

INTRODUCTION

We, Hybrid Risk Management (Pty) Ltd. (“Hybrid”, “The FSP”, “We”, “Us” and “Our”) value and respect the importance of protecting personal information.

This policy explains what information we collect and how we obtain, use, and disclose your (“You”, “Your”) personal information as is required in terms of the Protection of Personal Information Act (POPIA).

By using and/or accessing the Website available at www.hybridrisk.co.za (“The website”) and/or our mobile application (“App”) and/or products and services, you expressly consent to us collecting and processing your personal information on the basis as set out in this policy.

We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

PERSONAL INFORMATION

We collect and process your personal information primarily to provide you with access to our services and products as well as to assist us improve our services to you.

Personal information is any information specific to you, which you provide, or which is received by us through our website, mobile application, intermediaries (brokers), helpdesk, or any other channel with your consent.

This information may relate to you as a natural or a juristic person. For example:

- Name & surname
- Identity number
- Contact information
- Address
- Vehicle information
- Property information
- Insurance history, claims or credit information
- Company information
- Etc.

We may also collect and process data relating to your visits to our website and / or app including, but not limited to traffic data, location data, weblogs and other communication data.

The Website and App make use of Cookies in order to provide You with relevant content and the best experience possible whilst using the Website and/or App. At any stage during Your use of the Website and/or App You may choose to block the Cookies used by us, however this may impact your use or experience of the Website and/or App.

The collection, storing and processing of personal Information may be required to assess your risk profile, process claims, provide quotations, services or to answer any requests or enquiries, relating to a service and will only be used where it is relevant.

It is the FSP's intention that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

USE OF INFORMATION

The FSP needs to collect, store, verify or share personal or other information for the following purposes:

- For underwriting purposes
- Assessing, validating, and processing claims
- Conducting credit reference searches or verification
- Confirming and verifying an individual's identity
- For credit assessment and credit management
- For purposes of claims or insurance history
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- Conducting market or customer satisfaction research
- For audit and record keeping purposes
- In connection with legal proceedings
- Follow an individual's instructions
- Inform an individual of services
- Make sure the FSP's business suits the individual's needs

Personal information collected, is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only.

We will not reveal any personal information to anyone unless:

- it is necessary to conduct our business or deliver our service (for e.g., process your claim)
- we are compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law
- it is in the public interest
- it is necessary to protect or defend our rights or that of our partners, clients, agents, employees or third-party service providers
- the FSP undergoes a change in ownership, for the sole purpose of the new owner being able to continue operating the business
- otherwise agreed with you.

REVOKING CONSENT AND/OR REQUEST DELETION OF PERSONAL INFORMATION

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If you have an active insurance contract, we have to maintain your details in order to administer said policy;
- If there is an unresolved issue relating to your account, such as an outstanding or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;

- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

SECURITY

The FSP strives to ensure the security, integrity and privacy of personal information submitted. The FSP will review and update its security measures in accordance with future legislation and technological advances.

Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, the FSP will endeavour to take all reasonable steps to protect the personal information, which an individual submits to the FSP or to the FSP's online products and services.

The FSP will at all times set the highest standards to ensure the integrity of their systems.

The FSP may engage with other organisations to provide support services to the FSP. Third Parties are obliged to respect the confidentiality of any personal information held by the FSP.

The FSP's employees are obliged to respect the confidentiality of any personal information held by the FSP. All employees are required to sign an employment contract which includes a confidentiality clause.

The FSP endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact the FSP to have the information corrected.

The FSP recognises the importance of protecting the privacy of information collected about individuals, in particular information that is capable of identifying an individual ("personal information").

CONDITIONS FOR THE LAWFUL PROCESSING OF PERSONAL INFORMATION

According to the POPI Act there are eight conditions that must be complied with to ensure that the processing of personal information is lawful. These conditions include:

1. Accountability

The responsible party must ensure that the conditions set out in Chapter 3 of the POPIA and all the measures that give effect to such conditions, are complied with at the time of determining the purpose and the means of the processing.

2. Processing Limitation

Personal information may only be processed in a lawful and reasonable manner that does not infringe on the privacy of the data subject.

Personal information may only be processed if:

- the data subject or a competent person, where the data subject is a child, consents to the processing;
- processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- processing complies with an obligation imposed by law on the responsible party;
- processing protects a legitimate interest of the data subject;
- processing is necessary for the proper performance of a public law duty by a public body;
- processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.
- The FSP will also ensure that any personal information that is processed by it was obtained directly from the data subject.

3. Purpose Specific

The FSP will process personal information only for specific, explicitly defined, and legitimate reasons. The FSP will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.

4. Further Processing Limitation

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Therefore, if the FSP wishes to process existing personal information for a purpose other than the purpose for which it was originally collected, the FSP will first obtain additional consent from the data subject.

5. Information Quality

The FSP will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.

Where personal information is collected or received from third parties, the FSP will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or by way of independent sources.

6. Openness

The FSP will take reasonable steps to inform all data subjects whose information is being collected of:

- The information being collected and where the information is not collected from the data subject, the source from which it is collected;
- The name and address of the responsible party;
- The purpose for which the information is being collected;
- Whether or not the supply of the information by that data subject is voluntary or mandatory;

- The consequences of failure to provide the information;
- Any particular law authorising or requiring the collection of the information;
- The fact that, where applicable, the responsible party intends to transfer the information to a third country or international organisation and the level of protection afforded to the information by that third country or international organisation.

7. Security Safeguards

The responsible party must secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information.

To achieve the abovementioned results, the responsible party must take reasonable measures to:

- identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- establish and maintain appropriate safeguards against the risks identified;
- regularly verify that the safeguards are effectively implemented; and
- ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

8. Data Subject Participation

A data subject may request whether their personal information is held, as well as the correction or deletion of his or her personal information held by the FSP. The FSP will take all reasonable steps to confirm your identity before providing details of your personal information.

CONTACT INFORMATION

Any questions relating to the FSP's POPI policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer:	Hendrik Smit
Telephone number:	087 80 80 807
Postal address:	Postnet suite 99 Private bag x5 Strubensvalley 1735
Physical address:	Clearwater office Park building 2 Millennium boulevard Strubensvalley Roodepoort 1735
Email address:	hendre@hybridrisk.co.za
Website:	www.hybridrisk.za

POPI COMPLAINTS

Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon.

All complaints must be submitted to the FSP in writing and will be considered by the Information Officer.

Where the data subject is not satisfied with the Information Officer's determination, the data subject has the right to complain to the Information Regulator.

Information Regulator

Tel: 010 023 5200

Email: enquiries@info regulator.org.za
POPIAComplaints@info regulator.org.za