



SHIELD LIFE[®]
LIMITED
YOUR SHIELD FOR LIFE

PRIVACY NOTICE

SHIELD LIFE[®] LTD

Introduction

This is the website of Shield Life[®] Limited, "Shield Life", a public company registered in the Republic of South Africa.

It's important to Shield Life, to help our customers retain their privacy when they take advantage of all the Internet has to offer.

We believe your business is no one else's. Your privacy is important to you and to us. So, we'll protect the information that you share with us. In protecting your privacy, Shield Life follows different principles in accordance with worldwide practices for customer privacy and data protection.

Shield Life is committed to keeping your personal information confidential. Shield Life will use your personal information to enhance your experience, the service that Shield Life provides to you and to communicate with you, unless expressly directed by you not to do so.

This policy is applicable to, but not limited to:

- Website: <https://www.shieldlife.co.za>
- Application forms
- Claim applications
- Product & Services we render
- Company Documents

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

Purpose

Shield Life[®] is dedicated to the fundamentals of protecting consumer privacy and as such has created this Privacy Notice to standardise information privacy and data protection practices across all its business operations.

This Policy sets out how Shield Life[®] Ltd (hereinafter referred to as "Shield Life") operates in South Africa and how Shield Life[®] uses and protects the Personal Information that it collects, stores, processes and disseminates from and to its Data Subjects.

Definitions

Terms used in this Notice:

<i>Child</i>	Means a person under the age of 18 (eighteen).
<i>Data Subject</i>	Means all persons whose Personal Information Shield Life® and/or the Authorised Third Parties Processes, including all customers, employees, shareholders, suppliers, service providers and any other natural or juristic persons.
<i>Personal Information</i>	Means information (whether oral, written or in electronic form) relating to any Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's - <ol style="list-style-type: none">race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;education, medical, financial, criminal or employment history;names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a data subject, account or client number, password, pin code, customer code or number, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, e-mail address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;blood type, fingerprint or any other biometric information;personal opinions, views or preferences;correspondence that is implicitly or expressly of a personal, private, or confidential nature (or further correspondence that would reveal the contents of the original correspondence); andcorporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person) irrespective of whether such information is in the public domain or not;
<i>Information Officer</i>	Means the Shield Life® Information Officer, who can be contacted at mail to: privacy@shieldlife.co.za
<i>Process, Processing</i>	Means any operation or activity or any set of operations concerning Personal Information, whether automated or not and including - <ol style="list-style-type: none">the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; ormerging, linking, blocking, degradation, erasure or destruction;
<i>Data Protection Legislation</i>	means the Protection of Personal Information Act 4 of 2013, the Electronic Communications and Transactions Act No 25 of 2002, the Promotion of Access to Information Act 2 of 2000, the Constitution of South Africa 1996, and all applicable laws and regulations relating to the processing of personal data and privacy.
<i>Special Personal Information</i>	Means information concerning a Data Subject's religious, spiritual or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, physical or mental health, biometric information, sexual life, or criminal behaviour of a data subject to the extent that such information relates to alleged commission of any offence or any proceedings in respect of any offence allegedly committed by a data subject.

How we collect Information

We will ask you when we need information that personally identifies you (personal information) or allows us to contact you. This information is requested when you apply for any of our products or services, do an enquiry, enter a contest, order email newsletters or join a limited-access premium site.

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 apply for a product or service, electronically, telephonically or by visiting one of our brokers.
- Indirectly from you when you interact with us electronically by way of our website, app, or social media, which may include the collection of metadata (data about data).
- Where relevant, from third parties, i.e., public data bases, 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 for a product or service on our website and/or other online forms. Given that we already consider you a client at this stage, we may use this information to contact you to remind you to complete outstanding information.

Where we require personal information to provide you with our products and services, failure to provide us with the necessary information, will result in us being unable to provide you with our products and services. Where such services include financial advice, the appropriateness of the advice may be compromised if the information you provided is incomplete or inaccurate. You are responsible for informing us if your information changes.

Information collection

Your relationship with us determines the exact nature of the personal information we process, and the purpose for which such personal information is collected and used. We will only collect, collate, process and store (“use”) your personal information with your permission as set out in this privacy notice, unless legally required to do so, and will only use such information for the lawful purpose for which it is required as set out in this Privacy Notice.

In most instance we collect and process your personal information as part of providing you with products and services, the personal information we may process includes the following:

- Information about, i.e., your name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, employer.
- Contact Information, i.e., email, address, phone number and postal address.
- Online information, i.e., cookies, IP address (your computers internet address), if you use our website, app and/or social media channels.
- Financial Information i.e., we may process information related to payments you make or receive in the context of a insurance policy or claim. We may process information regarding your income, expenses, assets, liabilities, investment, retirement, and other financial provisions in the context of providing financial advice and intermediary services.
- Contractual information, i.e., details about the policies you hold, and with whom you hold them.

In certain instances, we may need consent to process your personal information. If you give us your consent for specific context, you are free to withdraw from 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.

Consent

If you choose not to register or provide personal information, you can still use most of the <http://www.Shieldlife.co.za> website, but you will not be able to access areas that require personal information.

Where you provide your personal information to us in the context of an application to our products or services, you agree that we may process your personal information in any way required for us to fulfil the product or service you require.

We 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 who are involved in the delivery and/or administration of our products and services,
- Other third parties in relation to the purposes set out under the section (What do we do with the information you share),
- Other insurers, public bodies, credit bureau, and law enforcement (either directly or through shared databases) for fraud detection and prevention.

We will not sell, rent, or trade your personal information to any third party.

We will not use your personal information for any purpose, other than that which we disclosed to you herein, unless you give us your express permission to do so, or unless we are permitted/required to do so by law. We 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 Sector Conduct Authority or the Prudential Authority).

On occasion, we may – for legitimate purposes – share aggregated information with our stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, we will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.

Access and Correction of Information

We will provide you with the means to ensure that your personal information is correct and current. You may review and update this information at any time by contacting us on 0861 777 353.

The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. This right can be exercised in accordance with the Shield Life PAIA manual.

In accordance with POPIA, you have a right to correct any of your personal information held by Shield Life. This right should be exercised in accordance with the procedure outlined in the Shield Life PAIA manual available on our website.

Security

Shield Life has taken strong and appropriate technical and organisational information security measures to protect the integrity, confidentiality, and security of your personal information and to ensure that your choices for its intended use are honoured. We take strong precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

Your transactions and information are secured and encrypted via a SSL certificate. When you supply us with your personal information, you're utilizing secure server software SSL, which encrypts your personal information before it's sent over the Internet. SSL is one of the safest encryption technologies available. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Your personal information is never shared outside Shield Life without your permission, except under conditions explained above. Inside Shield Life, data is stored in password-controlled servers with limited access. Your information may be stored and processed in South Africa or any other country where Shield Life, its affiliates or agents are located.

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.

You also have a significant role in protecting your information. No one can see or edit your personal information without knowing your username and password, so do not share these with others.

Age

To register with us you must be 18-years of age or older. Minors are strictly forbidden from using the service. However, where a policy is administered and we obtain personal information of children (i.e., dependants), we are committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

Enforcement

If for some reason you believe Shield Life has not adhered to these principles, please notify us by email at privacy@Shieldlife.co.za, and we will do our best to determine and correct the problem promptly. Be certain the words Privacy Notice are in the subject line.

PIN

When you use the <http://www.Shieldlife.co.za> website and the services provided by us, you may be given an access number, username, password and/or personal identification number (PIN). You are responsible for maintaining the secrecy and confidentiality of your username, , password and/or personal identification number ("PIN").

Collection of information by third parties

Owners or information system administrators of third-party websites that have links to the Shield Life website may collect personal information about you when you use these links. Shield Life does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties.

Clickstream data

Shield Life may collect anonymous information from visitors to its websites to help it provide better customer service. For example, Shield Life keeps track of the domains from which people visit its website and also measures visitor activity on its website. In doing so Shield Life ensures the information cannot be used to identify you. This information is sometimes known as "clickstream data". Shield Life 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, please notify us.

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.

What do we do with the information you share?

We have regulatory obligations to process your personal information, to maintain a record of our dealings with clients. For us to provide you with products and services, we need to collect, use, and disclose the personal information of our clients, prospective clients or any other personal information supplied.

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

- To make the site easier for you to use by not having to enter information more than once,
- To help us create content most relevant to you,
- To provide you with our products and services, and to maintain our business relationship with you,
- To alert you to product upgrades, special offers, updated information, and other new services from us,
- To send you updates about your product or service,
- To send you questionnaires to measure your satisfaction with our service,
- To send you announcements about new and exciting services that we offer,
- 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 policy applications,
- 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,
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the Financial Sector Conduct Authority and Prudential Authority),
- 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 our policies,

- For purposes of online login and authorisation,
- To 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 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 us and to help us improve our offerings to you,
- To conduct market research and provide you with information about our products and services from time to time via email, telephone, or other means
- To 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).

Shield Life will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- (a) conform to the edicts of the law or comply with legal process served on Shield Life or the site;
- (b) protect and defend the rights or property of Shield Life, and,
- (c) act in urgent circumstances to protect the personal safety of users of Shield Life, its Website, or the public.

Which laws apply?

This Privacy Notice will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Privacy Notice, we both submit to the jurisdiction of the South African courts.

The following acts apply, but are not limited to these acts:

- Electronic Communications and Transactions Act
- Consumer Protection Act
- Financial Intelligence Centre Act
- Protection Of Personal Information Act
- Promotion of Access to Information Act
- Proceeds Of Crime Act
- Protection Of Constitutional Democracy Against Terrorist and Related Activities Act
- Financial Advisory and Intermediary Services Act
- Insurance Act

Third party links

Our site may contain links to third party websites. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them. By registering at Shield Life you may receive follow-up contact and offers from third party companies as you have agreed to do by accepting this Privacy Policy and, while we only work with selected partners, we are not responsible for the services or representations of third parties.

Because we are not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to this website or websites facilitated by us), we do not exercise control over third parties' privacy policies, and you should refer to the privacy policy of any such third party to see how such party protects your privacy.

Objection to Processing of your Personal Information

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

You may object to receiving direct marketing from us at any time by contacting us on 0861 777 353 or privacy@shieldlife.co.za.

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

Cookies

A cookie is a small text file that is downloaded onto 'terminal equipment' (for example, 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 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 any of our websites. For example, you will not be able to benefit from automatic log-on and other personalisation features.

Complaints

Any complaints can be directed to complaints@shieldlife.co.za. 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 Information Regulator, whose contact details are:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: infoereg@justice.gov.za