

**Directors**

WJ Griessel (HCII)

F Horn (MA)

C Bester (BComm)

R Barnard (HCII)

Registration no. 2021/360807/07**VAT no.** 4550295200**FSP no.** 51584

POPIA MANUAL

ProVérte Risk Management

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POPIA COMPLIANCE POLICY
ProVérte Risk Management (Pty) Ltd

Registration Number: 2021/360807/07

Physical Address: Office OF03, Groundfloor
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Contact Number: 021 872 0765

Email Address: lee-ann@proverte.co.za

Head of Organisation: Willem Jacobus Griessel

Identity Number: 7004045038085

Information Officer: Willem Jacobus Griessel

Identity Number: 7004045038085

Contact Number: 083 701 0343

Email Address: willie@proverte.co.za

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1. Introduction and Overview

The Protection of Personal Information Act 4 of 2013 ("POPIA") is South Africa's Data protection law. It was created to give effect to the Constitutional right to privacy and protect the use of private information.

At ProVérte, we aim to add value to our client's lives in the area of short-term insurance planning. In so doing we take our responsibility in protecting our client's, employees and related stakeholders' information seriously and have set out the measures we have taken to comply with the requirements of POPIA in this Privacy Policy.

We have taken every measure as can be reasonably expected, having due consideration for the nature and scope of the personal information collected, the use thereof, the storage thereof and the destruction thereof as well as the required industry specific legislation, entities, committees and standards to ensure compliance with the requirements of POPIA both as Responsible Party and Operator and to ensure our agreements with third parties pass muster.

1.1 About the Company

ProVérte Risk Management (Pty) Ltd

We assist our clients with their short-term insurance needs.

For more information, please visit our website at www.proverte.co.za

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1.2 The Information We Collect

The information we collect from our clients is aimed at giving tailor made and sound advice, based on their short-term insurance needs. As far as possible we will collect this information directly from our client or obtain permission from the client to collect information from reliable and verified third parties.

We limit the information we collect to ensuring we are able to fulfil our contractual obligations to our clients, or otherwise further their legitimate interest based on a specific mandate by the client.

The data we collect, including sensitive data may include the following, based on the client's specific needs:

- Name and Identity Number
- Residential, Physical and Postal Address
- Telephone, cellular phone, email address and related contact details
- Race, language, gender/sex and nationality
- Educational, financial, criminal and employment history
- Defective vision or hearing, physical or mental health
- Banking Details

1.3 Roles and Responsibilities

In complying with POPIA, we act as the Responsible party and as well as the Process of the data provided. In processing the data as provided we may make use of third parties, subcontractors, service providers or similar entities which also include marketing agents.

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We have reviewed our relationships with these third parties and the contracts in place and have satisfied ourselves that these entities have taken the necessary steps to ensure they are also compliant with the provisions of POPIA and are only provided such information as is necessary in the performance of their service to us.

2. Privacy Principles

In as far as possible, we have assessed our systems and structures in place and are satisfied that we have taken every reasonable precaution to ensure that we adhere to the Privacy Principles set out in POPIA in the collection, processing, storage and deletion of the data we collect.

2.1 Choice and Consent

All data is collected directly from the client, and where any information is to be verified or objectively determined, informed consent is obtained from the client for the collection of this data.

We may contact our existing clients electronically with new or client related marketing materials based on the client's preferences, and only if the client has engaged with us for advice or services in the past.

Should the client no longer wish to receive any marketing or related product information or marketing material, they are afforded the option to cancel any and all such communication.

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We will not market or otherwise communicate with the client in this way without the client's direct consent and will limit any such marketing based on the client's consent thereto, which consent can and may be withdrawn at any time without question.

2.2 Storage, Process and Destruction

All client information is stored and processed on our systems for the duration of our relationship with the client.

Should our relationship with a data subject end, we keep any physical or electronic information for a period of up to 5 years, depending on our legislative or other similar obligation, unless the data subject provides an express mandate not to store or otherwise keep the information.

Data is collected and processed generally to fulfil our contractual obligations, or otherwise advance a legitimate interest on behalf of our clients, based on their mandate, more specifically to, or for the purpose of (including but not limited to) providing an accurate quotation, calculate a product premium and provide financial and product specific advice.

2.3 Accountability and Security

We process client information based on the "System", being a business / practice administration tool licensed and owned by HubIT (Pty) Ltd. Our personnel have been properly trained to use this "System" to collect, process and store information with the necessary security and user passwords in place aimed at protecting access as well as the integrity of the data collected. We have the necessary service level agreement in place with HubIT and can confirm with confidence that it meets the requirements of POPIA.

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Our internet and electronic systems are protected by both a Microsoft Windows 10 Firewall, as well as a Kaspersky antivirus and Firewall System. Kaspersky is recognized as one of the leading Firewall and Antivirus programs globally and we are satisfied that it provides adequate protection against electronic and related outsider e- and cyber-crimes.

2.4 Access

Client data is confidential and is treated accordingly. Unless a client has specifically consented thereto, data is not provided to third parties, unless required or requested in terms of law or legislation.

Our advisors and staff have access to data, based on the nature and scope of their employment, and access to such information is limited to the service being provided.

A client is at all times entitled to their personal data on request. We provide an annual statement setting out the details we have available for the client and provide the means of ensuring that this data is kept up to date. Should any information need to be amended and updated, notification of such amendment is to be done in writing.

2.5 Information Request

Should a third party request data held by or on behalf of a client or other data subject, such request shall be set out in writing and confirm the details as provided for in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA), which request will be communicated directly to the data subject, who shall have absolute discretion, save as otherwise provided by law, to grant or refuse access to such data.

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3. Physical Access

Physical documents and records containing data are stored in a business classified system and are secured in locked filing cabinets / cupboards and locked offices.

Most of our branches make use of an external security company providing an armed response in the event of a break in or incident. Our Worcester branch is situated in a shopping centre with 24-hour security guards.

Electronic information is stored on laptops and cell phones, with access protected by passwords and related access control. This information is further secured and backed up using Microsoft OneDrive to Microsoft DropSuit Cloud Storage which is also account user and password protected.

4. Staff and Employees

We acknowledge our responsibility towards our employees, and the protection of their personal data, which includes sensitive personal data and where applicable data related to their children. This information is collected, processed, stored and deleted in terms of our obligations in terms of our contractual as well as legislative obligations, and include, but not limited to:

- Group Life and Retirement Annuity
- Income Tax Numbers
- Proof of banking details
- Curriculum Vitae and related supporting documentation, including identity documents; academic credentials; certificates; driver's license, etc.
- Employment contracts, and related annexures
- Termination of employment and certificates of service.

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Due to the nature of the services offered, staff members are only granted access to such personal data as is necessary for the fulfilment of his or her duties, mandate or related responsibilities. Access by staff to the relevant data is protected by usernames and passwords related to the “System” as mentioned, as well as access to hardware such as laptops and cell phones.

Included in our employment contracts are confidentiality clauses aimed at ensuring accountability and ethical conduct specific to our industry, as well as personal accountability for the safety and security of the data under each employee’s control, and in accordance with his or her position.

Sub-contractors, third parties or other entities with whom we do business and with whom we share data are required to ensure that they have the necessary privacy policies and security measures in place.

5. Destruction of Personal Data

5.1 Paper Records

We aim for a paperless environment as far as possible. Should we have to print any documents, they are stored and when no longer needed are shredded and effectively destroyed without the possibility of being reproduced. Any documents not needed for storage are shredded immediately.

5.2 Laptops and Other Mobile Storage Devices

Data captured and stored electronically is deleted manually on termination of our relationship with a data subject but is stored as a “deleted file” on our systems. OneDrive permanently deletes all deleted data after 30 days of deletion, thus ensuring it cannot be reproduced, or otherwise accessed by unauthorized persons.

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6. Monitoring

As mentioned, The System as contracted with HubIT, is aimed at secure capturing, archiving and access to personal data, in accordance with the necessary Information Security Management.

Access to the system is monitored, and our employees are granted user specific access by use of usernames and passwords, and users can only access their assigned profiles.

The system further monitors who upload information, and how and when the data is accessed throughout the relationship with the client by providing the username as well as the date on which information was accessed.

We further subscribe to good insurance practices and are accountable to various authorities in terms of legislation with regards to our audit trials.

Access to physical data is monitored by each staff member, and each of them is responsible for ensuring the safety and integrity of the data under their control.

7. Reports and Incidents

In the event of physical security breach, we will be informed immediately through our armed response teams that a branch has been entered, and we will immediately conduct an assessment to determine the extent of the breach. Should any physical files or documents be missing, the owners of that data will be contacted, so as to make the necessary arrangements to limit the effect of such data breach.

Should any electronic hardware, such as laptops, be stolen, these are access control password protected, and access to the systems or information stored is also password and username protected.

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8. Emailing and Electronic Marketing

We make use of a marketing consultant known as “Succeed Media (Pty) Ltd t/a: Succeed Group” (“Succeed”) for our bulk email and marketing needs. All emails are sent through an automated system to succeed to add details such as our signatures.

We are thus confident that should any of our hardware be stolen, the information contained will still be protected from unauthorized access.

Any data breach will be reported to the Regulator by the Responsible party.

Succeed is required to and does subscribe to secure and GDPR and POPIA compliant bulk emailing applications, and we have ensured that they always include an “opt out” mechanism for any and all marketing and related communications.

We provide Succeed with details of our client’s and their mailing lists for the purpose of electronic marketing. These lists are regularly reviewed to ensure receipt of our marketing and bulk email material is done with prior consent, with clients with whom we already have a working relationship and may benefit from further or additional information and provide an option to either opt in, or out of receiving further correspondence.

We have satisfied ourselves that Succeed makes use of appropriately secured data centres to protect the integrity and security of the data collected and transmitted.

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Our website and on-line platforms such as Facebook and LinkedIn are secured against unlawful or unauthorized access, and we have the necessary Cookie Policy in place to ensure that users are aware of the data we collect. Content on these sites, as well as interaction with any data subject is strictly in terms of this privacy policy.

9. Data Transmissions

We acknowledge that we live in a global economy where data itself has no bounds. The various laws protecting the transfer of data internationally (such as GDPR in the European Union, and POPIA in South Africa) confirm that this may only be done under certain circumstances.

We have taken every precaution in ensuring that personal data is not transferred to a person in another country:

- Without express consent of the data subject, or if the data subject is a child, with the express consent of that child's parent or guardian as applicable.
- Without express consent of the data subject, or if the data subject is a child, with the express consent of that child's parent or guardian as applicable.
- Or when the recipient is bound by certain laws rules or binding agreements that provide adequate data protection.

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10. Conclusion

We are satisfied that we have taken every possible precaution as can reasonably be expected of us, taking into account industry norms and standards, in ensuring that we have met the necessary legislative as well as contractual obligations to our clients, employees and third parties with or on behalf of whom we conduct or provide our services and advice.

We are further satisfied that all reasonable and technical organizational measures are in place by our subcontractors, third parties and related entities to ensure that they too comply with the necessary requirements.

This privacy policy will be reviewed from time to time and updated as is required, and as we bring about any new and improved measures of securing personal data.

Signed at PAARL on the 9th of February 2026.

LEE-ANN VAN ROOYEN

COMPLIANCE / OPERATIONAL MANAGER

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