

PRIVACY NOTICE

PRIVACY NOTICE

At Old Mutual, we are committed to protecting your privacy. We ensure that your personal information is collected and used responsibly, lawfully, and transparently, in compliance with the Protection of Personal Information Act (POPIA) and other applicable privacy requirements.

This Notice is here to help you understand how we handle your personal information — from collecting and using it to sharing it when needed. It also explains the rights you have and how you can make use of them.

THIS NOTICE SETS OUT:

-  **Who we are**
-  **What information we collect and from where we collect it**
-  **The purpose for which we use your information**
-  **Our aim to provide ongoing financial services**
-  **To whom we disclose your information**
-  **How we safeguard your information**
-  **Managing Your Information: Access, Correction, and Deletion Rights**
-  **Changes to this Notice**
-  **How to contact us**
-  **The Information Regulator's contact details**



WHO WE ARE

In this Notice, “Old Mutual”, “Old Mutual Group” or “we” means one or more of the companies / entities in the Old Mutual Group that operate in South Africa.

THE INFORMATION WE COLLECT

We collect and process your personal information mainly to give you access to our services and products, to make them better, and for the other reasons explained in this Notice. To do this, we need certain details from you. Without them, we may not be able to start or maintain our relationship with you or provide the help you need.

If you share **personal information about others** (such as your spouse, beneficiaries, or dependents), we'll use it to issue a policy or benefit and to support their legitimate interests. We'll also handle their information in line with the purposes explained in this Notice.

The information we collect depends on why it's needed, and we only ask for what's necessary.

Most of the time, we get this information directly from you — for example, when you apply for a product or service, send us an enquiry, or get in touch with us.

We may also collect certain information — including criminal and medical data — from trusted sources such as:

- Credit reference agencies, fraud prevention bodies, and law enforcement authorities, to meet legal and security requirements.
- Other insurers, to help prevent fraudulent claims.
- Other companies within the Old Mutual Group, where this supports the purposes explained in this Notice or helps us improve the products and services we offer you. This may include combining your details with information from other Old Mutual entities to give you a more consistent, personalised experience and to keep your records accurate.

We don't knowingly collect personal information from **anyone under 18** unless a parent or legal guardian has given consent. If we find that such information was provided to us without the required consent of a parent or legal guardian, we'll take steps to delete it promptly.

We take steps to make sure your personal information is complete, accurate, up to date, and not misleading. To help us do this, we prefer to get information directly from you — and we appreciate your efforts to keep your details current.

You can update your information by:

- Logging into our secure website: **Login | Register**
- Using the **Old Mutual App**
- Sending an email to: **PImanagement@oldmutual.com**

THE INFORMATION WE COLLECT

If we can't collect information directly from you, we may rely on trusted, independent third-party sources.

When you use our website, we also collect usage information through “cookies.” These help us understand things like how you accessed the site, your visit history, the type of device you're using, and your approximate location. For more details, please see our **Cookie Policy** on our website.

PURPOSE FOR WHICH WE USE YOUR INFORMATION

We handle your personal information according to recognised **legal grounds**. This may be based on your consent, fulfilling a contract with you, meeting legal requirements, or supporting our legitimate business interests.

You agree that we may obtain and **share information about your creditworthiness** — or that of anyone responsible for payments on your policy — with credit bureaus, industry associations, and other relevant bodies. This may include details such as your credit and financial history, judgments, or default records. We share this information only for purposes such as risk analysis, tracing, and other related activities.

We use your personal information only for specific purposes, including:

- Providing our products and services, completing your transactions, and maintaining our relationship with you
- Underwriting policies
- Assessing and processing claims
- Conducting credit reference checks or verification
- Confirming and verifying your identity, address, and banking details
- Ensuring you are an authorised user for security purposes
- Keeping your personal information accurate and up to date
- Operational needs such as credit scoring, assessment, and credit management
- Claim checks (for example, through industry Life and Claims Registers)
- Detecting and preventing fraud, crime, money laundering, or other malpractice
- Responding to your enquiries, complaints, or requests, and keeping you informed about your policies or services
- Monitoring systems and transactions to protect against cyber threats or unauthorised access

PURPOSE FOR WHICH WE USE YOUR INFORMATION

- Sharing updates, offers, or information about products and services you may find useful — with your consent if you are not yet a customer, and with the option to opt out if you are
- Analysing trends and feedback to improve our products, services, and customer experience
- Meeting tax, audit, reporting, and other legal or regulatory obligations
- Supporting business continuity, restructuring, mergers, or acquisitions, where personal information may be part of the transferred assets
- Using personal information (with appropriate safeguards) to develop and test proof of concepts, pilots, or new initiatives aimed at improving our products, services, and customer experience.

We will also process your personal information to **comply with legal and regulatory requirements or industry codes** that apply to us, or where otherwise permitted by law, for example, to protect Old Mutual's legitimate interests.

Additionally, we may process your personal and special personal information to **conduct sanction screening against both mandatory and non-mandatory sanctions lists**. If you are matched to any such list, we may share your information with local and international regulatory bodies, as well as other entities within the Old Mutual Group.

ONGOING FINANCIAL SERVICES

As part of our commitment to supporting you with ongoing financial services, we may use your personal information to share updates about financial products and services that could benefit you. We will only contact you **in line with your consent and preferences**.

If you would prefer not to receive these communications, you can opt out at any time by:

- Sending your ID number via **SMS to 30994**
- Customer **Call Centre: 0860 50 60 70**

You are free to give or **withdraw your consent** whenever you choose, and you can also let us know how you would like us to contact you.

DISCLOSURE OF INFORMATION

We may share your personal information with **trusted service providers** who help us deliver products and services to you. These providers are required, under strict agreements, to follow our privacy standards and protect your information.

Your personal information may be shared with:

- Trusted third parties for the purposes explained in this Notice, such as credit reference agencies, fraud prevention bodies, and law enforcement authorities.

DISCLOSURE OF INFORMATION

- Other insurers, to help prevent and detect fraudulent claims.
- Other entities within the Old Mutual Group, and, where appropriate, Old Mutual-sponsored retirement funds. This sharing is only for the purposes listed above or where we believe it will improve the services and products we provide to you—unless you have objected to such sharing.
- Third parties you have chosen to receive marketing communications from.

We may also disclose your personal information:

- When required by law or under industry codes.
- When necessary to protect our rights or interests.

If our business goes through a **merger, acquisition, or divestiture**, we may need to share your personal information with the third parties involved in the transaction. Any new entity that takes over will have access to this information and must handle it in line with this Privacy Notice.

INFORMATION SECURITY

We are legally required to **protect the personal information** we hold and to prevent any unauthorised access, use, or disclosure. To keep your information safe, we regularly review and strengthen our security measures and processes.

Our security policies and procedures are designed to keep your personal information safe. They include:

- Physical security to protect our offices and systems.
- Computer and network security to safeguard against cyber threats.
- Controlled access so only authorised people can view your information.
- Secure communications to ensure your data is protected when shared.
- Strict measures when outsourcing to make sure partners follow the same standards.
- Retention and secure disposal of information when it's no longer needed.
- Clear rules for acceptable use of personal information.
- Strong governance and regulatory compliance to meet legal requirements.
- Monitoring of access and usage to detect and prevent misuse.
- Investigation and response to any security incidents.



INFORMATION SECURITY

When we engage third party service providers, we **impose appropriate security, privacy, and confidentiality obligations** to ensure that any personal information they handle on our behalf is protected to the same standard we are required to uphold.

If we **transfer your personal information to another country** for processing or storage, we will ensure that the recipient agrees to treat your information with the same level of protection required under applicable privacy laws.

Where personal information **is transferred outside South Africa**, we ensure that appropriate safeguards are in place, such as contractual clauses or data protection certifications, to maintain the same level of protection.

We apply the **principles of privacy by design** and by default in our systems and processes. This means we integrate data protection into the development of our products, services, and operations from the outset.

In the event of a **data breach** that may compromise your personal information, we will notify you and the Information Regulator as required by law.



YOUR RIGHTS

When you exercise your rights, we will take reasonable steps to confirm your identity to keep your personal information safe.

ACCESS TO INFORMATION

You have the right to request a copy of the personal information we hold about you.

To do so, you may:

- Log in to our **Secure Portal** or use the **Old Mutual App** to review your personal information.
- Contact us at **PAIA@oldmutual.com** and specify the information you would like to access.

Please note that access requests may be subject to a legally allowable fee. View our **PAIA (Promotion of Access to Information Act, 2 of 2000) manual**.

OBJECTION TO PROCESSING

In certain cases, you have the right to object to the processing of your personal information. To exercise this right, please contact us at **PIManagement@oldmutual.com**.

CORRECTION OF YOUR INFORMATION

You have the right to request that we update or correct your personal information.

You may do this by:

- Logging into our **Secure Portal** or using the **Old Mutual App**.
- Contacting us at **PIManagement@oldmutual.com**.



YOUR RIGHTS

DELETION OF YOUR INFORMATION

We keep your personal information only for as long as it is needed to meet the purposes set out in this Notice, unless the law or legitimate business reasons require us to keep it for longer. When it is no longer needed, we will securely destroy it in line with Old Mutual's data destruction standards.

You also have the **right to ask us to delete or destroy** your personal information. We will do so unless the law or legitimate business reasons require us to keep it.

To make this request, contact us at **PImanagement@oldmutual.com**.

AUTOMATED DECISION MAKING

Sometimes we use **automated systems (without human involvement)** to process your personal information and make decisions about you or your application for products or services. These decisions may include checking eligibility, assessing risk, or suggesting products that may suit your needs.

You have important rights when this happens. You can:

- Ask for human review of any decision made solely by automated processing.
- Share your views about the decision.
- Challenge the outcome if you disagree with it.

We make sure all automated decision-making is fair, transparent, and regularly reviewed to protect your interests.



CHANGES TO THIS NOTICE

Please note: We may unilaterally update this Notice from time to time. We encourage you to visit this website regularly to stay informed about any changes.



HOW TO CONTACT US

Old Mutual has appointed a **Privacy and Information Officer** to oversee our data protection strategy and ensure we comply with all applicable privacy laws.

If you have any questions, concerns, or complaints about how your personal information is handled, you can contact our Privacy and Information Officer at **Privacy@oldmutual.com**.



INFORMATION REGULATOR

You have the **right to lodge a complaint** with the Information Regulator if you believe your personal information has been handled in a way that does not comply with privacy laws.

CONTACT DETAILS:

Website: **<https://inforegulator.org.za>**

General enquiries: **enquiries@inforegulator.org.za**

Complaints: **popiacomplaints@inforegulator.org.za**