Sanlam's Privacy Notice

This Privacy Notice describes how the Sanlam Group collects, uses, discloses, retains and protects your personal information, in accordance with the Data Protection Act of 2021 and other relevant laws. The Privacy Notice applies to any website, application, form, document, product or service which references this Privacy Notice. It also supplements any other privacy policies which may apply in respect of a Sanlam Group entities' processing of personal information.

The Data Protection Act defines personal data as "data which relates to an individual who can be directly or indirectly identified from that data which includes a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Please note that this Privacy Notice may previously have been referred to on this website as a 'privacy policy' or 'privacy statement' and therefore some documents or forms may still refer to this Privacy Notice as a 'privacy policy' or 'privacy statement'.

Who we are

In this Privacy Notice, any reference to "Sanlam", "the Sanlam Group" or "we" refers to one or more of the entities, affiliates or subsidiaries of the Sanlam Limited Insurance Group.

How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you **when you complete a product or service application form, electronically, telephonically or by way of a hard copy**;
- Indirectly from you **when you interact with us electronically by way of our website, apps, or social media channels**, which may include the collection of metadata (data about data);
- From retirement funds, employers and other **contracted entities in the context of group insurance policies**; and
- Where relevant, from **third party sources**, such as other entities within the Sanlam Group, financial intermediaries that are representatives of Sanlam Group entities or have intermediary agreements with Sanlam Group entities, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies.

We will also collect your information where you have only partially completed and/or abandoned any information which you began to apply to our website and/or other

online forms. Given that we already consider you a customer at this stage, we may use this information to contact you in order to remind you to complete outstanding information.

Where we require personal information in order to provide you with our products and services, your failure to provide us with the necessary information, will result in the Sanlam Group being unable to provide you with our products and services. You are responsible for informing the Sanlam Group if your information changes.

Collection of information by third parties

Owners or information system administrators of third-party websites that have links to the Sanlam website, may collect personal information about you when you use these links. Sanlam does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. Sanlam does not accept any responsibility or liability for third party policies or your use of a third-party app, platform or service.

Sanlam also uses certain social networking services such as Facebook, WhatsApp, Instagram and X (former Twitter) to communicate with the public and Sanlam clients. When you communicate with Sanlam through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies which are independent of Sanlam's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

Sanlam will only provide data to third party information exchange services, for example The Financial Services Exchange (Pty) Ltd, trading as Astute, with your consent.

What information we collect

Your relationship with Sanlam determines the exact nature of the personal information Sanlam processes, and the purpose for which such personal information is collected and used. However, in many cases, if we are handling your personal information as part of our role as an insurer, the personal information we may process includes the following:

- Information about you – for example your name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, current status of health, medical history and any existing conditions of each person insured. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties. We acknowledge that information about your health is special personal information. Note that we will use that information strictly in accordance with applicable laws and for insurance

purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).

- Contact information – in some cases, for example, we may receive your email, address, phone number and postal address.

- Online information – for example cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.

- Financial information – we may process information related to payments you make or receive in the context of an insurance policy or claim. We may process information regarding your income, expenses, assets, liabilities, investments, retirement and other financial provisions in the context of providing financial advice and intermediary services.

- Contractual information – for example details about the policies you hold and with whom you hold them.

- Health information such as smoker status or medical related issues relevant to a policy or a claim you have made.

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of your personal information where consent is not required.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

How we use your information

We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner and/or controlling persons. **We are also required by various laws to maintain a record of our dealings with clients.**

In order for us **to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, we need to collect, use and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.**

To the extent permissible under applicable laws, Sanlam may use your information:

- To provide you with our financial products and services, and maintain our relationship with you;
- To provide you with financial advice and intermediary services;
- To conclude and administer your application, which may include underwriting;
- To execute a transaction in accordance with your request;
- To assess, check, and process claims;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- In relation to administering any securities you may hold in respect of a Sanlam Group entity (where relevant);
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the Financial Intelligence Centre and Pensions and Insurance Authority);
- To undertake credit reference searches and/or verification;
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of Sanlam Group policies;
- Debt recovery or debt tracing;
- For purposes of online login and authorisation;
- To execute the Sanlam Group's strategic initiatives;
- Perform any risk analysis or for purposes of risk management to you or our business in general;
- Record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention
- To maintain the security of our digital channels and systems;
- For statistical analysis and research purposes;
- For audit and record keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with the Sanlam Group and to help us improve our offerings to you;
- To share with other entities in the Sanlam Group, so that we can market our financial products and services which we deem similar, with the aim of offering you the opportunity to take up some of the financial products to fulfil your needs, provided that you have not objected to receiving such marketing;
- Conduct market research and provide you with information about our products and services from time to time via email, telephone or other means (for example invite you to events);
- Process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- Prevent or control the spread of any disease and
- For any purpose related to and compatible with the above.

Sharing your information

Entities within the Sanlam Group will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to the following entities:

- Our third party service providers and other Sanlam Group entities who are involved in the delivery and/or administration of financial advice products and services;
- Other third parties in relation to the purposes set out under the previous section (How we use your information);
- Other insurers, public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention; and
- Reinsurers who provide reinsurance services to Sanlam and for each other. Reinsurers will use your personal information to decide whether to provide reinsurance cover, assess and deal with reinsurance claims, and to meet legal obligations.

Sanlam will process and share your personal information with other companies within the Sanlam Group for the purpose of facilitating your membership to a loyalty or rewards programme. Your personal information may also be shared with third-party suppliers from time to time for the purpose of facilitating and providing benefits to you by way of a loyalty or rewards programme or when needed to fulfil our contractual obligations to you.

Sanlam will not *sell, rent, or trade your personal information to any third party*. Sanlam will share information about you with financial advisers that are Sanlam representatives or have intermediary agreements with Sanlam. Sanlam may also share information within the Sanlam Group where it is in Sanlam's legitimate interest to do so.

Sanlam will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Financial Intelligence Centre or Pensions and Insurance Authority).

On occasion, Sanlam may – for legitimate purposes - share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, Sanlam will not disclose your personal information to third parties unless there is valid processing ground as set out in the Data Protection Act.

Transfer across borders

Some of the persons to whom we disclose your personal information may be situated outside of the Zambia in jurisdictions that may not have similar data protection laws to

Zambia. In this regard, we may send your personal information to service providers outside of Zambia for storage or processing on Sanlam's behalf. However, we will not send your information to a country that does not have information protection legislation similar to that of the Zambia, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with the Data Protection Act.

Security and storage of information

Sanlam intends to protect the integrity and confidentiality of your personal information. Sanlam has implemented appropriate technical and organisational information security measures (including, but not limited to, using encryption for transmission of credit card numbers) to keep your information secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Right of access to information

The Data Protection Act offer an individual the right to access information held by a public or private body in certain instances.

Correction of your information

In accordance with Data Protection Act, you have a right to correct any of your personal information held by Sanlam.

Objection to processing of your information

In accordance with the Data Protection Act, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

Marketing

Where you provide your personal information to a Sanlam Group entity in the context of a sale of one of our products or services, you agree to such Sanlam Group entity sending you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt-out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from Sanlam at any time by contacting the Sanlam Customer Care on 0211 257713-15, WhatsApp +260966250706 or 7549 SANLAM Toll Free line.

Where you choose to exercise your right to opt-out of direct marketing, please allow up to 21 days for Sanlam to effect that change.

Clickstream data

In the interests of better customer service, Sanlam may collect anonymous information from visitors to its websites. For example, Sanlam keeps track of the domains from which people visit its website and also measures visitor activity on its website. In the process, Sanlam ensures the information cannot be used to identify you. This information is sometimes known as "clickstream data". Sanlam or its analytics vendors (including Google Analytics) may use this data to analyse trends and statistics and to provide better customer service.

The information, referred to as traffic data, which may be collected includes:

- Your IP address;
- The search terms you have used;
- The pages accessed on the website and the links you’ve clicked on;
- The date and time you visited the website;
- The referring website (if any) through which you clicked through to our website; and
- The type of website browser you use.

As mentioned, the **traffic data is aggregated and not personally identifiable and our website analysis will also respect any ‘do not track’ setting you might have on your web browser.**

Cookies

A cookie is a small text file that is downloaded onto ‘terminal equipment’ (e.g. a computer or smartphone) when you access a website. It allows the website to recognise your device and store some information about your preferences or past actions.

What cookies do we use?

Some cookies which we use are essential to the functioning of our website. Some cookies help us with the performance and design of our website. This allows us to measure how many times a page has been visited, whether a page has been visited on the website through an advertisement or by other means. Other cookies help us to remember your settings which you may have selected or assist with other functionality when you browse and use our website. This helps us to remember what you have selected, so on your return visit - we remember your preferences. On certain pages of the website, we use cookies to help us understand your interests as you browse the internet, so we can tailor and render to you more personalised content and services in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third-party sites.

In addition, we also use cookies on certain pages of our website to communicate with third-party data suppliers in order to extrapolate your digital behaviour. This helps us to understand and target more relevant advertising in the future. The information we receive is all aggregate and anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle.

How do I disable cookies?

If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the website. For example, you will not be able to benefit from automatic log-on and other personalisation features.

Children

While few, if any, of Sanlam's websites are directed towards children, Sanlam is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

Updates

This privacy statement was last updated on 12 May 2021. A notice will be posted on the Sanlam website home page whenever the Privacy Notice is materially changed.

Please check the website regularly to ensure that you are aware of the latest version of this Privacy Notice.

Questions regarding this statement

Questions, comments and requests regarding this statement may be directed to life@sanlam.co.za for clarification.

Particulars of Sanlam

Should you have a complaint or concern regarding the processing of your personal information, your complaint may be submitted to email: CustomerCare@zm.sanlam.com or call 0211 257713-15, WhatsApp +260966250706 or 7549 Toll Free line.

Sanlam Limited is the controlling company of the Sanlam Limited Insurance Group.

Sanlam Life Insurance Zambia Limited is a licensed insurer and financial services provider.

Our head office's registered address is Lubuto House , Plot no. 1278 corner of Lubuto and Lungwebungu roads, Rhodespark.

For more information on the Sanlam Group, please visit our website.

The Information Regulator

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Data Protection Commissioner, whose contact details are:

The Data protection Commissioner
Maxwell House Annex Building, Los Angeles Boulevard, Longacres, Lusaka.