



A LIFE WELL LIVED

MHA MANAGEMENT HOLDINGS (PTY) LTD

FSP No: 10134



NATIONAL HEALTH BENEFITS (PTY) LTD

FSP No: 5070

NHB ADMINISTRATORS (PTY) LTD

FSP No: 11314

(collectively referred to as “MHA”)

Policy Name

PRIVACY AND SECURITY POLICY




Version Number

01/2021

Policy Sponsor

Legal, Risk and Compliance

Approval process

MANAGER/ COMMITTEE	NAME	SIGNATURE	DATE
HEAD OF LEGAL RISK AND COMPLIANCE	STEPHAN GROENEWALD		31/05/2021
EXECUTIVE DIRECTOR/KEY INDIVIDUAL	BEVERLEY REEB		31/05/2021
MANAGING DIRECTOR / KEY INDIVIDUAL	MICHAEL METLITZKY		31/05/2021

1. PURPOSE

Privacy and confidentiality is important to MHA and personal information is dealt with in terms of MHA's Privacy and Security Policy. This privacy and security policy outlines MHA's practices and commitment to all its stakeholders in this regard. MHA takes all reasonable steps to ensure that it aligns its business practices with the terms of this policy.

MHA collects, holds, uses and discloses ('processes') information about individuals which may constitute personal data (including sensitive personal data) under the Protection of Private Information Act ("POPIA"). By providing MHA with personal data (including sensitive data), it is accepted that personal data be processed by MHA for the purposes described in this policy.

This policy aims to ensure that personal data is processed in a responsible and secure manner to ensure privacy and confidentiality thereof.

2. ORGANISATIONAL SCOPE

The policy fits within the Compliance Management Framework. All stakeholders of MHA are affected by the Privacy and Security Policy.

The Legal Risk and Compliance Department is responsible to implement the policy, to monitor compliance therewith, and to report thereon.

3. POLICY STATEMENT, PRINCIPLES AND GUIDELINES

3.1 Use of information

MHA values its stakeholders, and as such, is committed to respecting and maintaining personal information confidential and to keep such information secure. MHA will use all personal information to enhance its clients' experiences, the service that MHA provides and to communicate with its clients, unless expressly directed by its clients not to do so. MHA will therefore treat all personal information as private and confidential and undertake to deal with all information in a responsible and lawful manner.

MHA will take all reasonable steps to prevent unauthorised access to personal information in its possession and to which it has access to. Kindly note that MHA will only request personal information required for the purposes of assessing and providing its clients with an insurance policy. This information is essential to conclude agreements and comply with its legal and regulatory obligations. MHA will further only process personal information for purposes consistent with the normal course of its business to uphold its legitimate interests.

MHA is required by law, to process and maintain all personal information in accordance with prescribed standards or generally accepted information management practices (including prescribed retention periods) to ensure that your information is complete, accurate, up to date and secure.

3.2. Personal information

In general, anyone may visit MHA's website without revealing any personal information. There are times, however, when MHA or its partners may request personal information. If requested, you may choose to give us your personal information, for example your name and address or email addresses. This information may be needed, for example, to correspond with you, to process a request, or to provide you with a quote or with information.

MHA will advise you how it will use personal information before it collects the personal information from you. If you inform MHA that you do not want it to use your personal information as a basis for further contact with you or for any other purpose, it will not do so.

3.3. Technology, security and quality of information on the Website

MHA intends to protect the quality and integrity of personal information. To prevent unauthorised access, maintain data integrity and ensure the appropriate use of information, MHA has established appropriate physical and technological protocols to safeguard the personal information provided to it. MHA will update and enhance these measures on an ongoing basis, to ensure they remain appropriate and relevant.

However, MHA cannot guarantee the security of any information transmitted to it online and parties do so at their own risk.

MHA will make commercially reasonable efforts to respond to requests to correct inaccuracies in your personal information in a timely manner. To assist MHA in correcting inaccuracies in personal information, stakeholders are requested to kindly return messages containing the inaccuracies to MHA with details of the correction requested.

MHA has deployed appropriate technology and implemented security measures to protect against the loss, misuse or alterations of the information under its control, by unauthorised third parties. MHA is committed to providing and developing secure online services.

As such, all interactions with MHA's transactional site, are protected through encryption that complies with international standards. MHA has implemented data encryption to protect your data and secure your transactions. Encryption is used to protect the transmission of your personal information when transacting with MHA.

MHA's internet servers are protected by firewalls and intrusion detection systems. Access to information on these servers is restricted to authorised personnel only. The MHA user database is backed up on a regular basis, and its services do not allow anonymous or otherwise unauthenticated access at any time.

MHA regularly tests the effectiveness of the security of its systems and responds to any threats that may be detected.

Of course, no data transmission over the internet can be guaranteed 100% secure, and MHA does not warrant that your information will be secure.

3.4. Information collection

To monitor and improve the website, MHA may use technology to gather information about your use of the website including details of operating system, browser version, domain name, and IP address (the IP address is a string of numbers that tells us which server you are using but does not identify you).

The process of gathering the information as described immediately above uses a technology known as “cookies”. Cookies are small pieces of data that allow the MHA web server to recognise users on the website. Cookies are issued by a specific web server, stored in the users web browser and can only be read by the issuing server.

Apart from merely establishing basic connectivity and communications, MHA may use this data in aggregate form to develop customized services that may be tailored to individual interests and needs. MHA will use cookies to save email and username so website users, don't have to re-enter it each time they visit the site. MHA may also use cookies to customise website users' preference settings for future return visits. This is also to facilitate speedy service to clients, and enhances experience on the website. At no point in time will any of the personal information be stored in a cookie.

Should a website user choose to do so, it is possible (depending on the browser being used), to be prompted before accepting any cookies, or to prevent the browser from accepting any cookies at all. This may however cause certain features of the website not to be accessible. If a user does not wish us to collect the information the browser should allow the disablement of cookies.

3.5. Sharing of information

MHA will not sell, rent, or trade any personal information to any third party. As a result of its relationship with the MHA product suppliers, intermediaries and service providers, MHA will be sharing with them information about its clients. MHA may also share information within MHA. MHA will disclose information when lawfully required to do so to comply with any relevant legislation, or any legal process; and by any regulatory authority (like the Financial Sector Conduct Authority) and the Regulators it may appoint for the various financial sectors.

Sometimes MHA may share aggregated information (for example, demographic data) with its stakeholders and business partners, but it will not disclose personal information to third parties save with personal consent or as provided in this privacy statement. MHA will never sell email addresses to third parties for purposes of email spamming. If a stakeholder has agreed to this, MHA may use personal information to send information on new services or products that may be of interest to the stakeholder, and from time to time will mail, email or SMS information about

MHA, its products and services, or to its partners and their products or services. If at any time you do not wish to continue receiving this information, you may contact MHA and we will remove you from the mailing list.

MHA may be required to disclose person information for matters of public interest (e.g. to assist in the prevention of crimes). Before complying with these requests, MHA will take every precaution to ensure the authorities involved have legitimate grounds to make such a request.

MHA may process and disclose personal information, for statistical purposes, that does not relate to any person specifically (i.e. de-identified information) as it deems appropriate.

3.6. Collection of information by third parties

Owners or information system administrators of third party websites that have links to the MHA website may collect personal information about MHA when they use these links. While MHA tries to link only to sites that share our high standards and respect for privacy, MHA is not responsible for the content or the security or privacy practices employed by other sites. MHA encourage all stakeholders to read the privacy policy for any site that requests personal information.

3.7. Clickstream data

MHA may collect anonymous information from visitors to its websites to help it provide better customer service. For example, MHA keeps track of the domains from which people visit its website and also measures visitor activity on its website. In doing so MHA ensures the information cannot be used to identify users. This information is sometimes known as "clickstream data". MHA or its analytic vendors may use this data to analyse trends and statistics and to help it provide better customer service. If you do not wish your personal information to be used in this way, users are kindly requested to notify MHA.

3.8. Online advertising

MHA engages third parties that help it deliver its banner advertisements and other online communications. The third parties may collect and use information about MHA customers to help them understand the offers, promotions, and types of advertising that are most appealing to its customers. The personal information they collect is aggregated and cannot be linked to a person. If you do not wish your personal information to be used in this way, kindly notify MHA.

3.9. Personalised URL link

On occasion, a personalised URL (link) is displayed on the MHA website that directs a visitor to a personalised web page. The personal URL is readily identifiable and may result in the

disclosure of personal information. By clicking on that link and accessing a personal web page the user agrees to allow MHA to collect information about the session visits. MHA may use this information to help it provide the user with information that matches the user's interests. If you do not wish your personal information to be used in this way, kindly notify MHA.

3.10. Children

If any, of MHA's websites are directed towards children, MHA is committed to comply with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

3.11. Interception of Communications

Subject to the provisions of the Regulation of Interception of Communications (RIC) Act 70 of 2002, the user of the website hereby agrees to MHA's right to intercept, block, filter, read, delete, disclose and use all communications sent or posted by the user to the website, its staff and employees. You agree and acknowledge that the consent provided by you, herein, satisfies the "writing" requirement as detailed in the ECT Act and the RIC Act.

3.12. Updates

This privacy statement was last updated in May 2019. MHA reserves the right to amend or modify its Privacy and Security Policy at its sole discretion, at any time, without any prior notice to the user, in response to meeting legislative requirements and dynamic business needs. All amendments to the policy will be posted on the website.

4. Legislative Compliance

MHA is required to manage its policy documentation within a legislative framework. The following legislation is relevant to this policy:

- Constitution of the Republic of South Africa Act 108 of 1996
- Electronic Communications and Transactions Act no 25 of 2002
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications (RIC) Act 70 of 2002

5. References

PAIA Manual

6. Approval structures

Approval required by Board of Directors. Authority has been delegated to Executive Management. The implementation of this policy shall be in terms of the aforesaid level of authority, and the policy shall be signed off by Executive managers.

7. Policy Sponsor

Head of Legal Risk and Compliance.

8. Contact Person

The following person may be contacted in relation to this policy:

Stephan Groenewald

Head of Legal Risk and Compliance

stephan@nhb.co.za