

1 Brolink's privacy assurance

Brolink is an Authorised Financial Service Provider with FSP number 10834 providing services in the South African short-term insurance industry. We have put in place suitable physical, technological and managerial measures in order to comply with the Protection of Personal Information Act No 4 of 2013 and to safeguard the privacy of the individuals we encounter in conducting our business.

2 What data do we collect?

We collect data mainly about policyholders but also about third party claimants and other parties. We do so in order to provide you with a quotation that you have requested from a broker or an insurer, or in order to perform our duties in connection with a contract. The data that we collect includes but is not limited to:

- General identification and contact information such as name, ID number, physical address, postal address, email address, telephone numbers, gender, marital status, date of birth and details of a driving licence;
- Financial information and account details, such as bank account numbers and premiums paid;
- Telephone recordings of conversations;
- Emails;
- Information related to the property insured, such as vehicle registration numbers, previous insurance and claims experience;
- Information relating to claims investigations, such as reports and photos.

The supply of such personal information is mandatory. If it is incomplete then we may not be able to process insurance-related transactions on your behalf.

3 How do we collect your data?

We collect personal information through:

- Our computer systems;
- Our web site;
- Insurance proposal forms;
- Claim forms;
- Telephone calls;
- Emails; and
- Social media.

Information about insurance policies is collected by brokers or insurers who use Brolink's insurance computer systems. Brolink does not ordinarily collect personal information directly from policyholders except where Brolink handles claims on behalf of insurers.

Brolink obtains credit rating information and additional personal information, either directly from a credit reference agency or the system of an insurer or broker.

Where Brolink handles claims on behalf of insurers, Brolink obtains personal information when claimants or third parties complete documents or forms, speak to one of Brolink's consultants, communicate with Brolink by email, or deal with Brolink's business partners or service providers such as loss adjusters.

4 How do we use your data?

We only collect personal information where it is reasonably necessary for our activities, including:

- Issuing and administering insurance quotations and policies;

- Collecting insurance premiums, for example via debit orders;
- Handling insurance claims;
- Performing statistical analysis on insurance portfolios;
- Resolving complaints;
- Complying with applicable laws and regulations such as the Financial Advisory and Intermediary Services Act.

We ordinarily process personal information on behalf of an insurer who is the Responsible Party as defined in the Protection of Personal Information Act. The name and address of the insurer is disclosed in your policy schedule.

5 How do we store your data?

The personal information of policyholders, claimants and/ or third parties is securely stored in Brolink's computer systems at different locations in South Africa.

6 Do we transfer your data outside the country?

Brolink does not transfer personal information outside the borders of South Africa.

7 How do we use your data for marketing?

Brolink does not use your personal information for marketing.

8 How do we share your data?

Brolink does not and will not sell personal information to any third party.

We follow common practice in the South African short term insurance industry by sharing personal information with various third parties. Depending on the specific insurance product such third parties include:

- Credit reference agencies so we can obtain information used for assessing risk and calculating insurance premium;
- Insurers, reinsurers, brokers and third party service providers (like loss adjusters) so Brolink can administer policies and handle claims;
- Banks so Brolink can collect insurance premiums and pay claims;
- Agencies who assist with fraud prevention;
- Other parties when we are required to do so by law or any regulatory authority.

When we outsource any processes we ensure that our service providers have appropriate security measures in place. All third parties are obliged to keep your personal information strictly confidential.

9 For how long do we keep your data?

Your personal information is stored for a minimum of five years as required by the Financial Advisory and Intermediary Services Act and/ or other legislation. We will take all reasonable steps to destroy or de-identify your personal information when the law no longer requires us to keep it.

10 How do we use cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect anonymous data about your interaction with our website from you in the form of cookies and IP addresses. No personal information, such as your name or email address, is required or stored in this process.

11 What are your data protection rights?

Every person whose personal information we process has the following rights:

- You have the right to request copies of your personal information, subject to the terms and conditions described in our Promotion of Access to Information (“PAIA”) manual which is available at our website www.brolink.co.za;
- You have the right to request that we correct any information you believe is inaccurate;
- You have the right to request that we erase your personal information, under certain conditions;
- You have the right to object to us processing your personal information, under certain conditions;
- You have the right to lodge a complaint with the Information Regulator whose contact details will be made available once the relevant legislation has been passed.

If you wish to object to the processing of personal information or if you wish to request for correction or deletion of personal information then please complete Form 1 or Form 2 at the end of this privacy notice.

12 How can you contact us?

Brolink’s aim is to always have accurate, complete, up-to-date and relevant personal information. Requests for access to and possible correction of personal information as envisaged by the Protection of Personal Information Act should be addressed to the party who collected that information from you, normally the broker or insurer.

General complaints should be handled according to the contact information that is shown on your policy schedule.

If you have direct dealings with Brolink then you may contact:

The Information Officer
Brolink (Pty) Ltd
Westend Office Park
254 Hall Street
Centurion
Telephone: 012 673 0000
Email: paia@brolink.co.za

13 When was this notice last updated?

This notice was last updated on 1 December 2020 and supersedes any previous privacy notice. We will publish any future versions to our website www.brolink.co.za.

**FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS
OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT,
2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2018**
[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number	
Residential, postal or business address:	
Contact number(s):	
	Code ()
Contact number(s)	
Fax number / E-Mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
Residential, postal or business address:	
Contact Number(s)	
	Code ()
Fax number / E-Mail address:	

FORM 2

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION
OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION
IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2018**

[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "X".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-Mail address:	

B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact Number(s)	
Fax number / E-Mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/ DESTROYED
D	REASONS FOR “CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this Day of 20.....

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Signature of data subject / designated person