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Leppard and Associates (Pty) Ltd – Protection of Personal Information Manual

We respect your right to the protection of your personal information. This document will help you exercise those rights as required by the various sections of the Protection of Personal Information Act 4 of 2013 (POPI).

PROTECTION OF PERSONAL INFORMATION

Introduction

Leppard Underwriting conducts business as a specialist underwriting business and we are obliged to comply with The Protection of Personal Information Act ('POPI'). POPI requires Leppard Underwriting to inform you as to how your Personal Information is used, disclosed and destroyed. Leppard Underwriting guarantees its commitment to protecting your privacy and ensuring your Personal Information is used appropriately, transparently, securely and in accordance with applicable laws. 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."

This Policy sets out how Leppard Underwriting deals with your Personal Information and in addition for what purpose said information is used. This Policy is made available on our company website www.leppard.co.za.

In the general conduct of our business, Leppard Underwriting collects and processes your Personal Information pertaining to you and your clients underwriting requirements. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform you what information you are required to provide us with and what information is optional.

How we process and protect personal information

We process the personal information of various categories of people for various purposes as set out in this clause.

Categories of people

We process the personal information of the following categories of people:

- brokers and their clients;
- employees;
- contractors, vendors, or suppliers;
- debtors and creditors; and
- directors and shareholders.



This list is not exhaustive.

Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and ages, identity numbers;
- demographic details, such as races and age groups;
- account numbers, and other financial information;
- contract information; and
- market intelligence information;

This list is not exhaustive.

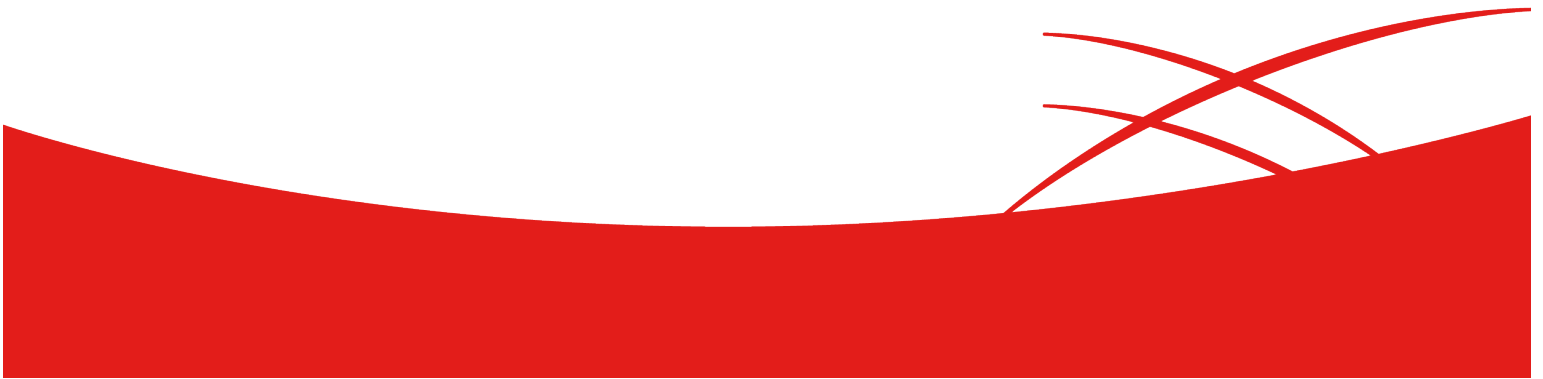
Purposes

We process the personal information:

- to supply our services;
- for assessing and processing claims;
- for purposes of claims history;
- for the detection and prevention of fraud, crime, money laundering and other malpractices;
- to conduct market or client satisfaction research;
- for audit and record-keeping purposes;
- to keep our client's records up-to-date;
- to provide the services requested and to maintain and constantly improve the client relationship;
- to provide communications in respect of Leppard Underwriting and regulatory matters that may affect clients;
- to comply with legal and regulatory requirements or when it is otherwise allowed by law;
- to manage employees in general;
- to manage supplier contracts in general;
- to manage broker relationships in general;
- to process client requests or complaints; and
- process personal information of employees for forensic purposes.

According to section 10 of POPI, Personal Information may only be processed if certain conditions are met, some of which are listed below:

- Client consents to the processing;
- The processing is necessary;



- Processing complies with an obligation imposed by law on Leppard Underwriting;
- Processing protects a legitimate interest of the client;
- Processing is necessary for pursuing the legitimate interests of Leppard Underwriting or of a third party to whom information is supplied – in order to provide you with the appropriate products both ourselves and our Product suppliers and insurers need certain Personal Information from you and your clients to make an expert decision on the unique and specific product they require.

Disclosure of personal information

We may disclose your and/or your clients' Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

We may also share client Personal Information with, and obtain information about clients from third parties for the reasons already discussed above.

We may also disclose clients' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

Access and correction of personal information

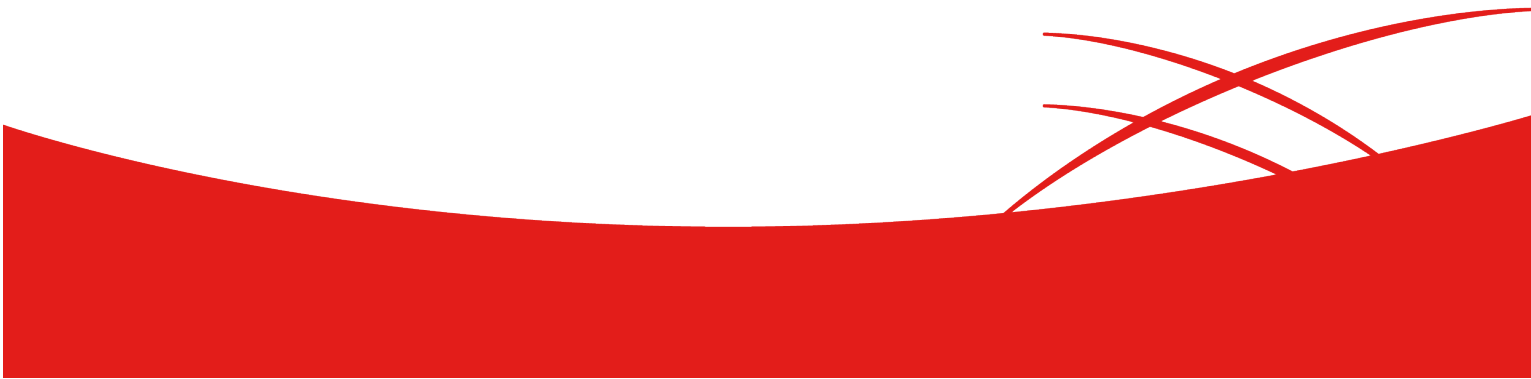
You have the right to access the Personal Information we hold about you. You also have the right to ask us to update, correct or delete your Personal Information on reasonable grounds. Once an objection to the processing of your Personal Information has been received, Leppard Underwriting may no longer process said Personal Information. We will take all reasonable steps to confirm your identity before providing details of your Personal Information or making changes to your Personal Information.

The details of our Information Officer are as follows:

- Contact email: fatima@leppard.co.za
- Information officer: Fatima Ebrahim
- Information officer email: fatima@leppard.co.za

Cross-border transfers

We send personal information outside of South Africa to various countries. We will only transfer data to other countries that have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same



standard we must protect it.

Security

We secure our data by maintaining reasonable measures to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

Staff training and acceptance of responsibilities

Information for Leppard Underwriting staff is contained in this Manual and other materials made available by the Information Officer. The Information Officer will ensure that all staff that has access to any kind of personal information will have their responsibilities outlined during their induction procedures. We will provide opportunities for staff to explore any POPI issues through training, team meetings and other staff interactions. Staff rights and responsibilities in terms of POPI are set out in this Manual and our Human Resources Policies and Practices document, which all staff accepts on commencement of employment.

Availability of this Manual

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website at: <http://www.leppard.co.za> .

Updates to this Manual

This manual will be updated whenever we make material changes to the current information.

Last updated 8 October 2019

