

ATTOOH! CONSULTING PRIVACY STATEMENT

DISCOVERY PRIVACY POLICY

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ATTOOH! CONSULTING PRIVACY STATEMENT

DEFINITIONS

“**We**,” “**Us**” and “**Our**” refers to Attooh Consulting Services Holdings (Pty) Ltd (“Attooh Consulting”), a private company with limited liability, and a juristic representative of Discovery Life Ltd an authorised financial services provider, FSP18147, duly licensed and registered under the company laws of the Republic of South Africa.

The principal place of business of Attooh Consulting is:

The principal place of business of Discovery Ltd as the license holder is: 1 Discovery Place, Sandton, Johannesburg, 2196.

“**You**” and “**Your**” refers to you as the policy owner of, or the insured on a Discovery policy taken out with Attooh Consulting.

“**Your Personal Information**” refers to personal information which includes special personal information about you, your spouse, the insured, your dependents, and your beneficiaries (as may become relevant depending on the context and type of policy).

Your Personal Information includes without limitation:

- Financial information
- Information about your health, biometrics, or criminal behavior
- Your gender or sex
- Your age
- Unique identifiers such as your identity number, policy numbers or contact numbers
- Your addresses.

“**Discovery Group**” refers to Discovery Limited and its subsidiaries.

“**Process Information**” means the automated or manual activity of (without limitation) collecting, retention, use, recording, organizing, storing, updating, distributing, and removing or deleting your personal information.

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

1. When you engage with us, you entrust us with your Personal Information. You understand that when you include your spouse and/or dependents in your application, we will process their Personal Information for the activation of the policy or benefit and to pursue their legitimate interests. We will furthermore process their Personal 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 granted to process your Personal Information will continue after your death.

3. You agree that any Personal Information you provide us, is provided voluntarily. You also agree that if you do not provide the necessary Personal Information, we may not be able to comply with our obligations.
4. We will keep your Personal Information confidential. You may have provided Personal 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 dependents or your beneficiaries, your directors, shareholders, or your employees, as may be applicable.
5. You warrant that when you give us Personal Information about your spouse, the insured, your dependents, your beneficiaries or any other third party, 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 purpose.
6. You understand that when you include your spouse, the insured, your dependents and/or beneficiaries on your application, we will process their Personal Information for the activation of the policy/benefit and to manage their legitimate interests as applicable. We will furthermore process their information for the purposes set out in this Privacy Statement.
7. If you are providing consent for a person under 18 (a minor) you confirm that you are a competent person and that you have the required authority to do so.
8. By applying for a policy through Attooh Consulting, you confirm that you give us consent to share with the appointed financial adviser and the relevant Discovery product provider 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.
9. You agree that we may process your Personal Information for the following purposes:
 - 9.1. Underwriting and administering this policy and for the assessment of any claims under the policy;
 - 9.2. 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.
 - 9.3. Enabling any entity within the Discovery Group and any third-party provider or any financial services provider or its representative approved by Attooh Consulting and 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
 - 9.4. Providing relevant information, including your Personal Information, to a contracted third party (including any contracted reinsurer) who requires such information to render a service to you in relation to your policy, provided that such contracted third party agrees to keep the information confidential.
10. If you are a member of the Vitality or similar rewards programme linked to a policy, you further agree that we may process your and your family members' Personal Information for the following purposes:
 - 10.1. The administration of the Vitality or similar link rewards programme;
 - 10.2. The provision of any services that you or any dependent on your Vitality or similar linked rewards may require;
 - 10.3. The provision of services by Vitality or any similar linked rewards programme; and
 - 10.4. The provision of relevant information to a contracted third party who may require such information for the provision of a service to you on your Vitality or similar linked rewards programme to your policy if such contracted third party agrees to keep the information confidential.
11. Further to the above, if a third party asks us for any of your personal information, we will share it with them only if:
 - 11.1. You have already given your consent for the disclosure of this information to that third party;
 - 11.2. We have a legal or contractual duty to give the information to that third party; or

- 11.3. The disclosure is in line with what is set out in this Privacy Statement.
12. You confirm that we may exchange your personal information with any company operating in the Discovery Group for:
- 12.1. Administration purposes;
 - 12.2. Fraud detection and prevention purposes; and
 - 12.3. Where necessary, to provide you with services, benefits, and infrastructure available from companies operating in the Discovery Group.
13. You consent and agree that we and/or the Discovery Group may process your Personal Information to conduct sanction screening against all mandatory and non-mandatory sanctions lists;
- 13.1. You also consent to us communicating such Personal Information to other insurers, law enforcement agencies, local and international professional and regulatory bodies and to other entities in the Discovery Group if you are associated in any way with one of these sanctions lists;
 - 13.2. You understand that we may terminate your policy with immediate effect if you are found to be on a sanctions list.
14. You confirm that we may exchange and combine your Personal Information (including your unique personal identifiers) with any service provider and/or any company operating in the Discovery Group for any one or more of the following purposes, whether directly or through a third party:
- 14.1. Market, statistical and academic research, including cross company analytics;
 - 14.2. The customisation and enhancement of our and the Discovery Group's benefits and services;
 - 14.3. The conducting of surveys relating to our and the Discovery Group's products and services; and
 - 14.4. The marketing of our and the Discovery Group's services to you for the relevant products for which we are licensed.
15. You agree that your Personal Information may, for legitimate purposes, be shared by the Discovery Group with third parties such as academics and researchers, including those outside of South Africa. We will ensure that the academics and researchers are obliged to keep your Personal Information confidential, and all data will be made anonymous to the extent possible and where appropriate. If results of this research are published, you will not be identified by name. No Personal Information will be made available to a third party unless that third party has agreed to abide by strict confidentiality protocols.
16. 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 try to obtain Personal Information from you directly. Where we are unable to do so, we and/or the relevant Discovery product provider will make use of verifiable information from sources within the Discovery Group and/or independent third parties.
17. By completing the application process, you authorize us and the relevant Discovery product provider to obtain and share information about your creditworthiness and / or the creditworthiness of any payer on your policy with any credit bureau, association, or industry body. This authorization includes information about your credit history, financial history, legal judgments, default history and information for purposes of risk analysis, tracing, debt recovery and any related purposes.
18. Attooh Consulting and/or the relevant Discovery product provider has the right to communicate with you electronically about any changes on your policy, including changes to your contributions or changes and improvements to the benefits you are entitled to on your policy.
19. Attooh Consulting Services and/or the relevant Discovery product provider has a duty to keep you updated about any offers and new products that may be made available from time to time. Any entity within the Discovery Group and contracted third-party service providers may communicate with you about these and you accordingly consent to these entities communicating with you.

20. Please let us know if you do not wish to receive any direct telephone marketing from Attooh Consulting Services and/or the Discovery Group.
21. You may opt out of Electronic Marketing by:
- 21.1. Calling our office on: 012 368 9900
 - 21.2. Logging into your profile on www.discovery.co.za or the Discovery App;
 - 21.3. Following the unsubscribe prompts in the electronic marketing communication section of the website and App; or
 - 21.4. Calling the Discovery Life call center on: 0860005433
- Attooh Consulting and/or Discovery will store your personal information to action this request as soon as possible.
22. You have the right to know what Personal Information we store about you. If you wish to access this information, please complete the [Access Request Form 1](#). Annexure hereto.
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 we will let you know what it is at the time of your request.
23. We may keep your personal information until you ask us to delete or destroy it. We will comply with your request unless the law allows or requires us to retain your Personal Information for the pursuit of our legitimate business purposes. Where we cannot delete your personal information, we will take all reasonable steps to make it anonymous.
24. You have the right to ask us to update, correct or delete your Personal Information by completing the [Request for Deletion or Correction of Information Form 2](#). Annexed hereto.
25. Where we are legally required by law to collect and retain Personal Information, we shall do so. At a minimum, this may include (but not limited to) complying with the following (or any other) legislation and as amended from time to time:
- The Electronic Communications and Transactions Act (ECT)
 - The Financial Intelligence Centre Act (FICA)
 - The Financial Advisory and Intermediary Services Act (FAIS)
 - The Consumer Protection Act (CPA)
 - Long Term Insurance Act (LTIA)
 - Short Term Insurance Act (STIA)
 - Banks Act
 - The Companies Act
26. You agree that we and/or the Discovery Group may transfer your Personal Information outside the borders of the Republic of South Africa:
- 26.1. If you give us an email address that is hosted outside South Africa;
 - 26.2. To administer certain services, for example, cloud services; or
 - 26.3. Where required to administer any offshore product of the Discovery Group
- Attooh Consulting and/or the Discovery product provider and/or Discovery Group, will ensure that any company or person to whom we transfer your Personal Information are obliged to treat your information with the same level of protection as we are obliged to.
27. Should Attooh Consulting and/or the relevant Discovery product provider become involved in a proposed or actual merger, acquisition, or any form of sale of assets, we and/or such Discovery product provider has 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.

28. We may change this Privacy Statement at any time. An updated version will be available on request.
29. If you believe that we have used your Personal Information in a manner that may be contrary to this Privacy Statement, you have the right to lodge a complaint of first instance with Discovery Life as the license holder or with the Information Regulator. However, we encourage you to first follow our internal complaints process to resolve the complaint. Alternatively, please contact our offices. If, thereafter, you feel that we have not resolved your complaint adequately, kindly contact Discovery Life or the Information Regulator.

Attooh Consulting's contact details are:

Unit 1C, Menlyn Woods Office Park
291 Sprite Avenue,
Faerie Glen
0043
Tel: 012 368 9900
Att: Mr. Wouter Snyman
e-mail: wouter@attooh.co.za

Discovery Life as the license holder's details are:

1 Discovery Place
Sandton
2196
e-mail: privacy@discovery.co.za

The Information Regulator (South Africa)

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27 Stiemens Street
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