



## Our Privacy Statement

### DEFINITIONS

“We”, “us” and “our” refers to Discovery Connect Distribution Services (Proprietary) Limited (“Discovery Connect”), a private company with limited liability registered under the company laws of the Republic of South Africa, registration number 2015/173165/07. Discovery Connect is a licensed authorised financial services provider. The principal place of business of Discovery Connect is 1 Discovery Place, Sandton, Johannesburg, 2196.

“You” and “your” refers to you as the owner of the plan or policy intermediated by Discovery Connect. “Your personal information” refers to personal information about you, your spouse, your dependants and your beneficiaries (as relevant). It includes information about health, financial status, gender, age, contact numbers and addresses.

“Process information” means the automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.

“Competent person” means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child, for example a parent, legal guardian or curator *bonis*.

1. When you engage with us, you trust us with personal information about yourself, your spouse, your dependants, your family and beneficiaries. You understand that when you include your spouse and/or dependants on your application, we will process their personal information for the activation of the policy/benefit and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Statement. We are committed to protecting your right to privacy. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in line with the Protection of Personal Information Act (“POPIA”).
2. You have the right to object to the processing of your personal information. It is voluntary to accept these terms and conditions. However, we require your acceptance to activate and service your policy. This means that if you do not accept the terms of this Privacy Statement, we cannot activate and service your policy. The acceptance of these terms and conditions and the permission given to process your personal information will continue after your death.
3. We will keep your personal information confidential. You may have given us this information yourself or we may have collected it from other sources. If you share your personal information with any third parties, we will not be responsible for any loss or harm suffered by you, your spouse, your dependants or your beneficiaries.



4. You warrant that when you give us personal information about your spouse, your dependants, or your beneficiaries, you have received their permission to share their personal information with us for the purposes set out in this Privacy Statement or any other related purposes.
5. You understand that when you include your spouse and/or dependants on your application, we will process their personal information for the activation of the policy/benefit and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Statement.
6. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give consent for them.
7. You confirm that you give us consent to:
  - 7.1 Share with the appointed financial adviser the policy information, including your personal information, necessary to ensure the efficient administration of the policy and to ensure that we comply with all relevant legislation; as well as
  - 7.2 Share your health information with the financial advisor during any underwriting process.
8. You agree that we may process your personal information for the following purposes:
  - 8.1 Underwriting and administering this policy and for the assessment of any claims under this policy;
  - 8.2 Mandatory requirements under relevant laws;
  - 8.3 Product administration;
  - 8.4 Fraud prevention;
  - 8.5 Law enforcement, anti-money laundering and counter-terrorist financing initiatives;
  - 8.6 To profile and analyse risk;
  - 8.7 Using automated means (without human intervention in the decision-making process) to make a decision about you or your application for any product or service. You may query the decision made about you.
  - 8.8 Enabling any entity within the Discovery Group and any third party provider or any financial services provider or its representative approved by the Discovery Group to advise you of, or offer to you, any enhanced benefits or new products that become available from time to time which you may become entitled to or qualify for; and
  - 8.9 Providing other product providers in the Discovery Group that you currently subscribe to, such as Discovery Vitality, Discovery Invest and Discovery Insure, with information necessary for the operation of their products
  - 8.10 Providing relevant information, including your personal information, to a contracted third party who requires such information to render a service to you in relation to this policy, provided that such contracted third party agrees to keep the information confidential.
9. If you are a member of the Vitality programme, you further agree that we may process your personal information for the following purposes:
  - 9.1 The administration of the Vitality programme;
  - 9.2 The provision of any services that you or any dependant on your Vitality policy may require;
  - 9.3 The rendering of services by Vitality; and



- 9.4 The provision of relevant information to a contracted third party who require such information to render a service to you or any dependant on your Vitality policy and only if such contracted third party agrees to keep the information confidential.
10. Further to the above, if a third party asks us for any of your personal information, we will share it with them only if:
- 10.1 You have already given your consent for the disclosure of this information to that third party;
  - 10.2 We have a legal or contractual duty to give the information to that third party; or
  - 10.3 For any of the purposes set out below.
11. You confirm that we may share your personal information within the Discovery Group of companies for:
- 11.1 Administration;
  - 11.2 Fraud prevention; and
  - 11.3 Where necessary to provide Group-wide services, benefits and infrastructure to help you in your personal or professional capacity.
12. You consent and agree that we may process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists;
- 12.1 You also consent to us communicating such personal information to local and international Regulatory Bodies as well as to other entities in the Discovery Group if you are matched to one of these sanctions lists;
  - 12.2 You understand that we may terminate this agreement with immediate effect if you are found to be on a sanctions list.
13. You also confirm that we may share and combine all your personal information for any one or more of the following purposes:
- 13.1 Market, statistical and academic research; and
  - 13.2 To customise our benefits and services to meet your needs

You agree that your personal information may be shared with third parties such as academics and researchers, including those outside South Africa. We ensure that the academics and researchers will keep your personal information confidential and all data will be made anonymous to the extent possible and where appropriate. No personal information will be made available to a third party unless that third party has agreed to abide by strict confidentiality protocols that we require. If we publish the results of this research, you will not be identified by name.

14. If we need to share your personal information for any other reason, we will do so only with your permission
15. We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal



information from you directly. Where we are unable to do so, we will make use of verifiable independent third-party data sources.

16. You authorise us to obtain and share information about your creditworthiness or the creditworthiness of any payer on your policy with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history and sharing of information for purposes of risk analysis, tracing and any related purposes.
17. We have the right to communicate with you electronically about any changes on your policy, including your contributions or changes and improvements to the benefits you are entitled to on the policy you have chosen.
18. We have a duty to keep you updated about any offers and new products that we make available from time to time. Any entity within the Discovery Group and contracted third-party service providers may communicate with you about these.
19. Please let us know if you do not wish to receive any direct telephone marketing from the Discovery Connect Distribution Services.
20. You may opt out of Electronic Marketing on [www.discovery.co.za](http://www.discovery.co.za) or the Discovery App. We will store your personal information for the purpose to action this request and action it as soon as reasonably possible.
21. You have the right to know what personal information we hold about you. If you wish to receive a copy, please complete a form called an 'Access Request Form' and specify the information you would like. This form is part of the Discovery Manual to Accessing Information and can be found on the Discovery website at [www.discovery.co.za](http://www.discovery.co.za) under "Legal" at the bottom of the "Home" page.

We will take all reasonable steps to confirm your identity before providing details of your personal information.

We are entitled to charge a fee for this service and will let you know what it is at the time of your request.

22. You have the right to ask us to update, correct or delete your personal information. Where we cannot delete your personal information, we will take all steps to make it anonymous. You agree that we may keep your personal information until you ask us to delete or destroy it. This is unless the law requires us to keep it.
23. We are required to collect and keep personal information in terms of the following laws:
  - The Electronic Communications and Transactions Act (ECT)
  - The Financial Intelligence Centre Act (FICA)
  - The Financial Advisory and Intermediary Services Act (FAIS)
  - The National Credit Act (NCA)
  - The Consumer Protection Act (CPA); and
  - Long Term Insurance Act (LTIA); amongst others
24. You agree that we may transfer your personal information outside South Africa:



- 24.1 If you give us an email address that is hosted outside South Africa; or
- 24.2 To administer certain services, for example, cloud services; or
- 24.3 Where required to administer any offshore product, for instance your Dollar Life Plan.

We will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

- 25. If we become involved in a proposed or actual merger, acquisition or any form of sale of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.
- 26. We may change this Privacy Statement at any time. The most updated version will be always be available on [www.discovery.co.za](http://www.discovery.co.za).
- 27. If you believe that we have used your personal information contrary to this Privacy Statement, you have the right to lodge a complaint with the Information Regulator, under POPIA, but we encourage you to first follow our internal complaints process to resolve the complaint. We explain the complaints and disputes process on the website [www.discovery.co.za](http://www.discovery.co.za) or contact our Information Officer at [privacy@discovery.co.za](mailto:privacy@discovery.co.za) If, thereafter, you feel that we have not resolved your complaint adequately kindly contact the contact the Information Regulator

The contact details are:

The Information Regulator (South Africa)

SALU Building,  
33 Hoofd Street,  
Forum III, 3<sup>rd</sup> Floor Braampark  
P.O. Box 31533  
Tel No. +27 (0) 10 023 5207  
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