

PROTECTION

OF

PERSONAL

INFORMATION

POLICY

Dialog
Maintenance

A: PROTECTION OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

1 PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013

POPI requires the company to inform their clients as to the manner in which their personal information is used, disclosed and destroyed.

The company guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

The Policy sets out the manner in which the company deals with their client's personal information as well as and stipulates the purpose for which said information is used.

1.1 PERSONAL INFORMATION COLLECTED

Section 9 of POPI states that "*Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.*"

The company also collects and processes the client's personal information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients.

Dialog Maintenance aims to have agreements in place with all product suppliers, insurers and third party service providers to ensure a mutual understanding with regard to the protection of the client's personal information. **Dialog Maintenance** suppliers will be subject to the same regulations.

With the client's consent, **Dialog Maintenance** may also supplement the information provided with information the company receives from other providers in order to offer a more consistent and personalized experience in the client's interaction with **Dialog Maintenance**.

For purposes of this Policy, clients include potential and existing clients.

1.2 THE USAGE OF PERSONAL INFORMATION

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed.

This may include:

- Providing products or services to clients and to carry out the transactions requested;
- For underwriting purposes;
- Assessing and processing claims;
- Conducting credit reference searches or- verification
- Confirming, verifying and updating client details;
- For purposes of claims history;
- For the detection and prevention of fraud, crime, money laundering or other malpractices;
- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Providing services to clients, to render the services requested and to maintain and constantly improve the relationship;
- Providing communication in respect of the company and regulatory matters that may affect clients; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for processing of Personal Information:

- a) The client's consents to the processing: - consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship;
- b) The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of amongst other credit limits, insurance requirements, etcetera.

1.3 DISCLOSURE OF PERSONAL INFORMATION

Dialog Maintenance may disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect **Dialog Maintenance's** rights.

1.4 SAFEGUARDING CLIENT INFORMATION

It is a requirement of POPI to adequately protect personal information. **Dialog Maintenance** will continuously review its security controls and processes to ensure that personal information is secure.

1.4.1 Each new employee will be required to sign an **EMPLOYMENT CONTRACT** containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;

1.4.2 Every employee currently employed within **Dialog Maintenance** will be required to sign an addendum to their **EMPLOYMENT CONTRACTS** containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;

1.4.3 **Dialog Maintenance** archived client information is stored on site which is also governed by POPI, access is limited to these areas to authorized personal.

1.4.4 All electronic files or data are **BACKED UP** by the company IT Division which is also responsible for system security that protects third party access and physical threats. The Company IT Division is responsible for Electronic Information Security;

CONSENT to process client information is obtained from clients (or a person who has been given authorization from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Clients have the right to access the personal information **Dialog Maintenance** holds about them. Clients also have the right to ask the company to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, the company may no longer process said personal information. **Dialog Maintenance** will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.

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