



Our Privacy Statement

Definitions

We, us and our

refers to Discovery Life Limited, a public company with limited liability, as well as a licensed insurer and authorised financial and credit services provider, registered under the company laws of the Republic of South Africa, registration number 1966/003901/06, and where applicable Discovery Vitality (Proprietary) Limited (“Vitality”), a private company with limited liability registered under the company laws of the Republic of South Africa, or both companies as the case may be. The principal place of business of both companies is 1 Discovery Place, Sandton, Johannesburg, 2196.

You and your	refer to you as the employer or retirement fund who is the owner of the plan.
Funds and Scheme	mean the Discovery Life Pension Umbrella Fund or Discovery Life Provident Umbrella Fund or Discovery Group Risk Scheme.
Your personal information	refers to personal information about you, your employees or retirement fund members, their spouse, dependants and beneficiaries (as relevant). It includes information about 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 or legal guardian.

Purpose of this Privacy Statement

When you engage with us, you trust us with personal information about yourself, your employees and retirement fund and scheme members. We are committed to protecting your right to privacy. We'll take all reasonable steps to keep the personal information safe and confidential. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process personal information, in line with the Protection of Personal Information Act ("POPIA").

Indemnification

Each party accepts responsibility to the extent that the processing activities of personal information fall under the control of that party and agrees to indemnify the other party/ies against any loss or damage, direct or indirect, that an employee may suffer because of any unauthorised use of the employees' personal information or if a breach of the employees' personal information occur, but only if the processing of that personal information is controlled by that party.

Acceptance is voluntary

You have the right to object to the processing of the personal information. It is voluntary to accept these terms and conditions. However, we require your acceptance to provide you with our products and services. We need personal information about you, your employees, retirement fund and scheme members. We will only collect and process personal information for valid and lawful reasons. The acceptance of these terms and conditions and the permission given to process the personal information will continue after death.

We keep personal information confidential

We will keep personal information confidential. You may have given us this information yourself or we may have collected it from other sources. If you share personal information with any third parties, we will not be responsible for any loss you suffer.

Authority to act for other people

You warrant that when you give us personal information about third parties, you have received their permission to share their personal information with us. You understand that when you include your employees, retirement fund or scheme members, their spouses, dependants and beneficiaries, we will process their personal information for the activation of the policy or benefits and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Statement and other related purposes.

Purpose for processing your personal information

You agree that we may process your personal information for the following purposes:

1. Administering the Fund or Scheme
2. Assessing any claims submitted to the Fund or Scheme
3. Allowing any of the following to advise you about or offer to you any improved benefits or new products that you may qualify for by:
 - Any company in the Discovery Group
 - Any third-party provider
 - Any financial services provider or its representative approved by Discovery
4. Providing relevant information, including your and your employees' personal information, to a contracted third party who needs the information to provide a service to you relating to the Fund or Scheme. We will ensure that the third party has agreed to keep the information confidential.

Sharing personal information with third parties

If your employee or member of the Fund or Scheme is a member of the Vitality programme, you further agree that we may process their personal information for the following purposes:

1. The administration of the Vitality programme
2. The provision of any services that your employee or member of the Fund or Scheme or any dependant on their Vitality policy may require
3. The rendering of services by Vitality
4. The provision of relevant information to a contracted third party who requires such information to render a service to your employee or any dependant on their Vitality policy and only if such contracted third party agrees to keep the information confidential.

By agreeing to this, you confirm that you have obtained adequate consent from your employees, retirement fund and Scheme members to:

1. Share with the appointed financial adviser the policy information, including their personal information, necessary to ensure the efficient administration of the policy and to ensure that we comply with all relevant legislation
2. Share their health information with the financial adviser during any underwriting process
3. Process information using automated means (without human intervention in the decision-making process) to make a decision about them or their application for any product or service. They may query the decision made about them.

You agree to indemnify us against any loss or damage, direct or indirect, that an employee or retirement fund or scheme member suffers because of the unauthorised use of their personal information.

Sanction screening

You consent and agree that:

5. 1. We may process your, your employees, shareholders and beneficial owners' information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists;
6. 2. 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;
7. 3. You understand that we may terminate this agreement with immediate effect if you, your employees, any shareholders or beneficial owners are found to be on a sanctions list.

If a third party asks us for any of your personal information, we will share it with them only if:

- You have already given your consent for the disclosure of this information to that third party
- Third parties that we contract with to provide services to you, for example auditors
- Any person or organisation that has a legal right to access the information, for example, regulators, and your financial adviser; and
- For any of the purposes set out below.

Sharing personal information with the Discovery Group

You confirm that we may share your personal information within the Discovery Group of companies for all of the following:

1. Administration;
2. Fraud prevention; and
3. Providing Group-wide services, benefits and infrastructure (where necessary) to help your employees or retirement fund members in their personal or professional capacity.

Sharing for research and improvement purposes

You also confirm that we may share and combine all your personal information for any one or more of the following purposes:

1. Market, statistical and academic research; and
2. To customise our benefits and services to meet your needs.

You agree that the 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 the 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, your employees, retirement fund and scheme members will not be identified by name.

If we want to share your personal information for any other reason, we will do so only with your permission.

Obtaining and sharing personal information for credit purposes

By agreeing to this, you authorise us to obtain and share information about your creditworthiness with any credit bureau or credit providers 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.

Obtaining personal information for data quality purposes

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.

Right to communicate electronically

We have the right to communicate with you electronically about any changes on the policies of your employees, retirement fund and scheme members, including their contributions or changes and improvements to the benefits they are entitled to in terms of rules of the Funds.

Duty to keep you informed

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.

Please let us know if you wish to receive any direct telemarketing from the Discovery Group.

Direct Electronic Marketing

You may opt out of Electronic Marketing on 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.

You have the right to know what personal information we have

Your employees, retirement fund and scheme members have the right to know what personal information we hold about them. If they wish to receive a copy, they can complete a form called an Access Request Form and specify the information they 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 under Legal at the bottom of the home page. They can specify the information they would like. We will take all reasonable steps to confirm their identity before providing details of their personal information.

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

You, your employees, retirement fund and scheme members have the right to ask us to update, correct or delete personal information. Where we cannot delete the personal information, we will take all steps to make it anonymous. You agree that we may keep the personal information until you ask us to delete or destroy it. This is unless the law requires us to keep it.

The following are examples of laws that require us to collect and keep personal information:

- 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 Pension Funds Act (PFA);
- The Collective Investment Schemes Control Act (CISCA)
- The Consumer Protection Act (CPA); and
- Long-term Insurance Act (LTIA).

Transferring your personal information outside South Africa

You agree that we may transfer your personal information outside South Africa:

- If you give us an email address that is hosted outside South Africa
- To administer certain services, for example, cloud services, and
- Where required to administer any off-shore product.

We will take reasonable steps to 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 required by the laws of the country to which the information is transferred.

Sharing your personal information for merger, acquisition or sale purposes

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, your employees', retirement fund and scheme members' 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 the personal information. The terms of this Privacy Statement will continue to apply.

Changing this Privacy Statement

We may change this Privacy Statement at any time. The most updated version will always be available on www.discovery.co.za.

If you have any concerns

If you believe that we have used your, your employees' and retirement fund members' personal information contrary to this Privacy Statement, you must first attempt to resolve any concerns with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator, under POPIA.

The contact details are:

The Information Regulator (South Africa)

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za