

# Privacy Policy



# THE UNLIMITED

### **The Fine Print**

Your privacy is important to us at The Unlimited Group (Pty) Ltd. 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 provide various financial, consumer and insurance-related products and services to you in-person, over the telephone and through our website (“our Services”).

### **Who does this policy cover?**

This Privacy Policy doesn’t govern all the information we may process.

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.

Our commitments to policyholders are governed by our membership agreement and disclosures document. This policy must be read with any other documents, agreements or privacy notices that describe how we, process your personal information. If there is any conflict, the terms of the specific 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 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.

We, may, from time to time, collect and use personal information from other sources such as our website, referrals from your friends and family, third party providers and marketing lead generators. Your personal information is also gathered through other channels we use to distribute, communicate and deliver our Services.

## 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 have with you as a customer or supplier, or to provide a solution to you.

This includes to:

- identify you;
- process your requests 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;
- process your requests, claims or instructions;
- enforce any agreement 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 brought to your attention.

### By law

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We process personal information to comply with our legal obligations under South African laws, 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; 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 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;
- send you marketing communications and information (including promotions) about us, our partners and our Services as necessary for our legitimate interest in conducting direct marketing.
- 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 you provide us with information about others

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If you provide us with personal information about someone else (like a friend or family referral), you are responsible for ensuring that you comply with any obligations and consent requirements under applicable data protection laws concerning such disclosure. You must provide them notice and you confirm that you have, if required by law, obtained the individual's consent to provide us with this personal information. It is your responsibility to explain to them how we collect, use, disclose and retain their personal information, or otherwise direct them to read this policy.

## Disclosing your personal information

We may provide access to or disclose your personal information 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 that information except as strictly needed to perform the services on our behalf.
- 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 policy product or service terms and conditions describe the terms and conditions of the use of your information in detail.

## 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 place or are trying to enter into with you. In such a case, we may have to terminate the contract or relationship with you, upon due notice to you and in accordance with the terms of that contract or applicable legislation.

## Transfer of personal information

We may securely transfer or store your personal information outside South Africa.

We will take reasonably practicable steps 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.

### **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, Facebook 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 haven't 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. We do this to prevent loss of or damage to personal information and to prevent the unauthorised access to personal information.

We are committed to providing secure online services. Interactions with our transactional sites may be protected through encryption that complies with 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.

## Privacy and security statements applying to specific online services

Different online services and other entities may have their own privacy and security policies because the nature of their services or products demands a deviation from our general policy. These specific policies will apply to and exclusively govern your use of the particular online service.

## 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 or update any of your personal information that we hold, please contact Customer Care on 0861 990 000. For any other data subject requests, please email [dataprivacy2@theunlimited.co.za](mailto:dataprivacy2@theunlimited.co.za)

Depending on the way you contact us, we will ask you to verify your identity by providing us with your identity number or provide proof of identity and other information or take you through a security verification test. This is for your protection as well as ours.

### 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 [dataprivacy@theunlimited.co.za](mailto:dataprivacy@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 [dataprivacy@theunlimited.co.za](mailto:dataprivacy@theunlimited.co.za). Please see our PAIA Manual for more information. If you wish to not 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 [dataprivacy@theunlimited.co.za](mailto:dataprivacy@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 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.

### 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 endeavour 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.

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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.