

# What is personal information?

Personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

# What personal information is collected?

When you visit, browse, register, or interact through Genoa's website, the following personal information about you may be collected:

- Name and Surname
- ID/Passport Number
- Physical address
- Contact details
- Language
- Information relating to education, employment and financial history
- Email address
- Location
- Information relating to your computer's Internet Protocol (IP) address, browser type, browser version, the pages of our website that you visit, the date and time of your visit, the duration of time spent on the website pages, and other applicable statistics.

Personal information may also be collected from you directly in the event that you make a claim. Genoa will collect personal information from you about the claim and any relevant third parties.

Genoa may also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal information, but is not considered personal information in law as this information does not, directly or indirectly, reveal your identity.

# Purposes for which Genoa uses your personal information

Any information collected from you may be processed for, amongst others, the following purposes:





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- a) To assess your profession, age, business activities, current risks insured, past and current insurance history;
- b) To assess previous claims history;
- c) To assess certain criteria and eligibility for quotation;
- d) To determine acceptable level of risk for Insurer;
- e) To provide quotation;
- f) To assess, check, and process claims;
- g) For statistical and research purposes;
- h) 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);
- i) To undertake credit reference searches and/or verification;
- j) For audit and record-keeping purposes
- k) For policy disputes or legal proceedings
- 1) To process your application for a vacancy; or
- m) To detect, prevent or deal with actual or alleged fraud, security breach, or the abuse, misuse or unauthorised use of the website and/or contravention of this Privacy Policy.

### **Protection of your personal information**

Genoa takes the security of your personal information very seriously.

Genoa recognises the vital role that information technology plays in its daily operations, and the reliance placed on IT systems in processing personal information.

Although absolute security cannot be guaranteed, Genoa will take reasonable technical and organisational measures to protect your personal information against accidental, unauthorised or intentional manipulation, loss, misuse, destruction, disclosure or access.

Genoa's security measures are regularly verified for its operating effectiveness.

Reasonable mechanisms, tools and technologies have been implemented to detect, prevent and respond to security violations. Information security policies and procedures that govern security safeguards are in place, including dedicated teams and business processes to govern instances of noncompliance with privacy policies, procedures or applicable law.

# Disclosure of your personal information

Genoa may disclose your personal information if authorised to do so by law.

Genoa also engages with various third parties, to improve its service and create efficiency in its operations.

When Genoa shares your information with any third party, they will be required to respect your right to privacy and Genoa will ensure that they have the necessary safeguards in place to secure your personal information.

Genoa will only allow third parties to process your personal information for a specific purpose, in accordance Genoa's instructions and applicable law.

### **Retention of your personal information**

Genoa may retain all personal information that is collected from brokers which is collected directly from you, for as long as it remains necessary for the purposes for which it was collected unless there is a valid technical, legal or business reason for it to be deleted, destroyed or to de-identify it.

Records shall only be made available in accordance with the Promotion to Access of Information Act 2 of 2000.

#### **Direct marketing**

Genoa does not use data for marketing purposes, however to ensure continuous improving of the care and service offering, users may be asked to complete service experience questionnaires.

# Storage and transfer of your personal information

Genoa stores your personal information on its servers and/or on third party servers.

Genoa reserves the right to transfer to and/or store your personal information on servers in a jurisdiction other than where it was collected. If the location where personal information is transferred to does not have substantially similar laws which provide for the protection of personal information, Genoa will take reasonably practicable steps to ensure that your personal information is adequately protected in that jurisdiction.

#### **Cookies**

When using Genoa's website, Genoa uses Cookies to understand your online activity, and save your preference for future visits.

A cookie is a small piece of data sent from our website to your computer or device or internet browser where it is saved.







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The cookie contains information to personalize your experience on Genoa's website.

The cookie has the ability to identify your device, computer or smart phone.

By using Genoa's website and applications you agree that cookies may be forwarded from the relevant website or application to your computer or device.

Genoa may use the cookie to confirm that you visited the website.

You have the right to choose whether or not to accept cookies. However, please note that if you do not accept the cookies, you may not be able to use the full functionality of the website or mobile applications.

When you interact with any Genoa's website, you may come across links to other websites and applications.

Genoa is not responsible for the security of those websites, or the information that it contains. In some cases, links are provided as a value added service for information purposes only. Please remember that when you click on a link on Genoa's website and you are taken to another web page or website or application, that this Privacy Policy will no longer apply.

You also acknowledge that by clicking on a link, that you do so at your own risk and hold Genoa harmless against any loss or damage that may occur.

#### **Purpose statement**

Your personal information is stored with to improve efficiency in policyholder policy, contract and claims administration.

#### **Changes to this Privacy Policy**

From time to time, changes will be required to this Privacy Policy. Please check this website to inform yourself of any changes made to this Privacy Policy.

#### **Your rights**

Genoa will, at all times, process your personal information in accordance with applicable laws and your rights are set out below:

- You have the right to correct your personal information if it is incorrect;
- You have the right to update your personal information if your details have changed;
- You have the right to object to the processing of your

personal information;

- You have the right to your personal information being deleted; and
- You have the right to be informed if your information has been deleted. If you would like to exercise any of your rights:
- · Submit any objection that you may have; or
- Request destruction of your personal information it is being retained for longer than required by law;

You acknowledge that, in some cases, Genoa may not be able to comply with your request to delete or destroy your personal information if this request conflicts with applicable law.

## **Information regulator**

You have the right to complain to the Information Regulator, whose contact details are:

### **Information Regulator**

Tel: 012 406 4848 Fax: 086 500 3351

Email: Inforeg@justice.gov.za

#### **Important information**

If you have any questions regarding the contents of this policy you may address those concerns in writing to:

#### **Information Officer:** Adrian Smit

The Firestation,

Suite 806,

16 Baker Street,

Rosebank,

Johannesburg, 2196

Tel: 010 286 1915

Email: adrian@genoa.co.za

## **Declaration**

By clicking on this page or link:

- You have read the contents of this policy;
- You understood the contents of this policy;
- You are in agreement with the contents of this policy;
- You have no objections to your personal information being managed in this way by The practice and
- That you have no questions regarding the contents of this policy.







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