

Privacy Statement

This privacy statement sets out how Roadcom TopTrans (Pty) Ltd uses, discloses and protects any personal information that you provide or that we collect, when you use our website or that we collect directly from you.

We collect personal information to be able to provide you with adequate insurance cover based on your own risk profile and to ensure that we have the correct and most up to date information.

“Personal Information” means information relating to an identifiable, living, natural person and where applicable, an identifiable, existing juristic person.

This privacy statement describes how we handle Personal Information that we collect from completed proposal forms, claim forms, telephone calls, e-mails and other communications with us, as well as from third parties involved in our business dealings with you.

We are committed to ensuring that your personal information is protected. If we ask you to provide certain information by which you can be identified when using this website, it will only be used in accordance with this privacy statement. If you do not wish to provide personal information to us then you do not have to do so, but it may affect your use of this website or the products and services offered on it.

Roadcom TopTrans (Pty) Ltd recognises the importance of protecting your personal information and as such subscribes to the principles, outlined in applicable privacy law that governs your right to having your personal information kept private.

Collection of personal information

Personal information will be collected from yourself via our accredited short-term insurance broker market, except if:

- (a) Your personal information is contained in a public record or has deliberately been made public by yourself;
- (b) You have consented to the collection of the information from another source;
- (c) The collection of the information from another source would not prejudice your legitimate interest;
- (d) Where the collection of the information from another source is necessary—
 - (i) to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - (ii) to enforce a law imposing a pecuniary penalty;
 - (iii) to enforce legislation concerning the collection of revenue as defined in tax legislation;
 - (iv) for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
 - (v) in the legitimate interests of national security; or
 - (vi) to maintain the legitimate interests of the responsible party or of a third party to whom the information is supplied;

(e) Compliance would prejudice a lawful purpose of the collection; or

(f) Compliance is not reasonably practicable in the circumstances of the particular case.

Depending on your relationship with us (for example, as a consumer policyholder; non-policyholder insured or claimant; witness; commercial broker or appointed representative; or other person relating to our business), Personal Information collected about you may include:

- Your name.
- Address.
- ID numbers.
- e-mail and telephone details.
- gender.
- date of birth.
- registration numbers.
- financial information and banking details such as account numbers.
- relationship to the policyholder, insured or claimant.

In certain cases, we may receive sensitive/special personal information about. In addition, we may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs).

How we use your personal information

We may use your Personal Information to:

- Communicate with you and others as part of our business.
- Make decisions about whether to provide insurance; provide insurance and assistance services, including claim assessment, processing and settlement; and, where applicable, manage claims disputes.
- Process your premium and other payments.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- Carry out market research and analysis, including satisfaction surveys.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.
- Comply with applicable laws and regulatory obligations such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities.
- Establish and defend legal rights; protect our operations or those of any of our group companies or insurance business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.

Sharing your personal information

Roadcom TopTrans (Pty) Ltd does not and will not sell or provide your personal information to third parties for independent use. We may, however, share your personal information with our business partners if that information is required to provide the product or service you have requested. However, our business partners will adhere to using your information only as directed by Roadcom TopTrans (Pty) Ltd

The following list includes but is not limited to some of the instances when we disclose the personal information obtained from you:

- When any regulatory authority for the various financial sectors requests same;
- To comply with any regulation passed under relevant legislation, or any legal process;
- To enforce and protect our rights and property (including intellectual property) and/or where we have a legitimate interest to do so;
- When you have expressly authorised us to do so; or
- If we undergo a change in ownership.

Roadcom TopTrans (Pty) Ltd may make Personal Information available to:

Assessors: Only Vehicle details in case of a claim

Legal Practitioners: All details will be made available where we have any claims pending.

Otherwise under no circumstances will we make your personal information available to any other third parties, unless required to do so by applicable legislation.

Roadcom TopTrans (Pty) Ltd are responsible for the management and security of jointly used Personal Information. Access to Personal Information within Roadcom TopTrans (Pty) Ltd is restricted to those individuals who have a need to access the information for our business purposes:

- **Other insurance and distribution parties**
In the course of marketing and providing insurance, and processing claims, Roadcom TopTrans (Pty) Ltd may make Personal Information available to third parties such as other insurers; and other intermediaries and agents; appointed representatives; affinity marketing partners; and other business partners.
- **Our service providers**
External third-party service providers, such as experts, lawyers and other outside professional advisors; third-party claim administrators; claim investigators and adjusters; and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.
- **Governmental authorities and third parties involved in court action**
Roadcom TopTrans (Pty) Ltd may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and/or that of our group companies, you or others; and (g) to allow us to pursue available remedies or limit our damages.
- **Other Third Parties**
We may share Personal Information with attorneys, panel beaters, assessors, other insurers with respect to recoveries and the like, to check information provided, and to detect and prevent fraudulent claims, Personal Information (including details of injuries) may be put on registers of claims and shared with other insurers. We may search these registers when dealing with claims to detect, prevent and investigate fraud.

Protecting your personal information

To help protect the privacy of data and personally information you transmit through use of the Captive website, we maintain physical, technical and administrative safeguards. We update and test our security technology where required on an ongoing basis. We restrict access to your personally identifiable information to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Roadcom TopTrans (Pty) Ltd will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), please immediately notify us. (See the "*Who to Contact About Your Personal Information*" section below.)

When Roadcom TopTrans (Pty) Ltd provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

Retention of your personal information

Roadcom TopTrans (Pty) Ltd takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this privacy statement. Roadcom TopTrans (Pty) Ltd will retain Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

URL AND IP ADDRESS

Like many other Web sites, we collect information about our users' utilization and navigation of our website. This information helps us to design our website to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

COOKIES AND WEB BEACONS

The Captive website uses cookies and web beacons to provide enhanced functionality on the site (e.g., user ID and password prompts, and conference registration) and aggregate traffic data (e.g., what pages are the most popular). These cookies may be delivered in a first-party or third-party context. Roadcom TopTrans (Pty) Ltd may also use cookies and web beacons in association with e-mails delivered by Roadcom TopTrans (Pty) Ltd Our website also captures limited information (user-agent, HTTP referrer, last URL requested by the user, client-side and server-side clickstream) about visits to our website; we may use this information to analyse general traffic patterns and to perform routine system maintenance. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser.

Inapplicability of Privacy Statements of Any Linked Sites or Other Third Parties

This Privacy Statement only addresses Roadcom TopTrans (Pty) Ltd 's use and disclosure of your personally identifiable information. We encourage you to be aware that when you go to another Web site you should carefully read their privacy statement.

General Legal Notice and Disclaimer

References herein to any product, process or service do not constitute or imply endorsement or recommendation by Roadcom TopTrans (Pty) Ltd While Roadcom TopTrans (Pty) Ltd makes every effort to present accurate and reliable information on our website, Roadcom TopTrans (Pty) Ltd does not approve or certify such information nor does it guarantee the accuracy, completeness, efficacy, timeliness or correct sequencing of such information. Use of such information is voluntary and reliance on it should only be undertaken after an independent review of its applicability, accuracy, completeness, efficacy and timeliness with regard to financial services providers specific needs and uses. Roadcom TopTrans (Pty) Ltd (including its employees and agents) is not responsible for, and expressly disclaims all liability for, damages of any kind arising out of the use, reference to or reliance on the information available through our website. No approvals, recommendations, endorsements, guarantees or warranties, including, but not limited to, any express or implied warranties of merchantability or fitness for any particular use or purpose of products or services named on our website are made by Roadcom TopTrans (Pty) Ltd

Your Access to and updating of Personal Information.

Reasonable access to personally identifiable information will be provided within a reasonable period at no cost upon request made to Roadcom TopTrans (Pty) Ltd at the contact information provided below. If access cannot be provided within that time frame, Roadcom TopTrans (Pty) Ltd will provide the requesting party a date when the information will be provided. If for some reason access is denied, Roadcom TopTrans (Pty) Ltd will provide an explanation as to why access has been denied.

Conditions of Use, Notices and Changes to Our Privacy Statement

By using our website, you agree to the terms and conditions contained in this Privacy Statement and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use this Site or any Roadcom TopTrans (Pty) Ltd benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Statement and Conditions of Use, or any other agreement we have with you, will be governed by the laws of South Africa. You also agree to arbitrate such disputes in South Africa, and to abide by any limitation on damages contained in any agreement we may have with you.

As our organisation and benefits change from time to time, this Privacy Statement and Conditions of Use is expected to change as well. We reserve the right to amend the Privacy Statement and Conditions of Use at any time, for any reason, without notice to you, other than the posting of the amended Privacy Statement and Conditions of Use at this website. We may e-mail periodic reminders of our notices and terms and conditions and material changes thereto, but you should check our website frequently to see the current Privacy Statement and Conditions of Use that are in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of our website.

Questions Regarding the Privacy Statement and Conditions of Use

If you have any questions about our Privacy Notice Statement and Conditions of Use, or any concern about privacy at Roadcom TopTrans (Pty) Ltd or the use of this Site in general, please contact our Information Officer by e-mail at: tammy@toptrans-uma.co.za

This policy is effective from 30th June 2021.