of what personal information we collect, why we collect it, how we use it and what safety measures are in place to protect it.

"Process" means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. Generally, we'll only process your personal information if required to deliver or offer a service, provide a product, or carry out a transaction. We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

Personal information is any combination of information in possession of or is likely to come into our control that can be used to identify, contact, or locate a discrete individual ("Personal Information") and will be treated by this Privacy Policy. The personal and unique personal information we process includes personal information defined under Section 1 of POPI. This also includes any expression of opinion about such an individual. Any information that can't be used to identify a discrete individual, like aggregated statistical information, isn't personal.



## SUPPLY OF PERSONAL INFORMATION

The supply of certain personal information is mandatory, meaning we must collect this personal information from you by law. If you don't supply this information, we won't be able to comply with our legal obligations. In this regard, we cannot do business with you if you don't provide this personal information. We collect personal information as required by the following legislation:

- Basic Conditions of Employment Act, No 75 of 1997
- Continuing Education and Training Act (previously known as Further Education and Training Colleges Act) 16 of 2006
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Credit Agreement Act, No. 75 of 1980
- The Criminal Procedure Act, No. 51 of 1977
- Debt Collectors Act, No. 114 of 1998
- Employment Equity Act, No. 55 of 1998
- Financial Intelligence Centre Act, No. 38 of 2001
- Financial Advisory and Intermediary Service Act, No. 37 of 2002
- Higher Education Act 101 of 1997
- Income Tax Act 58 of 1962
- Labour Relations Act, No 66 of 1995
- National Credit Act, No. 34 of 2005
- NQF Act No 67 of 2008

- Occupational Health and Safety Act No. 85 of 1993
- Pension Funds Act, No. 24 of 1956
- Prevention of Organised Crime Act No. 121 of 1998
- Skills Development Act 97 of 1998
- Unemployment Insurance Act, No. 63 of 2001

In other instances, the supply of personal information is voluntary, which means no law is imposed on us to collect this personal information.

Even though no law imposes the collection of personal information, we require personal information to deliver the products and services to you. In this regard, we can't do business with you without your personal information.

## UNIQUE PERSONAL INFORMATION

We may process your unique personal information in the following circumstances:

- if you have consented to the processing.
- if the information is used for any human resource or payroll requirement.
- if the processing is needed to create, use, or protect a legal right or obligation.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the unique personal information was made public by you.
- if the processing is required by law.
- if racial information is processed to identify you, and health information is processed to determine your insurance risk, comply with an insurance policy, or enforce an insurance right or obligation.

## When and from where do we obtain personal information about you?

We may collect personal information about you from the following sources:

- directly from you.
- a public record.
- an area where you have deliberately made it public.
- your use of our products, services, or service channels.
- how you engage or interact with us via our support desk, emails, letters, telephone calls and surveys.
- a third party.
- another source if you give us consent to do so.
- website usage information is collected using "cookies" that allow us to collect standard internet visitor usage information. Personal information that an individual submits is used only for the purpose that it was intended for. Copies of correspondence containing personal information are archived for record-keeping and backup purposes only.

Without your consent, we won't share information with any third party for any purposes whatsoever.

If the law requires us to do so, we'll ask for your consent before collecting personal information about you from third parties. The third parties from whom we may collect your personal information include, but are not limited to, the following:

- partners of our company for any purposes identified in this Privacy Policy.
- your spouse, dependants, partners, employer, and other similar sources.
- attorneys, tracing agents, debt collectors and other persons that assist with enforcing agreements.
- payment processing services providers, merchants, banks, and other persons.
- insurers, financial advisors, other financial institutions, or other organisations that assist with insurance and assurance underwriting, providing insurance and assurance policies and products, assessing insurance and assurance claims and other related purposes.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.

- regulatory authorities, industry ombudsman, governmental departments, and local and international tax authorities.
- trustees, executors or curators appointed by a court of law.
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
- courts of law or tribunals.

## USE OF INFORMATION

We'll only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented to it.
- if a person legally authorised by you, the law, or a court, has consented.
- if it's necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.
- if it's required to protect or pursue your, our or a third party's legitimate interest.

### Reasons we need to process your personal information:

We need to collect personal information, unique personal information or other information for:

- underwriting purposes;
- assessing and processing claims;
- informing you of our services;
- ensuring that our business suits your needs;
- to market our products, goods, and services to you;
- to respond to enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements;
- to conduct market and behavioural research, including scoring and analysis, to determine if you qualify for products and services or to assess your credit or insurance risk;
- for historical, statistical and research purposes, like market segmentation;
- to process payment instruments;
- for security, identity verification, and to check the accuracy of your personal information;
- to provide insurance and assurance policies and products and related services;
- to assess our lending and insurance risks; and
- for any other related purposes.

### How we use your personal information for marketing:

- We'll use your personal information for our products and services.
- We'll do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- If you're not our client, or in any other instances where the law requires, we'll only market to you by electronic communications with your consent.
- In all cases, you can request us to stop sending marketing communications to you at any time.

## SECURITY

We strive to ensure the security, integrity and privacy of any personal information submitted. We'll review and update security measures with future legislation and technological advances. Unfortunately, no data transmission over the internet can be guaranteed to be secure. However, we'll endeavour to take all reasonable steps to protect the personal information that you submit. We may engage with other organisations to support our business as a Financial Services Provider (FSP). Third parties are obligated to respect the confidentiality of our personal information. Service level agreements and non-disclosure declarations are in place with all third parties to ensure adherence to privacy policies.

Our employees must respect the confidentiality of any personal information they hold. All employees must sign an employment contract with a confidentiality clause. We won't reveal any personal information to anyone unless:

- we're compelled to comply with legal and regulatory requirements or when it's otherwise allowed by law;
- it's in the public's interest; and
- we need to do so to protect our rights.

We'll endeavour to take all reasonable steps to keep any information we hold about you secure and to keep this information accurate and up to date. If you discover that the information we've gathered about you is incorrect, please get in touch with us to have it corrected.

We recognise the importance of protecting the privacy of information collected about you, particularly information that could be used to identify you.

## CONTACT US

Any questions relating to our Privacy Policy or the treatment of your personal data may be addressed to:

Yolanda de Klerk | Information Officer  
 e yolanda.deklerk@stratumbenefits.co.za

## HEAD OFFICE

### STRATUM BENEFITS (PTY) LTD

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 Suite 386, Private Bag X09, Weltevredenpark, 1715  
 Reg no: 2003/018155/07

## INFORMATION REGULATOR CONTACT DETAILS

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We'll address your complaint as far as possible.

e POPIAComplaints@infoeregulator.org.za / Complaints.IR@justice.gov.za  
 p P.O. Box 31533, Braamfontein, Johannesburg, 2017  
 t 010 023 5200 / 010 023 5207  
 a JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

For further enquiries with the Information Regulator on POPIA, please email enquiries@infoeregulator.org.za.

## CHANGES TO THIS NOTICE

We may amend this Privacy Policy from time to time. Please continuously check our website for any updates.

We'll at all times set the highest standards to ensure the integrity of our systems.

