

# Privacy Policy

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# THE UNLIMITED

**Last updated**

02 December 2025

**The Fine Print**

Your privacy is important to us at The Unlimited Group (Pty) Ltd ("The Unlimited"). We keep all personal information of our customers and potential customers confidential. We take our obligations very seriously and value the trust placed in us. The information obtained through the use of our website is treated as private and confidential, and we are committed to providing you with secure access to our online services.

**Our services**

We are a registered Financial Services Provider who offers insurance and non-insurance products and services, typically by means of direct marketing through various channels, including in-person interactions, over the telephone, on social media platforms and through our website (collectively referred to as "our Services").

In the course of providing our Services, we engage in direct marketing efforts both on our own behalf and on behalf of third-party service providers ("Service Providers"). This means that we may use your personal information to promote our offerings and the offerings of carefully selected partners and Service Providers, keeping in line with your preferences and applicable laws and regulations.

Our products, and those of our Service Providers, are typically products that are universally beneficial and cater to the legitimate interests of data subjects by providing essential cover and services that contribute to their well-being and protection. Examples of such products include medical insurance, and emergency services. Our Services also enable you to contract with these Service Providers.

**Who does this policy cover?**

This policy applies to external parties we interact with, including:

- users of our website;
- users and recipients of our Services;
- our potential and existing customers;
- our suppliers and contractors; and
- visitors to our offices.

It is important to note that this policy doesn't govern all the information we may process, and that it extends to individuals who may not currently be considered as our potential customers but could potentially become so in the future. We are committed to protecting the personal information of all individuals within our care, and this policy outlines our approach to safeguarding their privacy.

Our commitments to members are governed by our membership agreement, disclosure document and membership privacy notices, and this policy should be read together with such documents. If there is any conflict between your membership documents and this policy, the terms of the specific membership document will apply.

### What personal information do we collect and how do we collect it

We have to process some of your personal information in order to provide you with our products and Services, and also as required by insurance, tax and other legislation. For example: When you buy one of our Services or products, we collect your name, contact information and payment information directly from you to complete the transaction.

Examples of the types of personal information we collect include:

<b>Identifiers and contact information:</b>	Your identification number, name, address, phone number/s, and email address.	To verify your identity and age, to communicate with you effectively and ensure the accuracy of our records.
<b>Purchase or other commercial information:</b>	Information about the products you purchase.	Process your policy, activate products or services and provide customer support.
<b>Payment information:</b>	Payment method details, such as debit or credit card number.	We ensure the security and confidentiality of this information during payment processing.
<b>Communications and interactions</b>	Records of email messages, chat sessions, claim documents, application forms, text messages, direct messages, and phone calls exchanged between us.	Respond to enquiries, administer claims, issue products, provide customer support and to comply with our record-keeping obligations.
<b>Call recordings</b>	Information about your call and what you share when you call us or we call you on the phone.	We record phone calls to comply with our FAIS and POPIA obligations, for training, quality assurance, and dispute resolution purposes.
<b>Demographic information</b>	Information about your consumer status.	Helps us better understand our potential customer base and tailor offerings to specific demographics to ensure we market suitable products and services designed or intended to satisfy your needs or interests.

We, may, from time to time, collect and use your personal information directly from you or indirectly from other sources. These may include:

- live telephone calls and personal interactions;
- communicating with us through one of our official channels, including our SMS, email, WhatsApp and other instant messaging or communication platforms that you engage with us on;
- referrals from your friends or family, who have been contacted by The Unlimited;
- digital platforms such as websites, mobile applications, online forms, third-party sites displaying our advertisements, and social media platforms (including Facebook, Instagram, LinkedIn, TikTok, or any other online platform we use or approve);
- digital analytics, cookies, pixels, tracking technologies, automated data-collection tools, and information generated from your interactions with our digital properties or marketing campaigns;
- responses to online or social-media advertisements, landing pages, enquiry forms or campaigns requesting contact, quotes or further information;

- opt-in consent forms completed during face-to-face engagements, surveys or other in-person interactions;
- enriched, prequalified and opted-in leads provided by third party lead generation partners who are contracted with us and are lawfully permitted to share this information with us to respond to a solicitation request, and to complete customer acquisition and onboarding;
- where required to comply with our legal obligations, credit bureaus and verification agencies to ensure accuracy, completeness and quality of information; and
- publicly available sources including the Deeds Registry, CIPC and other public databases for verification purposes..

Your personal information is also gathered through other channels we use to distribute, communicate and deliver our Services. Where reasonably practicable, we will seek confirmation that the third party source has complied with applicable data protection laws.

## Why we use the personal information we collect

### Contract

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We process your personal information if it is necessary to enter or perform under a contract that we or a Service Provider have with you as a customer or supplier, or to provide a solution to you.

This includes to:

- identify you;
- process your requests, claims or instructions;
- manage your product or service (including disclosing information to underwriters, business partners and third-party service providers as the case may be);
- communicate with you about the product or service;
- ensure compliance with the terms of the agreements we have with you;
- transfer limited and necessary personal information to our service providers as required to perform our obligations to you; and
- achieve other related and lawful purposes.

### By law

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We process personal information to comply with our legal obligations under South African laws (including the Consumer Protection Act, Financial Intelligence Centre Act, Protection of Personal Information Act, Promotion of Access to Information Act, Financial Advisory and Intermediary Services Act, Policyholder Protection Rules and Tax Administration Act), and codes of conduct, for example to:

- verify your identity and age;
- fulfil reporting requirements and data subject access requests;
- conduct anti-money laundering and counter-terrorist financing checks;
- ensure the accuracy and completeness of your personal information; and
- meet our regulatory and record-keeping obligations.

## Legitimate interests

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We process personal information when it is necessary to pursue your legitimate interests, the interests of Service Providers, or our legitimate interests. This includes to:

- answer any requests or questions you might have;
- provide you with information about the things we create or do;
- to conduct market and behavioural research, including segmentation and affordability assessments to determine if you qualify for product offerings or to assess your credit or insurance risk;
- send you personalised and tailored marketing communications and information (including promotions) about us, offers, our partners and our Services as necessary for our legitimate interest in conducting direct marketing services;
- retain your data, as permitted by applicable laws, to contribute towards financial inclusion efforts to ensure your ongoing access to universally beneficial and essential services that contribute to your well-being and protection;
- analyse user data on social media platforms, to identify common characteristics and interests. This analysis allows us to better understand our potential customer base and tailor our social media marketing and advertising efforts to reach individuals who exhibit similar attributes, ensuring our marketing efforts are directed towards a relevant and potentially interested audience;
- detect, prevent, manage and protect against fraud, criminal activity, security breaches, misuse, and other prohibited or illegal activity, claims and liabilities;
- maintain the safety, security and integrity of our website, databases, networks and other technology assets;
- enforce or defend any legal claims;
- manage business continuity incidents, risks and emergencies;
- analyse and gather metrics to better understand how you use our website and Services, and to evaluate and improve them (such as content creation, product offerings and quality management); and
- achieve other purposes described to you when collecting your information.

## Further processing limitation

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We will not collect additional categories of personal information or use the data we have collected for materially different, unrelated, or incompatible purposes without providing you notice. When determining compatibility, we assess whether the new purpose is reasonably aligned with the original purpose for which the data was collected, considering factors such as the nature of the information and its collection, the context of the processing, consequences of further processing and your reasonable expectations.

## When you provide us with information about others

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When a person we contact refers a friend or family member, we may receive that person's contact details in good faith from the referrer as part of the referral process. This indirect collection is permitted under section 12(2)(c) of POPIA, as it does not prejudice the referred person's legitimate interests and is used solely for a once-off referral contact. We process

this information to pursue our legitimate interests in managing our referral programme, as permitted under section 11(1)(f) of POPIA.

### Disclosing your personal information

We may provide access to or disclose your personal information to others for legitimate purposes as permitted by law. For example, we may share your personal information in the following ways:

- to provide our Services to you, we may share your personal information with other service providers, our insurers, industry bodies, financial institutions and credit agencies.
- when we need the assistance of a service provider to conduct our business operations and the service provider must use the information to perform services on our behalf. These service providers have agreed to protect your information based on our instructions and are not authorised by us to use or disclose that information except as strictly needed to perform the services on our behalf.
- some of the services provided by those third parties and business partners may include:
  - operating our website;
  - conducting live direct marketing calls;
  - managing payment authorization and processing; and
  - conducting data analysis and (where relevant) cleansing.
- when required by any regulatory authority, such as the Financial Sector Conduct Authority (FSCA).
- when required by legislation or any legal process.
- to protect and defend our rights and property, including our intellectual property.
- when you have given us direct permission to do so.

We will never share your sensitive personal information such as your banking details and your health information unless we are authorised to do so in terms of an agreement with you, or we must disclose this information by law or in terms of a court order.

Your product terms and conditions describe the terms and conditions of the use of your information in detail.

### Data Processing for Customer and Potential Customer Surveys

For the purposes of conducting customer and potential customer surveys and distributing reports, we utilise the services of our data processor, Smoke Customer Intelligence (Pty) Ltd, which may involve the engagement of a sub-processor, SendGrid Inc., based in Colorado, USA. In this context, limited personal data may be transferred to SendGrid's servers in the USA. SendGrid processes this information solely to facilitate the dispatch of customer surveys and conduct statistical evaluations of reports on our behalf.

For a more comprehensive understanding of SendGrid's privacy practices, you can review their privacy policy at: <https://www.twilio.com/legal/privacy>.

### Transfer of personal information

While we do not generally transfer or store your personal information outside of South Africa, there may be instances where we may need to do so, especially when engaging data processors. In such cases, we will take reasonably practicable steps, which may include a transfer impact assessment, encryption and suitable contractual terms, to ensure any

company or person that we pass your personal information to is required to treat your information with an adequate level of protection.

### **Compulsory information and consequences**

Where we must process certain personal information by law, or in terms of a contract that we have entered with you, and you fail to provide such information when requested, we may be unable to perform in terms of the contract. In such a case, we may have to terminate the contract or relationship with you, after giving you notice and in accordance with the terms of that contract or applicable legislation.

### **Use of technology to monitor your use of our website**

We gather and analyse anonymous information on your use of this website. We use this information to monitor which areas of the website are most frequently visited to assist us to continue developing a value-added service. This information is pooled so individual personal information, behaviour or patterns cannot be identified.

### **Use of cookies**

On some parts of our website, we use so-called "cookie" technology to gather anonymous data about your interactions with our website and Services. Cookie technology consists of small pieces of data or a small text file which is given to your browser by our web server when you visit our website. This data is stored on your browser. The cookie is sent back to our web server each time you visit our website. Cookies are not computer programmes and do not run on a computer like programmes do. They cannot gather information or function on their own.

Cookies serve useful purposes for you, including:

- remembering who you are as a user of our website to remember any preferences or settings you may have selected on our website (functional cookies);
- allowing our website to perform its essential functions. Without these cookies, some parts of our website would stop working (essential cookies). For example, data on error messages displayed to users will be collected and the developer team will assess and solve it;
- monitoring how our website is performing, and how you interact with it to understand how to improve our website or Services (website analytics).

While you can set up your internet browser to disable cookies, we do not recommend that you do this since some parts of this website and our online services may not function properly, or at all.

### **Remarketing**

This website uses remarketing services such as, but not limited to, Google AdWords, Meta and LinkedIn to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who have completed a task on our site, for example, using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page or a site on the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to a website. Any data collected will be used in accordance with our own privacy policy and Google's privacy policy. You may opt-out from Google using cookies to advertise to you by changing your ad settings in your browser or downloading a

Chrome Extension. Opting out of interest-based advertising does not mean you will no longer see advertising online. It does mean that the companies from which you opt-out will no longer show ads that have been tailored to your interests.

### **Business Partners and Third parties**

Whenever we commission our business partners and other organisations to provide services and support, we will bind them to our privacy policies as far as they may need access to personal information to perform such services, and we will ensure that these parties agree to comply with applicable laws. Our website may contain links to or from other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the security or privacy practices employed by other sites. We recommend that you always read the privacy and security statements on such sites.

### **Marketing Communications**

We may use your personal or other information to communicate information on new services or products that may be of interest to you from time to time. If you no longer want us to contact you, please ask us to add your details to our Do-Not-Contact list.

You may email us at [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za) or call us at **Customer Care on 0861 990 000** to lodge your request for a Do-Not-Contact. We may receive contact information from third parties as described in this policy. If you would like to know the source of your contact information, email us at [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za).

Depending on the way you contact us and the nature of your request, we will ask you to verify your identity by:

- providing us with your identity number; or
- providing proof of identity and other information; or
- taking you through a security verification test.

This is for your protection as well as ours.

### **Our security practices**

The Unlimited applies strict technical and organisational measures to ensure the security, integrity and confidentiality of information. These measures include monitoring access and usage of our systems, encrypting sensitive records during storage and transmission, controlling access to our premises, systems, and records, and securely retaining or disposing of records. When we work with third parties, we require them to uphold security, privacy, and confidentiality obligations to protect the personal information we are responsible for. Our security systems are aligned with industry standards, and we continuously monitor and update them as needed. Regular testing is also performed on our systems. We do this to prevent loss of or damage to personal information and to prevent the unauthorised access to personal information.

We make sure our websites are safe to use. When you fill out forms, make purchases or share personal information on our sites, we use strong security measures that follow international standards. Encryption may be used to protect the transmission of your personal information when completing online application forms. Our Internet servers are protected by firewalls and intrusion detection systems. Access to information on these servers is restricted to authorised personnel only.

### External website links and your privacy

Please be aware that our website may contain links to other websites or online services operated by third parties. While we strive to link only to reputable and trustworthy sources, we cannot guarantee the privacy practices of these external sites. When you click on a link to a third-party website, you will be subject to their own privacy policies and practices. We encourage you to review the privacy statements of any website you visit via links from our site to understand how your information may be collected, used, and shared. Your interactions with these external websites are governed by their respective privacy policies and terms of use.

### Public forums and social media: Use of testimonials and reviews

Any testimonial or opinion you post (along with the name provided) on The Unlimited's Facebook page, Twitter page, LinkedIn page, Google review, or website may be used, published and distributed by The Unlimited for publicity and promotional purposes according to our legitimate interests and without any compensation (monetary or otherwise) to you. Any testimonial or opinion may be used in printed publications, multimedia presentations, websites or in any other distribution media.

By publishing any testimonial or opinion on the previously mentioned pages, you agree that you will have no monetary or other claims against The Unlimited for the use and publication of your name, testimonial or opinion.

In addition, you waive any right to inspect or approve the finished product, including a written copy, wherein your testimonial appears. You hereby hold harmless and release The Unlimited from all claims, demands and causes of action which you, your successors, executors, administrators or any other persons acting on your behalf, or on behalf of your estate, have or may have by reason of this use of your personal information.

### Your data protection rights

#### Changes to personal information

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If you would like us to correct any errors, update any of your personal information that we hold, or exercise any other data subject requests please contact Customer Care on 0861 990 000 or submit your request by way of email to [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za).

#### Access to information

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For information about the records that we hold and how you can access information, as permitted by law, please see our PAIA Manual that is available on our website, beneath the Legal tab. You can also get a copy of this PAIA Manual by emailing us at [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za).

#### Object to processing

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You may object to your personal information being processed for a particular activity by submitting an objection notice to [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za), alternatively, by contacting our Customer Care on 0861 990 000. Please see our PAIA Manual for more information. If you do not wish to be contacted for marketing communications, kindly refer to the Marketing Communications section.

## Complaints

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If you have any questions or complaints about your privacy rights, please email [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za) or refer to our Complaint Process on our website. If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the Direct Marketing Association of South Africa through their website, [www.dmasa.org.za](http://www.dmasa.org.za) or with the South African Information Regulator through their website, [www.inforegulator.org.za](http://www.inforegulator.org.za)

If you are located outside of South Africa, you may contact the appropriate regulatory authority in your country of domicile.

## Automated decisions and Information Matching

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Our direct marketing activities may involve information matching programmes or automated decision-making. For example, regularly assessing the quality of personal information, data enrichment, and inferring a profile about a data subject based on characteristics to determine suitability of products and services.

You have the right to query and make representations about such decisions and the underlying logic used. You may request certain information and submit your representations to [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za). Please note, where certain information is proprietary and highly confidential to our business operations, we may not be under an obligation to disclose that specific information.

## Changes to this policy

We may from time to time amend the terms of this policy and upload an updated Privacy Policy to our website. Please check our website for the most recent version.

## Disclaimer

The information contained in this website is for general information purposes only. The information is provided by The Unlimited and while we try to keep the information up to date and correct, any reliance you place on such information is strictly at your own risk. In no event will we be liable for any loss or damage including without limitation to, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website.

Through this website, you can link to other websites which are not under the control of The Unlimited. We have no control over the nature, content and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

Every effort is made to keep the website up and running smoothly. However, The Unlimited takes no responsibility for, and will not be liable for, the website being temporarily unavailable due to technical issues beyond our control.

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- You may not, except with our express written permission, distribute or commercially exploit the content. Nor may you transmit it or store it in any other website or other form of electronic retrieval system.