

Amadwala Group Privacy Policy

This Privacy Notice describes how the Amadwala Group collects, uses, discloses, retains and protects the client's personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws.

The Privacy Notice applies to any website, application, form, document, product or service which references this Privacy Notice. It also supplements any other privacy policies which may apply in respect of Amadwala Group entities' processing of personal information. **Amadwala's privacy policy are not only limited to the regulations of POPIA, but are also regulated by Financial Advisory and Intermediary Services Act 37 of 2002(FAIS), Financial Intelligence Centre Act 38 of 2001 (FIC).**

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This includes, but is not limited to, the client's name, sex, gender, address, contact details, identity number and medical or health information.

Please note that this Privacy Notice may previously have been referred to on this website as a "privacy policy" or "privacy statement" and therefore some documents or forms may still refer to this Privacy Notice as a "privacy policy" or "privacy statement".

1. Who is Amadwala Group of Companies?

1.1. In this Privacy Notice, any reference to "Amadwala", "Amadwala Group of Companies" or "Amadwala Group" refers to one or more of the entities, affiliates or subsidiaries of the Amadwala Group of Companies operating in South Africa.

2. How information is collected?

2.1. Amadwala collect personal information about the client and any other person whose details the client provides to Amadwala in accordance with the relevant laws, either:

2.1.1. By way of the Letter of Authority the client gives consent to process personal information.

2.1.2. Directly from the client, as referred to the above, when the client completes a product or service application form, electronically, telephonically or by way of a hard copy;

2.1.3. Indirectly from the client when the client interacts with Amadwala electronically by way of Amadwala's website, apps, or social media channels, which may include the collection of metadata (data about data);

2.1.4. From retirement funds, medical schemes, insurance companies, employers and other contracted entities in the context of medical schemes and group insurance policies; and

2.1.5. where relevant, from third-party sources, such as other entities within the Amadwala Group of Companies, financial intermediaries that are representatives of Amadwala Group entities or have intermediary agreements with Amadwala Group entities, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies.

- 2.2. Amadwala will also collect the client's information where the client has only partially completed and/or abandoned any information which the client began to apply to Amadwala's website and/or other online forms. Given that Amadwala already consider the potential client a customer at this stage, Amadwala may use this information to contact the client in order to remind the client to complete outstanding information.
- 2.3. Where Amadwala require personal information in order to provide the client with Amadwala's products and services, the client's failure to provide Amadwala with the necessary information, will result in the Amadwala being unable to provide the client with Amadwala's products and services. Where such services include financial advice, the appropriateness of the advice may be compromised if the client do not provide complete and accurate information. The client is responsible for informing the Amadwala if the client's information changes.

3. Third Party Information Collection

- 3.1.** Owners or information system administrators of third-party websites that have links to the Amadwala website, may collect personal information about the client when the client use these links. Amadwala does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. Amadwala does not accept any responsibility or liability for third-party policies or the client's use of a third-party app, platform or service.
- 3.2.** Amadwala also uses certain social networking services such as, but not limited to Facebook, to communicate with the public and Amadwala clients. When the client communicates with Amadwala through these services, that social networking service may collect the client's personal information for its own purposes. These services may track the client's use of Amadwala's digital channels on those pages where the links are displayed. If the client is logged into those services (including any Google service) while using Amadwala's digital channels, their tracking will be associated with the client's profile with those service providers. These services have their own privacy policies which are independent of Amadwala's privacy policies and practices. The client needs to ensure that they fully acquaint themselves with the terms of any such third-party privacy policies and practices.
- 3.3.** Amadwala will only provide data to third-party information exchange services, for example, the Financial Services Exchange (Pty) Ltd, trading as Astute, with the client's consent.

4. What information is collected?

- 4.1. The client's relationship with Amadwala determines the exact nature of the personal information Amadwala processes, and the purpose for which such personal information is collected and used. However, in many cases, if Amadwala is handling the client's personal information as part of Amadwala's role as a service provider, the personal information Amadwala may process includes the following:
- 4.1.1. Information about the client – for example, the client's name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, current status of health, medical history and any existing conditions of each person insured (**Including beneficiaries**). In the event that the client submits a claim, Amadwala may also collect personal information from the client

about the claim and any relevant third parties. Amadwala acknowledge that information about the client's health is special personal information. Note that Amadwala will use that information strictly in accordance with applicable laws and for insurance purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).

- 4.1.2. Contact information – in some cases, for example, Amadwala may receive the client's email, address, phone number and postal address.
- 4.1.3. Online information – for example, cookies and IP address (the client's computer's internet address), if the client use Amadwala's websites, apps and/or social media channels.
- 4.1.4. Financial information – Amadwala may process information related to payments the client makes or receive in the context of an insurance policy or claim. Amadwala may process information regarding the client's income, expenses, assets, liabilities, investments, retirement and other financial provisions in the context of providing financial advice and intermediary services.
- 4.1.5. Contractual information – for example, details about the policies the client hold and with whom the client hold them.
- 4.1.6. Health information such as smoker status or medical-related issues relevant to a policy or a claim the client has submitted.

4.2. **Amadwala will need consent to process the client's personal information.** If the client gives Amadwala the client's consent for a specific context, the client is free to withdraw this consent at any time. Please note that where the client has withdrawn the client's consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of the client's personal information where consent is not required.

4.3. The client may refuse to provide Amadwala with the client's personal information in which case Amadwala may not be able to provide the client with a relevant service or would have to terminate Amadwala's business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

5. How personal information is used?

5.1. Amadwala have regulatory obligations, including compliance with anti-money laundering legislation, to process the client's personal information. This includes verifying the client's identity or the identity of the client's beneficial owner and/or controlling persons. Amadwala are also required by various laws to maintain a record of Amadwala's dealings with clients.

In order for Amadwala to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, Amadwala need to collect, use and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.

5.2. To the extent permissible under applicable laws, Amadwala may use the client's information:

- 5.2.1.** To provide the client with Amadwala's financial products and services, and maintain Amadwala's relationship with the client;
- 5.2.2.** To provide the client with financial advice and intermediary services;
- 5.2.3.** To conclude and administer the client's application, which may include underwriting;
- 5.2.4.** To execute a transaction in accordance with the client's request;
- 5.2.5.** To assess, check, and process claims;
- 5.2.6.** To meet Amadwala's contractual obligations with the client or take steps necessary for the conclusion of a contract with the client;
- 5.2.7.** In relation to administering any securities the client may hold in respect of a Amadwala Group entity (where relevant);
- 5.2.8.** **To comply with legislative and regulatory requirements, including codes of conduct and requirements of Amadwala's regulators (including the Financial Sector Conduct Authority (FSCA) and Prudential Authority (PA));**
- 5.2.9.** To undertake credit reference searches and/or verification;
- 5.2.10.** For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of Amadwala Group policies;
- 5.2.11.** For debt recovery or debt tracing;
- 5.2.12.** For purposes of online login and authorization (For example Retirement Fund Information etc.);
- 5.2.13.** To execute the Amadwala Group's strategic initiatives;
- 5.2.14.** To perform any risk analysis or for purposes of risk management to the client or Amadwala's business in general;
- 5.2.15.** To record and/or monitor and have access to the client's telephone calls (i.e., voice recordings), correspondence and electronic communications to/with Amadwala (or any of Amadwala's employees, agents or contractors) in order to accurately carry out the client's instructions and requests, to use as evidence and in the interests of crime prevention;
- 5.2.16.** To maintain the security of Amadwala's digital channels and systems;
- 5.2.17.** For statistical analysis and research purposes;
- 5.2.18.** For audit and record-keeping purposes;
- 5.2.19.** For purposes of proof and legal proceedings;
- 5.2.20.** To enhance the client's experience when interacting with the Amadwala Group and to help Amadwala improve Amadwala's offerings to the client;
- 5.2.21.** To share with other entities in the Amadwala Group, so that Amadwala can market Amadwala's financial products and services which Amadwala deem similar, with the aim of offering the client the opportunity to take up some of the financial products to fulfil the client's needs, provided that the client has not objected to receiving such marketing, as referred in Amadwala's disclosure document according to the FAIS act;
- 5.2.22.** To conduct market research and provide the client with information about Amadwala's products and services from time to time via email, telephone or other means (for example, invite the client to events);
- 5.2.23.** To process the client's marketing preferences (where the client have unsubscribed from certain direct marketing communications, keeping a record of the client's information and request to ensure that Amadwala do not send such direct marketing to the client again);

- 5.2.24.** To prevent or control the spread of any disease; and
- 5.2.25.** For any purpose related to and compatible with the above.

6. Sharing of Information

6.1. Entities within the Amadwala Group will only share the client's personal information with third parties if there is a legitimate reason to do so. Amadwala may disclose the personal information the client provides to Amadwala to the following entities:

- 6.1.1.** Amadwala's third-party service providers and other Amadwala Group entities who are involved in the delivery and/or administration of financial advice products and services;
- 6.1.2.** Other third parties in relation to the purposes set out under the previous section (How Amadwala use the client's information);
- 6.1.3.** Other insurers, public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention; and
- 6.1.4.** Reinsurers who provide reinsurance services to Amadwala and for each other. Reinsurers will use the client's personal information to decide whether to provide reinsurance cover, assess and deal with reinsurance claims, and to meet legal obligations.

6.2. Amadwala will process and share the client's personal information with other companies within the Amadwala Group for the purpose of facilitating the client's membership to a loyalty or rewards programme where applicable.

The client's personal information may also be shared with third-party suppliers from time to time for the purpose of facilitating and providing benefits to the client by way of a loyalty or rewards programme where applicable or when needed to fulfil Amadwala's contractual obligations to the client.

Amadwala will share information about the client with financial advisers that are Amadwala representatives or have intermediary agreements with Amadwala. Amadwala may also share information within the Amadwala Group where it is in Amadwala's legitimate interest to do so.

6.3. Amadwala will not sell, rent, or trade the client's personal information to any third party.

6.4. Amadwala will disclose information when lawfully required to do so:

- 6.4.1. To comply with any relevant legislation;
- 6.4.2. To comply with any legal process; and
- 6.4.3. By any regulatory authority (for example, the Financial Sector Conduct Authority or Prudential Authority).

6.5. On occasion, Amadwala may – for legitimate purposes – share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, Amadwala will not disclose the client's personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.

7. Information transferred across borders

7.1. Some of the persons to whom Amadwala disclose the client's personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, Amadwala may send the client's personal information to service providers outside of the RSA for storage or processing on Amadwala's behalf. However, Amadwala will not send the client's information to a country that does not have information protection legislation similar to that of the RSA, unless Amadwala have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

8. Storing of information and security thereof

8.1. Amadwala intends to protect the integrity and confidentiality of the client's personal information. Amadwala has implemented appropriate technical and organizational information security measures (including, but not limited to, using encryption for transmission of banking details and identity numbers) to keep the client's information secure, accurate, current, and complete. However, Amadwala cannot guarantee the security of any information the client transmits to Amadwala online and the client do so at the client's own risk.

8.2. Where third parties are required to process the client's personal information in relation to the purposes set out in this notice and for other lawful requirements, Amadwala ensure that they are contractually bound and are also regulated according to the POPIA, to apply the appropriate security practices. The client's personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

9. Right of access to information

9.1. The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. This right can be exercised in accordance with the **Amadwala PAIA manual**.

10. Correction or information from the client

10.1. In accordance with POPIA, the client has a right to correct any of the client's personal information held by Amadwala. This right should be exercised in accordance with the procedure outlined in the **Amadwala PAIA manual**.

11. Objection to processing of client information

11.1. In accordance with POPIA, the client may object to Amadwala's processing of the client's personal information on reasonable grounds relating to the client's particular situation, unless legislation provides for such processing.

12. Marketing

12.1. Where the client provides their personal information to a Amadwala Group entity in the context of a sale of one of Amadwala's products or services, the client agrees to such Amadwala Group entity sending them information on news, trends, services, events and promotions for Amadwala's own similar products and or services, always subject to the client's decision to opt in, of receiving such marketing at the time the client information is collected and on each subsequent marketing communication thereafter. If the client decides to opt-out, Amadwala Group of Companies will not send any information as set out above to the client till such time the client decides otherwise and gives consent.

12.2. The client may object to receiving direct marketing from Amadwala at any time by contacting the Amadwala on:

Telephone: **(013) 656 4444** or
Email: info@amadwalafa.co.za

Where the client chose to exercise their right to stop any direct marketing, please allow up to 21 days for Amadwala to effect that change.

13. Cookies

13.1. What is a cookie?

13.1.1. A cookie is a small text file that is downloaded onto 'terminal equipment' (for example, a computer or smartphone) when the client accesses a website. It allows the website to recognize the client's device and store some information about the client's preferences or past actions.

13.2. What cookies does Amadwala's use?

13.2.1. Some cookies which Amadwala use are essential to the functioning of Amadwala's website. Some cookies help Amadwala with the performance and design of Amadwala's website. This allows Amadwala to measure how many times a page has been visited, whether a page has been visited on the website through an advertisement or by other means. Other cookies help Amadwala to remember the client's settings which the client may have selected or assist with other functionality when the client browse and use Amadwala's website. This helps Amadwala to remember what the client have selected, so on the client's return visit – Amadwala remembers the client's preferences.

13.3. How do I disable cookies?

13.3.1. If the client does not want to receive a cookie from the website, the client has the option of setting the client's browser to notify the client when the client receives a cookie, so that the client may determine whether to accept it or not. However, please be aware that

if the client does turn off 'cookies' in the client's browser, the client may not be able to fully experience some of the features of the website.

14. Children

14.1. While few, if any, of Amadwala's websites are directed towards children as well as storage of information electronically and physically, Amadwala is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

14.2. Children's personal information will only be requested if necessary for legitimate reasons for the purpose of Amadwala's products and services.

15. Updates & Questions regarding this Policy

15.1. This privacy statement was last updated on 29 June 2021. Please request if the client choose to view Amadwala's Privacy Policy from admin1@amadwalafa.co.za. This is to ensure that the client is aware of the content as well as latest version of this Privacy Notice.

Questions, comments and requests regarding this statement may be directed to admin1@amadwalafa.co.za for clarification.

16. Information of Amadwala

16.1. Should the client have a complaint or concern regarding the processing of the client's personal information, the client's complaint has to be submitted to:

admin1@amadwalafa.co.za - (Compliance / Information Officer)

16.2. The Amadwala Group of Companies are licensed insurers and financial services providers.

16.3. Amadwala's head office's registered address is 7C Corridor Crescent, Route N4 Business Park, Emalahleni, Mpumalanga, South Africa, 1035.

For more information on the Amadwala Group, products & services Amadwala renders as well as Amadwala's Privacy Policy, please:

Amadwala's website : www.amadwalafa.co.za

Phone : 013 656 4444

Email : info@amadwalafa.co.za