



PROTECTION OF INFORMATION PROCEDURE

This policy explains how Olive Insurance Brokers (Pty) Ltd, (Olive) process our Clients' personal information, within the limitations and subject to the requirements set by the Protection of Personal Information Act ("POPIA" or 'the Act').

By processing, we mean any activity concerning personal information, for example:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form;
- merging, linking, restriction, degradation, erasure or destruction of information.

By personal information, we mean information relating to an identifiable person - living natural person or existing juristic person as far as applicable.

Olive is a Responsible Party as defined by the Act, which means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information" and which are obliged to:

- comply with the Processing Conditions, including the security, record retention and notification requirements,
- appoint and register information officers, and
- in certain instances obtain prior authorisation from the Regulator.

As a Responsible Party, Olive can decide:

- to collect the personal data in the first place and the legal basis for doing so;
- which personal data to collect;
- the purpose(s) the data are to be used for;
- which individuals to collect data about;
- whether to disclose the data, and if so, who to;
- whether subject access and other individuals' rights apply i.e. the application of exemptions; and
- how long to retain the data or whether to make non routine amendments to the data

Olive is committed to protecting our Clients privacy and ensuring that their personal information is collected and used properly, lawfully and transparently.



Key principles

The purpose of this policy is to explain how Olive deal with our Clients personal information within the parameters set by POPI. From the outset, it is important to know that our Clients are entitled to all rights which they may have in terms of the Act, and for more information on what these rights involve, Olive refers you directly to the Act. Furthermore, the Regulator may from time to time issue Codes of Conduct for various industries. Olive will adhere to those Codes of Conduct which apply to it. For this reason and as set out in more detail below, this policy is subject to the Act and any applicable Codes of Conduct issued by the regulator from time to time.

The key principles of this policy are:

- Olive values the trust that our Clients place in us by giving us their personal information. Olive will always use our Clients personal information in a way that is fair and worthy of that trust.
- Our Clients are entitled to clarity on how Olive use their personal information. Olive will always be transparent with them about what information Olive collect, what Olive does with it, with whom we share it and whom our Clients should contact if they wish to know more or have any concerns.
- Olive will work with our Clients to promptly resolve any query or concern which they may have on how Olive use their information.
- Olive will take all reasonable steps to protect our Clients information from misuse and keep it secure.
- Olive will comply with all applicable data protection laws and regulations and Olive will co-operate with data protection authorities. In the absence of data protection legislation, Olive will act in accordance with the general accepted principles governing data protection.

The information we collect

Olive collects and process our Clients' personal information mainly to provide Clients with access to the various products and services, to help improve Olive's offerings to our Clients and for certain other purposes explained herein.

Olive only collects as little personal information as possible. Personal information is only obtained by limited and lawful processing that does not unnecessarily infringe privacy and is as a general rule collected from Clients.

The type of information we collect will depend on the purpose for which it is collected and used. Olive will only collect information that we need in order to provide our Clients with the product which our Clients have selected, and services flowing therefrom at the standard which they are entitled to expect.

Olive collects information directly from our Clients, and from 3rd parties such as previous insurers with the Client's consent, for example when Clients take out an insurance products with Olive or when



Olive

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www.olivebrokers.co.za | Olive Insurance Brokers (Pty) Ltd is an authorized FSP44743

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Clients submit enquiries or claims to Olive. Where possible, we will inform Clients what information they are required to provide and what information they may choose to provide.

We also collect information about the client from other sources as explained herein.

How we use their information

Olive will use our Clients' personal information only for the purposes for which it was collected or agreed with you, for example:

- to provide products and services to our Clients, to carry out the transaction they requested and to maintain our relationship with them;
- for underwriting purposes;
- to assess and process claims;
- to conduct credit reference searches or verification should it be required by a certain insurer or service providers;
- to confirm and verify our Clients' identity;
- for operational purposes, and where applicable, credit scoring and assessment and credit management;
- for purposes of claim checks;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- to conduct market or customer satisfaction research or for statistical analysis;
- for audit and record keeping purposes;
- for liaising with third party service providers to offer those services to our Clients which may be necessary in terms of the policy we have with them;
- in connection with legal proceedings.

Olive will also use our Clients personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect Olive's interests).

The processing of our Client's personal information will at all times be done lawfully and not in a manner that infringes on Client privacy.

Disclosure of information

Olive may disclose our Clients' personal information to our service providers who are involved in the delivery of products or services to our Clients, in terms of this policy. We have agreements in place with such service providers to ensure that they comply with these privacy terms.

Olive may share our Clients personal information with, and obtain information about them from:

- third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies;
- other insurers to prevent fraudulent claims;
- other third parties from whom they have chosen to receive marketing information.



Olive may also disclose information:

- where we have a duty or a right to disclose in terms of law or industry codes;
- where we believe it is necessary to protect our rights.

Personal information may be used for further processing, but shall only be done so when compatible with the purpose for which such personal information was collected in the first instance.

Olive will only keep Clients' personal information for as long as we are authorised to do so

- in accordance with your consent, or
- in accordance with any law, or
- in accordance with any lawful business reason to keep such information

Information Security

Olive is obliged to provide adequate protection for the personal information we hold and to prevent, as far as practically possible unauthorised access and use of personal information. We will, on an ongoing basis review security controls and related processes to ensure that our Clients' personal information remains secure.

Our security procedures include, amongst others:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information according to legislation;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents in the event of one occurring

When Olive contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we are responsible for, is kept secure.

Olive makes use of cloud-based data storage system setup at reputable hosting providers on a managed server. These cloud based systems has version control on all files so we can restore a file within minutes if deleted or altered (ransomware). The server is backed up every night. All data is encrypted on server level.

Olive uses a standard VOIP PABX to fit its operational requirements. This includes voice logging capabilities.



We use reputable vendors for VIOP services. All voice recordings are held on a cloud server with daily backup of the voice recordings. If a voice recording is deleted a request will be send to Euphoria to restore it.

Client's Rights: Access to information

Our Clients have the right to request a copy of the personal information which we have on record for them by simply contacting Olive. We will take all reasonable steps to confirm their identity before providing details of the personal information.

Updating information

Our Clients have the right to ask us to update, correct or delete their personal information. They may do this by contacting us at the numbers/addresses provided on our website, subject to the requirements to which we must comply in terms of the law.

Olive will take all reasonable steps to confirm the identity of a Client before making changes to the personal information we may hold about the Client.

Olive will ensure that we have the correct information on an annual basis during our renewal process.

Changes to the policy

This document might change as required from time to time.

How to contact us

If our Clients have questions about this policy or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct their personal information, they may contact us at +27(0)11 462 3393 or email us on daneel@olivebrokers.co.za.

