

PRIVACY POLICY

1. Customer Privacy Notice

This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act ("POPIA").

At African Rainbow Life, we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

This Notice sets out:

- Who we are
- Why we collect information
- How we collect information
- How we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Changes to this Notice
- How to contact African Rainbow Life

1.1. Who We Are

In this Notice, "African Rainbow Life", "ARL" or "we" refers to African Rainbow Life (Pty) Ltd that operate in South Africa.

1.2. Why We Collect Information

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

1.3. How We Collect Your Information

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in the African Rainbow Life Group in order to offer you a more consistent and personalised experience in your interactions with African Rainbow Life.

We also collect information about you from other sources as explained below.

- **Cookies**

We, our third-party service providers, and our partners may send "cookies" to your computer or use similar technologies to enhance your online experience at our Website and across the Internet. "Cookies" are files that can identify you as a unique customer and store your personal preferences as product preferences to tell us which site pages you have visited and in what order.

We use cookies and other technical information to personalise your visit to the Website, to analyse traffic on the Website and to track user trends, patterns and selections for authorised download and for technical reasons connected with your use of our site. Cookies can either be permanent (i.e. they remain on your computer until you delete them) or temporary (i.e. they last only until you close your browser).

- **Web Beacons**

We may also use "web beacons" that monitor your use of our Website. Web beacons (or web bugs) are small strings of code that provide a method for delivering a graphic image on a web page for the purpose of transferring data, such as the IP (Internet Protocol) address of the computer that downloaded the page on which the web beacon appears, the URL (Uniform Resource Locator) of the page on which the web beacons appears, the time the page containing the web beacon was viewed, the types of browser that fetched the web beacon and the identification number of any cookie on the computer previously placed by that server.

When corresponding with you via HTML capable e-mail, web beacons let us know whether you received and opened our email. On their own, cookies or web beacons do not contain or reveal any Personal Data. However, if you choose to provide us with Personal Data, it can be linked to the anonymous data stored in the cookies and/or web beacons. Most browsers are initially set to accept cookies. However, if you prefer, you may adjust your browser to reject cookies from us or from any other website. Additionally, by setting your web browser to display HTML emails as text only, you may be able to prevent the use of some web beacons. However, please note that certain areas of our Website can only be accessed in conjunction with cookies or similar devices.

- **Google Analytics**

From time to time we may implement additional features including remarketing with Google Analytics to place ads on

other sites you may visit after visiting our site, Google Display Network Impression Reporting to report how people's interactions with our ads relate to their visits to our site, DoubleClick Platform integrations to help optimize our online advertising efforts, or Google Analytics Demographics and Interest Reporting to analyse information about our site visitors' interests.

These tools help us to better understand your interests and how to provide you with more relevant online advertising. We and third-party vendors, including Google, may use first- and third-party cookies together to optimize and serve ads tailored to you based, for example, on what parts of our site you viewed.

If you do not wish your personal information to be used in this way Users may opt out use of cookies by visiting:

Google: <http://www.google.com/policies/privacy/ads/> or <https://tools.google.com/dlpage/gaoptout>.

DoubleClick cookies please visit <https://www.google.com/settings/ads/plugin>

Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp

Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices/>

Digital Advertising Alliance Canada (DAAC): <http://youradchoices.ca/choices>

Digital Advertising Alliance EU (eDAA): <http://www.youronlinechoices.com/>

For more information about your cookies options visit <http://www.networkadvertising.org/choices/#completed>.

- **Registration**

When you register on our websites, applications or services; this may include your name, email address, telephone number and ID number. We may ask you to provide additional information to verify your account.

- **Completion of forms**

By completing online forms (including call back requests), take part in surveys, post on our message boards, post any blogs or enter any competitions or prize draws download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service.

We will also collect your information where you only partially complete and/or abandon any information inputted into our website and/or other online forms and may use this information to contact you to remind you to complete any outstanding information and/or for marketing purposes.

- **Comments**

When visitors leave comments on the site, we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

- **Embedded content from other websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website

- **Media**

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

- **Social Media**

By interacting with us on social media channels, whether in public comments, or private inbox messages.

- **WhatsApp**

By interacting with us on our official WhatsApp line on +27 81 029 7458.

- **Chatbots**

By interacting with us through our chatbots.

- **Offline contact**

Contacting us offline by telephone, SMS, email or post.

1.4. How We Use Your Information

We will use your personal information only for the purposes for which it was collected or agreed with you and that is permissible under applicable law, for example:

- To record, process, continuously maintain and update your information
- To perform statistical analysis,
- To distribute African Rainbow Life marketing material
- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship
- For underwriting purposes

- To assess and process claims
- To conduct credit reference searches or verification
- To confirm and verify your identity or to verify that you are an authorised user for security purposes
- For operational purposes, and where applicable, credit scoring and assessment and credit management
- For purposes of claim checks (e.g. the ASISA Life and Claims Register)
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- For debt tracing or debt recovery
- To conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- Undertake internal testing of our website, applications, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure it is only displayed at aggregated levels which will not be linked back to you or any living individual;
- In connection with legal proceedings.

We will also use your 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 African Rainbow Life's interests).

1.5. Ongoing Financial Services

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

Please email your ID number to info@africanrainbowlife.co.za with the subject line "OPT OUT OF MARKETING" if you do not want to receive such financial services information. You may opt out at any time if you don't want to receive any further communications of this nature.

You may also give and withdraw consent and tell us what your communication preferences are by contacting us at the numbers/addresses provided below.

1.6. Disclosure of Information

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal information with, and obtain information about you 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 companies in the African Rainbow Life Group when we believe it will enhance the services and products, we can offer to you, but only where you have not objected to such sharing
- Other third parties from whom you have chosen to receive marketing information

We may also disclose your 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.

1.7. Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

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

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

We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

1.8. Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses listed below and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

1.9. Correction of Your Information

You have the right to ask us to update, correct or delete your personal information. You may do this by simply contacting us at the numbers/addresses provided below.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate. Please update your information by contacting us at the numbers/addresses provided below.

1.10. Changes to This Notice

Please note that we may amend this Notice from time to time. Please check this website periodically to inform yourself of any changes.

1.11. How to Contact Us

If you have questions about this Notice 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 your personal information, please contact us at the following numbers/addresses:

- Registered physical address: 1 Sturdee Ave, Rosebank, Johannesburg 2196 South Africa
- Telephone number: +27 010 880 5055
- Email address: info@africanrainbowlife.co.za

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African Rainbow Life