

## PRIVACY NOTICE

### About us

For us to provide our clients with financial products and services We need to collect, use, share and store personal and financial information about you. This privacy notice aims, among other things, to inform you about how Navigate Underwriting Managers (Pty) Ltd (Navigate) undertakes to keep your personal information secure when providing you with financial products and services. This information includes information you share with us, information that we gather during our relationship with you as a client, and information that we may collect from the public domain (the internet and your social media accounts). This notice also sets out your rights and how you may protect them.

### What personal information do we collect and how?

Personal information is data that can be used to identify you. This information includes but is not limited to:

- Your name.
- Risk address.
- Risk location.
- ID numbers.
- E-mail address.
- Telephone number/s.
- VAT number.
- Bank account numbers and banking details.
- date of birth.
- registration numbers.
- employment history, skills, and experience.
- Next of Kin name and contact details

### We collect your personal information in the following ways:

- Directly from you when you complete a product application form, whether electronically or on hard copy.
- Indirectly from you when you interact with us electronically. When you are browsing our website, we may collect information from you, such as your internet address and server logs.
- From your broker who has an intermediary agreement with us.
- Directly from other sources, such as public databases.

### How we use your personal information

We may use your Personal Information to:

- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies, other terms and conditions, our website and other administrative information.
- Make decisions about whether to provide insurance; provide insurance and assistance services, including claim assessment, processing, and settlement; and, where applicable, manage claim disputes.
- 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.
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.

- Identify you to anyone to whom you send messages through our website.
- 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 insurance business partners, our rights, privacy, safety, or property, you or others; and pursue available remedies or limit our damages.
- To detect and prevent fraud and crime.
- To detect and prevent money laundering.
- To meet our obligations under an agreement with you.

We may record and monitor any communications between you and us and use these to verify your instructions to us, to analyse, assess and improve our services to clients, and for training and quality purposes.

We will not sell your information to third parties and will only market to you in accordance with our legal obligations and your marketing preference, using the communication method you chose.

We may communicate with you by post, phone, SMS, email and other electronic media, about products that may be of interest to you. You may ask us to stop or start sending you marketing messages by informing us in writing.

It is your right to refuse to provide personal information, but you must keep in mind that this refusal may limit our ability to provide the required financial services to you.

We will not use information collected about you for marketing purposes you have not consented to.

Should We make use of third-party data providers, we will ensure that such providers have obtained the required consent to share the information with Navigate.

#### **To whom will we disclose your information?**

We will disclose your personal information to third parties only under the following circumstances:

- We have your consent to do so.
- We are required to do so by law.
- It is necessary to protect our legitimate interest, your legitimate interest, or the legitimate interest of a third party to whom the information is supplied.
- It is in the public interest to do so.
- We must meet tax reporting requirements.
- We are ordered to do so by a court of law.

Protecting Navigate's interests may sometimes require the disclosure of specific client information to third parties.

#### **Security**

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect.

We take every reasonable precaution to protect your personal information from theft, unauthorised access, and disruption of services. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centres, systems, and other assets for security vulnerabilities.

## **Retention**

We will retain your information only for as long as we need it, given the purpose for which it was collected, or as required by law (including tax legislation) and any other statutory obligations (including anti-money-laundering and counter-terrorism requirements). Your information may be retained for varying periods from the end of our relationship, depending on regulatory requirements.

We will take all reasonable steps to destroy or de-identify the personal information that we hold when it is no longer required, should we retain your personal information for historical, statistical or research purposes.

## **Cookies**

We make use of cookies to personalise your repeat visits to our website by determining how you use the site. Cookies are very small text files that may be stored on your computer or mobile device when you visit a website, enable images, or click on a link in an email.

We use cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to meet your needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Your Access to and updating of Personal Information.**

Reasonable access to personally identifiable information will be provided within 30 days at no cost upon request made to Navigate at the contact information provided below. If access cannot be provided within that timeframe, Navigate will provide the requesting party a date when the information will be provided. If for some reason access is denied, Navigate will provide an explanation as to why access has been denied.

## **Conditions of Use, Notices and Changes to Our Privacy Statement**

By using this Site, you agree to the terms and conditions contained in this Privacy Notice 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 of our 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 organization, and benefits change from time to time, this Privacy Notice and Conditions of Use is expected to change as well. We reserve the right to amend the Privacy Notice and Conditions of Use at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice and Conditions of Use at this Site. You should check our Site frequently to see the current Privacy Notice 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 this Site.

## **Questions Regarding the Privacy Notice and Conditions of Use**

If you have any questions about our Privacy Notice and Conditions of Use, or any concern about privacy at Navigate or the use of this Site in general, please contact us by e-mail at [privacy@navigateum.com](mailto:privacy@navigateum.com)