

PRIVACY NOTICE

At Credit Guarantee Insurance Corporation of Africa Ltd we are committed to protecting your privacy and to ensure that the personal information relating to our clients, our client's debtors, our business partners and other data subjects who share their personal information with us, is collected and used properly, lawfully and transparently in compliance with the Protection of Personal Information Act.

This Notice explains how we obtain, use and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who we are
- What counts as 'personal information'
- What information we collect and from where we collect it
- The purposes for which 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, correction and deletion of information
- Changes to this Notice
- How to contact us
- The Information Regulator's contact details

WHO WE ARE

In this Notice, "CGIC" or "we" refers to Credit Guarantee Insurance Corporation of Africa Limited.

WHAT COUNTS AS 'PERSONAL INFORMATION'?

In terms of the Protection of Personal Information Act 4 of 2013 (the "Act"), personal information is data that can be used to identify a person. It is defined as "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This information about a person includes, but is not limited to:

- Race;
- Gender;
- Sex;
- Pregnancy;
- Marital status;
- National / ethnic / social origin;
- Colour;
- Sexual orientation;

- Age;
- Physical or mental health;
- Disability;
- Religion / beliefs / culture;
- Language;
- Educational / medical / financial / criminal or employment history;
- ID number and other identifying numbers;
- Email address;
- Physical address;
- Telephone number;
- Location;
- Biometric information; and
- Personal opinions, views or preferences.

THE INFORMATION WE COLLECT

We collect and process personal information in respect of our clients (policyholders), their debtors, our business partners, service providers and other data subjects to provide you with access to our services and products, to carry out actions for the conclusion or performance of our policies and to help us improve our offerings to you and for certain other purposes explained below. In order for us to do this, you must provide us with the information that we request, failing which we cannot enter into a relationship with you or assist you.

When you provide us with information about third parties (for example a client's debtors), we will process their personal information to pursue their legitimate interest in terms of providing trade credit insurance cover to clients, in respect of debts owed by their debtors. You warrant that when you give us personal information about third parties, this information is accurate and correct and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes. 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 on their behalf.

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.

We collect information directly from you where you provide us with your personal details, for example when you apply for a product or services from us or when you submit enquiries to us or contact us.

We also collect information, which may include credit, financial or criminal information about you from other sources such as:

- Third parties such as credit bureaus for the purposes of conducting credit reference checks, fraud prevention agencies and law enforcement agencies;
- Other insurers to prevent fraudulent claims.

We may also supplement the information that you provide to us with information we receive from other companies in the Old Mutual Group in order to offer you a more consistent and personalized experience in your interactions with CGIC and to ensure that we have updated information about you.

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 your personal information from you directly, and we would appreciate it if you would promptly notify us of any changes, to keep our records up to date and accurate. Clients can do so by logging on to CregaLink whenever your details change or by contacting the CGIC staff responsible for your Policy, as advised to you. Where we are unable to obtain personal information from you directly, we will make use of verifiable independent third party data sources.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. We will not associate any data gathered from this site with any personal information from any source. If we do want to collect personal information through our website, we will be upfront about this. Please see the Cookies Policy on our website for further information on this.

PURPOSES FOR WHICH WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected or agreed, which includes:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship;
- For maintaining the accuracy of your personal information;
- For the conclusion or ongoing performance of our insurance policies, including for underwriting purposes and to assess and process claims and any related recoveries or salvages;
- To conduct credit reference searches or verification;
- To confirm and verify your identity, address and banking details;
- 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 the detection and prevention of fraud, crime, money laundering or other malpractice;
- To provide underwriting opinions to international trade credit insurers where they have been asked to provide insurance cover on debtors in SA;
- For debt tracing or debt recovery;
- To trace you where you are uncontactable;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- Social responsibility; and
- 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 CGIC's interests).

We may also process information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies as well as to other entities in the Old Mutual Group if you are matched to one of these sanctions lists.

We may obtain and share information about your credit worthiness or the credit worthiness of any payer on a 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

ONGOING FINANCIAL SERVICES

Given our aim to provide clients 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.

If you do not want to receive such financial services information, you may opt out at any time if you no longer 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 privacy@cgic.co.za.

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:

- Third parties for the purposes listed above, for example credit reference, fraud prevention agencies and law enforcement agencies;
- Other insurers to prevent fraudulent claims; and
- 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;
- To carry out actions for the conclusion or performance of our insurance policies; and
- Where we believe it is necessary to protect our rights.

INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to prevent the loss of, damage to, unauthorised destruction and unlawful access or processing 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 personal information; and
- 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 wish 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.

YOUR RIGHTS

We will take all reasonable steps to confirm your identity when you exercise your rights.

Access to information

You have the right to request a copy of the personal information we hold about you. To do this, please contact us at privacy@cgic.co.za, complete Form C (available under the Privacy section on our website www.creditguarantee.co.za) and specify what information you would like access to.

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

Objection to processing

In certain cases you have the right to object to the processing of your personal information. If you want to object, please contact us at privacy@cgic.co.za, complete Form 1 (available under the Privacy section on our website www.creditguarantee.co.za) and specify what information you object to us processing.

Correction of your information

You have the right to ask us to update or correct your personal information. You may do this by contacting us at privacy@cgic.co.za.

Deletion of your information

You agree that we may keep your personal information until we destroy your information based on CGIC's destruction standards. You have the right to ask for deletion or destruction of your PI – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may do this by contacting us at privacy@cgic.co.za, complete Form 2 (available under the Privacy section on our website www.creditguarantee.co.za) and specify what information you would like us delete.

Automated decision making

You agree that we may process your personal information by 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, or the application.

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.

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, please contact us at privacy@cgic.co.za.

INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are:

Website: <http://www.justice.gov.za/inforeg/index.html>

General enquiries: inforeg@justice.gov.za

Email: complaints.IR@justice.gov.za