Privacy Statement

This privacy notice sets out how I Manage Risk uses, discloses and protects any personal information that you provide or that we collect, when you use our website or that we collect directly from you.

We collect personal information to be able to provide you with adequate insurance cover based on your risk profile and to ensure that we have the correct and most up to date information.

"Personal Information" means information relating to an identifiable, living, natural person and where applicable, an identifiable, existing juristic person.

This privacy statement describes how we handle Personal Information that we collect from you through proposal forms, claim forms, telephone calls, emails and other communications with us, as well as from third parties involved in our business dealings with you.

We are committed to ensuring that your personal information is protected. If we ask you to provide certain information by which you can be identified it will only be used in accordance with this privacy statement. If you do not wish to provide personal information to us then you do not have to do so, but it may affect the products and services offered and our ability to provide them.

I Manage Risk recognises the importance of protecting your personal information and as such subscribes to the principles, outlined in an applicable privacy that governs your right to having your personal information kept private.

Collection of personal information

Personal information will be collected directly from yourself, the data subject, except if:

- Your personal information is contained in a public record or has deliberately been made public by yourself,
- You have consented to the collection of the information from another source,
- The collection of the information from another source would not prejudice your legitimate interest,
- Where the collection of the information from another source is necessary
 - to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - to enforce a law imposing a pecuniary penalty;
 - to enforce legislation concerning the collection of revenue as defined in local tax legislation;
 - for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
 - \circ ~ in the legitimate interests of national security; or
 - to maintain the legitimate interests of the responsible party or of a third party to whom the information is supplied;
- Compliance would prejudice a lawful purpose of the collection, or
- Compliance is not reasonably practicable in the circumstances of the particular case.

Depending on your relationship with us Personal Information collected about you may include:

- Your name,
- Address,
- ID/passport numbers,
- Email and telephone details,
- Gender,
- Marital status,
- Family status,

- Date of birth,
- Registration numbers,
- Educational background,
- Activity records, such as driving records,
- Photos,
- Employment history, skills and experience,
- Current or former physical or mental or medical condition,
- Professional licenses and affiliations,
- Financial information and banking details such as account numbers,
- Relationship to the policyholder, insured or claimant, and
- Date and cause of death, injury or disability.

In certain cases, we may receive sensitive information about your trade union membership, religious beliefs, political opinions, family medical history or genetic information. In addition, we may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud, reporting to the regulators and assisting in their surveillance and enforcement responsibilities. We may also obtain sensitive information if you voluntarily provide it to us.

How we use your personal information

We may use your Personal Information to:

- Communicate with you and others as part of our business,
- Send you important information regarding changes to our policies, other terms and conditions and other administrative information,
- Make decisions about whether to provide insurance and assistance services; including claim assessment, processing and settlement and, where applicable, manage claim disputes,
- Assess your eligibility for payment plans, and process your premium and other payments,
- Provide improved quality, training and security,
- Prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks,
- Carry out market research and analysis, including satisfaction surveys,
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed,
- Personalise your experience on our website by presenting information and advertisements tailored to you,
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management,
- Resolve complaints, and handle requests for data access or correction,
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence),
- Establish and defend legal rights; protect our operations or insurance business partners, our rights, privacy, safety or property, and/or that of you or others; and pursue available remedies or limit our damages.

Sharing your personal information

I Manage Risk does not and will not sell or provide your personal information to third parties for independent use. We may, however, share your personal information with our business partners if that information is required to provide the product or service you have requested. However, our business partners will adhere to using your information only as directed by I Manage Risk.

The following list includes but is not limited to some of the instances when we disclose the personal information obtained from you:

- When any regulatory authority for the various financial sectors requests same;
- To comply with any regulation passed under relevant legislation, or any legal process;
- To enforce and protect our rights and property (including intellectual property) and/or where we have a legitimate interest to do so;
- When you have expressly authorised us to do so; or
- If we undergo a change in ownership.

I Manage Risk may make Personal Information available to:

• Our service providers

External third-party service providers, such as accountants, auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

- Governmental authorities and third parties involved in court action
 I Manage Risk may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, you or others; and (g) to allow us to pursue available remedies or limit our damages.
- Other Third Parties

We may share Personal Information with payees, emergency providers (fire, police and medical emergency services), retailers, medical networks, organisations and providers, travel carriers, credit bureaus, credit reporting agencies, and other people involved in an incident that is the subject of a claim, as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock. To check information provided, and to detect and prevent fraudulent claims, Personal Information (including details of injuries) may be put on registers of claims and shared with other insurers. We may search these registers when dealing with claims to detect, prevent and investigate fraud.

Transferring of your personal information internationally

Due to the nature of our business, for the purposes set out above we may transfer Personal Information to parties located in other countries. We may transfer information internationally to our service providers.

Protecting your personal information

To help protect the privacy of data and personal information you transmit through use of our services, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personally identifiable information to those employees who need to know that information to provide services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

I Manage Risk will take appropriate technical, physical, legal and organisational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us. (See the *"Who to Contact About Your Personal Information"* section below.)

When I Manage Risk provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

Retention of your personal information

I Manage Risk takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this privacy notice. I Manage Risk will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

COOKIES AND WEB BEACONS

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, email response and tracking.

Our website does not use cookies and web beacons. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser.

Inapplicability of Privacy Statements of Any Linked Sites or Other Third Parties

This Privacy Statement only addresses I Manage Risk's use and disclosure of your personally identifiable information. As our website may contain links to other websites, please be aware that we are not responsible for the privacy practices of such other sites, and we are not liable for their misuse of personally identifiable information. We encourage you to be aware that when you go to another website you should carefully read their Privacy Statement.

General Legal Notice and Disclaimer

Access to the information contained on our website is provided by I Manage Risk to its clients and non-clients as a service to financial services providers. I Manage Risk, including its employees and agents, is not responsible for, and expressly disclaims all liability for, damages of any kind arising out of use, reference to or reliance on the information available through our website or any other means. No approvals, recommendations, endorsements, guarantees or warranties, including, but not limited to, any express or implied warranties of merchantability or fitness for any particular use or purpose of products or services named on this Site are made by I Manage Risk.

Your Access to and Updating of Personal Information

Reasonable access to personally identifiable information will be provided within 30 days at no cost to I Manage Risk customers and others upon request made to I Manage Risk at the contact information provided below. If access cannot be provided within that time frame, I Manage Risk will provide the requesting party a date when the information will be provided. If for some reason access is denied, I Manage Risk will provide an explanation as to why access has been denied.

Notices and Changes to Our Privacy Statement

By using our services and website, you agree to the terms and conditions contained in this Privacy Statement and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use our website, or any I Manage Risk benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Statement any other agreement we have with you, will be governed by the laws of South Africa. You also agree to arbitrate such disputes in South Africa, and to abide by any limitation on damages contained in any agreement we may have with you.

As our organisation changes from time to time, this Privacy Statement is expected to change as well. We reserve the right to amend the Privacy Statement at any time, for any reason, without notice to you, other than the posting of the amended Privacy on our website. You should check our site frequently to see the current Privacy Statement that are in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of our services and website.

Questions Regarding the Privacy Statement and Conditions of Use

If you have any questions about our Privacy Statement and Conditions of Use, or any concern about privacy at I Manage Risk or the use of our website in general, please contact us by email at <u>info@imrisk.co.za</u>.

This policy is effective from 30 July 2023.