

## Privacy Notice

CLC's Privacy Policy describes how we collect, use, disclose, retain, and protect your personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws.

The Protection of Personal Information Act 9 (POPIA) describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

The person to whom personal information relates is referred to as the "data subject".

### What Information do we Collect?

The exact nature of the personal information CLC processes, and the purpose for which such personal information is collected and used will be determined by your relationship with CLC.

CLC in most cases acts as an Operator, as we use the Personal Information collected and provided by the Responsible Party to provide our services. In some cases, CLC does collect Personal Information directly.

CLC will only collect information that we need for the identified purpose.

Examples of personal information include, but are not limited to, contact details, identity number, name, language, short-term insurance policy details.

### How do we Collect Personal Information?

CLC collects information either directly from our data subjects or through intermediaries. The source from which personal information was obtained, if not directly from the data subject, will be disclosed.

CLC receives personal information through various channels. These channels are:

- Bordereaux's
- Data Dumps
- Electronically (E-Mail, Fax)
- Telephonically
- Written

### How do we use Personal Information?

CLC have regulatory obligations, including compliance with anti-money laundering legislation, to process personal information. This includes verifying the identity or the identity of beneficial owners and/or controlling persons of data subjects. We are also required by various laws to maintain a record of our dealings with clients.



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In order for us to provide clients with the financial products and services requested and to notify clients of important changes to such products and services, we need to collect, use, and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients, service providers and policy holders.

To the extent permissible under applicable laws, CLC may use personal information to:

- Identify data subjects and conduct appropriate checks;
- Administer and manage our products and services and systems, including the management and administration of claims, recoveries and settlements, emergency assistance services and value-added product services;
- Assess and investigate any claims made by data subjects under their policies;
- Assess and investigate any claims made by a third party against one of our data subjects;
- Seek recovery from a third party due to any claim we or our data subjects may have against the third party;
- Assist data subject in the event of an emergency according to our products and services;
- Manage, train, and develop our employees and representatives;
- Manage complaints and disputes, and report to dispute resolution bodies;
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators;
- To undertake credit reference searches and/or verification;
- For the detection and prevention of unlawful activity, fraud, money-laundering, and loss, including as part of party due diligence required under applicable laws and in terms;
- To record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents, or contractors) in order to accurately carry out instructions and requests, to use as evidence and in the interests of crime prevention;
- For statistical analysis and research purposes;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;

### Who do we share Personal Information with?

CLC will only share personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information provided to us to the following entities:

- Our third-party service providers who are involved in the delivery of our products and services
- Insurers and Underwriting Managers
- Regulatory Authorities

CLC will not sell, rent, or trade your personal information to any third party. CLC will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Financial Sector Conduct Authority).

On occasion, CLC may – for legitimate purposes – share combined information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, CLC will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.



**Directors: K. Hunt (CEO), D. Castle (COO)**

Tel: 0861-22-22-52 | Address: Building 23, Cambridge Office Park, 5 Bauhinia Street, Highveld Techno Park, Centurion, 0157

Email: [info@clc.co.za](mailto:info@clc.co.za) | Web: [www.clc.co.za](http://www.clc.co.za) | Authorised Financial Services Provider FSP No.: 26908 | Registration No.: 2015/055927/07

## How do we Secure Personal Information?

CLC processes the data of data subjects in a proper manner and shall take appropriate security measures to prevent loss of personal information, damage of personal information, unauthorised access, disclosure, modification, or unauthorised destruction of the data. The company will store all the personal information in secured environments, for example on secured servers in a protected data centre.

## Right to access Personal Information

The Promotion of Access to Information Act (PAIA) coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. Any right to information to be obtained under the PAIA Act, can be exercised in accordance with the CLC PAIA Manual which can be found on our website.

## Right to correct Personal Information

In accordance with POPIA, you have a right to correct any of your personal information held by CLC. [Should you wish CLC to correct your personal information, you are referred to our POPI Procedure Manual]

## Objection to processing Personal Information

In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

## Updating this Notice

Please note that we may amend this Notice from time to time. Please check this website periodically to inform yourself of any changes.

## How to Contact Us

This Privacy Notice applies to Customer Loyalty Consultants (Pty) Ltd.

Please direct any questions, complaints or concerns regarding this privacy notice, data privacy and our treatment of your Personal Information to the following:

[info@clc.co.za](mailto:info@clc.co.za)

Upon receiving your request, we will contact you directly, investigate your request, and work to address your concerns. We will respond to your request without undue delay. We reserve the right to take reasonable steps to verify your identity prior to granting access or processing changes or corrections.

## Information Regulator

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa)  
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
P.O. Box 31533, Braamfontein, Johannesburg, 2017  
Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
General enquiries email: [info@justice.gov.za](mailto:info@justice.gov.za)



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