THIS **UBUNTU-BATHO**'s Protection of personal information statement communicates how we collect, use, process and discard your personal information.

1. **SCOPE OF THIS PRIVACY STATEMENT**
    1. Introduction and scope
        1. **UBUNTU-BATHO** ("**UBUNTU-BATHO**" or "**we**" or "**us**" or "**our**") conducts its business as a by providing a wide range of funeral insurance and burial service solutions in the Republic of South Africa, with our head offices located at 368 Madiba Street, Pretoria. **UBUNTU-BATHO** is the responsible party (or controller, in some jurisdictions) of your Personal Information (as defined below).
        2. We strive to ensure that our use of the Personal Information of a data subjects (a person to whom Personal Information relates) is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our offerings and your experience
        3. We have appointed an Information Officer who is responsible for overseeing questions in relation to the Privacy Statement. You may contact our Information Officer at informationoffice@Ubuntu-Batho.co.za to discuss this Privacy Statement or your rights under data protection laws that are applicable to you.
        4. This Privacy Statement describes how we will treat your Personal Information whether provided by you to us, or collected by us through other means in your ordinary use of our products and/or services, which includes access to our website ("the Website") and online platforms.
        5. This Privacy Statement must be read together with any Website terms and conditions and any other documents or agreements that describe the manner in which we, in specific circumstances, collect or process Personal information about you. This will enable you to understand the manner in which **UBUNTU-BATHO** will process your Personal Information. This Privacy Statement supplements such other documents and agreements but does not supersede them and in the event of any conflict, ambiguity or inconsistency between this Privacy Statement and such other documents and agreements, the terms of the particular document or agreement will prevail.
2. **THE PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU**

1. **UBUNTU-BATHO** may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Statement. When we perform one or more of these actions, we are "**Processing**" your Personal Information.
2. "**Personal Information**" refers to private information about an identifiable natural or juristic person. Personal Information does not include information that does not identify a person (including in instances where that information has been anonymised). The Personal Information that we collect about you may differ on the basis of the products and services that you receive from **UBUNTU-BATHO**.
3. We may process various types of Personal Information as follows:
    1. **Identity Information**, which includes information concerning your name, username or similar identifier, marital status, title, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number, registration number and your qualifications;
    2. **Contact Information**, which includes your billing addresses, delivery addresses, e-mail addresses and telephone numbers, as well as company secretarial information that has been disclosed in relation to you;
    3. **Financial Information**, which includes bank account and payment card details, insurance information, financial statements and VAT registration numbers and credit ratings;
    4. **Transaction Information**, which includes details about payments made to or received from you and company information, which may consist of financial activity and regulatory disclosures;
    5. **Technical Information**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website;
    6. **Profile Information**, which includes your username and password, purchases or orders made by you, your interests, preference and feedback;
    7. **Usage Information**, which includes information as to your access to and use of the Website, products and services; and

8. **Marketing and Communications Information**, which includes your preferences in respect of receiving marketing information from us and our third parties, and your communication preferences.

4. **UBUNTU-BATHO** may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information, as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that has the result that it can directly or indirectly identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Statement.
5. **UBUNTU-BATHO** does not process special personal information in the ordinary course of business although criminal record screening might be done during recruitment screening or for anti-money laundering purposes. We will process other special information only if we obtain your consent or have another valid justification to do so.
6. **UBUNTU-BATHO**'s products and services are not targeted at children (a natural person under the age of 18 years). We will not knowingly collect Personal Information in respect of children without express permission to do so from a competent person (any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child)

3. **HOW WE COLLECT YOUR PERSONAL INFORMATION**

1. Direct or active collection from you

1. We may require that you submit certain information to enable you to access portions of the Website, to make use of our online services, to purchase our goods or services, to facilitate the conclusion of an agreement with us, or that is necessary for our fulfilment of our statutory or regulatory obligations. We also collect Personal Information directly from you when you communicate directly with us, for example via e-mail, telephone calls, feedback forms, site comments or forums.
2. If you contact us, we reserve the right to retain a record of that correspondence, which may include Personal Information.

3. The Personal Information that we actively collect from you may include any of the Personal Information listed in clause 2 of this Privacy Statement.

2. Personal Information collected from third parties and sources

    1. **UBUNTU-BATHO** receives Personal Information about you from various third parties and public sources, including:

        1. third party service providers, such as credit vetting agencies and through bank and identity verification processes;

        2. third parties who provide Personal Information to data controllers, and who in turn provide this Personal Information to **UBUNTU-BATHO**; and

        3. our information technology suppliers.

4. **HOW WE USE YOUR PERSONAL INFORMATION**

    1. We use the Personal Information we collect from you to maintain and improve the experience of our users, to facilitate the sale of our products and the provision of our services and to fulfil our statutory and regulatory obligations.

    2. We may also use your Personal Information to:

        1. maintain and update our customer, or potential customer, databases;

        2. retain and make information available to you on the Website;

        3. provide you with marketing material that is relevant to you;

        4. diagnose and deal with technical issues and customer support queries and other user queries;

        5. protect our rights in any litigation that may involve you;

        6. for security, administrative and legal purposes;

        7. comply with our statutory obligations, including submissions to the Companies and Intellectual Property Commission ("**CIPC**"), as well as engaging with regulatory authorities;

        8. for customer relations purposes;

        9. conduct **UBUNTU-BATHO**'s recruitment and hiring processes, which includes the conducting of criminal record and credit checks, referrals, the capturing of applicant's details and the providing of status updates to job applicants;

10. to fulfil any contractual obligations that we may have to you or any third party;
11. communicate with you and retain a record of our communications with you and your communications with us; and
12. for other lawful purposes that are relevant to our business activities or regulatory functions.

3. **UBUNTU-BATHO** will restrict its processing of your Personal Information to the original purpose for which it was collected, unless UBUNTU-BATHO reasonably considers that it is necessary to process it for another purpose that is compatible with the original purpose.
4. **UBUNTU-BATHO** may, where permitted or required to do so by applicable legislation, process your Personal Information without your knowledge or consent, and will do so in accordance with the further provisions of this Privacy Statement.

5. **COMPULSORY PERSONAL INFORMATION AND CONSEQUENCES OF NOT SHARING WITH US**

Where **UBUNTU-BATHO** is required to process certain Personal Information by law, or in terms of a contract that we have with you, and you fail to provide such Personal Information when requested to do so, **UBUNTU-BATHO** may be unable to perform in terms of the contract we have in place or are trying to enter into with you. In this case, **UBUNTU-BATHO** may be required to terminate the contract and/or relationship, upon notification to you, which termination will be done in accordance with the terms of the contract and all applicable legislation.

1. **SHARING OF YOUR PERSONAL INFORMATION**

    1. We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission, as permitted by applicable law or in the manner as set out in this Privacy Statement.
    2. **UBUNTU-BATHO** may share your Personal Information under the following circumstances:
        1. with our agents, advisers, service providers and suppliers that have agreed to be bound by this Privacy Statement or similar terms, which offer the same level as protection as this Privacy Statement;
        2. with our employees, suppliers, service providers, contractors and agents if and to the extent that they require such Personal Information in the provision of services for or to us, which include hosting, development and administration, technical

support and other support services relating to the Website or the operation of **UBUNTU-BATHO**'s business. We will authorise any Personal Information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;

3. to enable us to enforce or apply any other contract between you and us;
4. to protect our rights, property or safety or that of our customers, employees, contractors, suppliers, service providers, agents and any other third party;
5. to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;
6. with governmental agencies and other regulatory or self-regulatory bodies, if required to do so by law or if we reasonably believe that such action is necessary to:
    1. comply with the law or with any legal process;
    2. protect and defend the rights, property or safety of **UBUNTU-BATHO**, or of our customers, employees, contractors, suppliers, service providers, agents or any third party;
    3. detect, prevent or manage actual or alleged fraud, security breaches, technical issues, or the abuse, misuse or unauthorised use of the Website and contraventions of this Privacy Statement; and
    4. protect the rights, property or safety of members of the public (if you provide false or deceptive information or misrepresent yourself, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

2. **STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION**
    1. We store your Personal Information on our servers or those of our service providers and in hard copy format at our offices and at the storage facilities of our third party record storage and management providers.
    2. We reserve the right to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was

collected, or outside of South Africa in a jurisdiction that may not have comparable data protection legislation

3. If the location to which Personal Information is transferred and/or is stored does not have substantially similar laws to those of South Africa, which provide for the protection of Personal Information, we will take reasonably practicable steps, including the imposition of appropriate contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.
4. Please contact us if you require further information as to the specific mechanisms used by us when transferring your Personal Information outside of South Africa or to a jurisdiction that is different to the one in which we collected your Personal Information.

3. **SECURITY**

1. We take reasonable technical and organisational measures to secure the integrity of retained information and protect it from misuse, loss, alteration and destruction though the use of accepted technological standards that prevent unauthorised access to or disclosure of your Personal Information.
2. We also create a back-up of your information for operational and safety purposes.
3. We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.
4. Despite the above measures being taken when Processing Personal Information, we do not guarantee that your Personal Information is 100% secure.
5. **UBUNTU-BATHO** has implemented procedures to address actual and suspected data breaches and undertakes to notify you and the relevant regulatory authorities of breaches in instances in which **UBUNTU-BATHO** is legally required to do so and within the period in which such notification is necessary.

   **In this clause, you acknowledge that you know and you accept that technology is not absolutely secure and there is a risk that your Personal Information will not be secure when processed by means of technology. We do not promise that we can keep your Personal Information completely secure. You will not be able to take action against us if you suffer losses or damages in these circumstances.**

1. **RETENTION OF YOUR PERSONAL INFORMATION [AND SPECIAL PERSONAL INFORMATION]**

    1. We may retain and Process some or all of your Personal Information if and for as long as

        1. we are required or permitted by law, a code of conduct or a contract with you to do so;

        2. we reasonably need it for lawful purposes related to the performance of our functions and activities;

        3. we reasonably require it for evidentiary purposes; or

        4. you agree to us retaining it for a specified further period.

    2. To determine the appropriate retention period for Personal Information, **UBUNTU-BATHO** will consider, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. **UBUNTU-BATHO** will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of Personal Information.

2. **MAINTENANCE OF YOUR PERSONAL INFORMATION [AND SPECIAL PERSONAL INFORMATION]**

    1. In accordance with applicable legislation and the rules of **UBUNTU-BATHO**, UBUNTU-BATHO will take all necessary steps to ensure that the persons responsible for the maintenance of your Personal Information do so in a manner that ensures that it is accurate, complete, not misleading and is up to date.

    2. It is your responsibility to advise **UBUNTU-BATHO** or the persons responsible for the maintenance of your Personal Information should any of Personal Information we have about you be incorrect, incomplete, misleading or out of date, by notifying us at the contact details set out in clause 16.1 below.

3. **YOUR RIGHTS**

    1. Data protection laws confer certain rights on you in respect of your Personal Information, which include the right to:

        1. **Request access to your Personal Information** (commonly known as a “data subject access request”), thereby enabling you to receive a copy of the Personal Information retained about you.

2. **Request the correction of your Personal Information**, in order to ensure that any incomplete or inaccurate Personal Information is corrected.
3. **Request erasure of your Personal Information**, where there is no lawful basis for the retention or continued processing of it.
4. **Object to the processing of your Personal Information** for legitimate interest (or those of a third party) and if there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
5. **Request restriction of processing of your Personal Information**. This enables you to ask **UBUNTU-BATHO** to suspend the processing of your Personal Information in limited circumstances.
6. **Withdraw consent previously given in respect of the processing of your Personal Information at any time** which withdrawal of consent will not affect the lawfulness of any processing carried out prior to your notice of withdrawal. Withdrawal of consent may limit the ability of **UBUNTU-BATHO** or a third party to provide certain products or services to you, but will not affect the continued processing of your Personal Information in instances in which your consent is not required.

2. As far as the law allows, we may charge a fee for attending to any of the above requests, and may also refuse to carry out any of your requests in whole or in part.

4. **CHANGES TO THIS PRIVACY STATEMENT**

This Privacy Statement may be amended from time to time and we will take reasonable practicable steps to inform you when changes are made. Without limiting the manner in which we may inform you, it could be that such notification may be by way of e-mail (if you provide your e-mail address when you register to use the Website), a "pop-up" notification on the Website, or a notification when you access the Website or any online services.

1. **DIRECT MARKETING**

1. We use our marketing campaigns to offer services to potential customers and policyholders When you choose to be contacted you may be directed to a landing page on our web site and will be required to provide your consent to agree to receive marketing communication from us.

2. You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communication from us.
3. You may opt out of receiving direct marketing communication from us at any time by requesting us (in the manner set out in the communication or by contacting us at the contact details set out in clause 16) to stop providing any direct marketing communication to you.
4. If you have chosen to opt out, we may send you written confirmation of receipt of your opt out request (which may be in electronic form), and will thereafter not send any further direct marketing communication to you. Please note that you may continue to receive communication from **UBUNTU-BATHO** that is not marketing related.

2. **THIRD PARTY SITES**

    1. This Privacy Statement does not apply to the websites of any other parties, or the applications, products or services, such websites advertise and which may be linked to this Website, or websites that link to or advertise this Website. **UBUNTU-BATHO** is not responsible for the privacy practices of such third party websites.
    2. We advise you to read the privacy statement of each third party website and decide whether you agree to their privacy practices and policies, as these third party websites may also be collecting or sharing your Personal Information.

        **We are not liable if you suffer losses or damages when visiting third party websites by following a link to that website from this Website. You accept that there may be risks when you use such third party websites, and you do so at your own risk.**

1. **CONSUMER PROTECTION ACT, PROTECTION OF PERSONAL INFORMATION ACT AND OTHER LAWS**

    1. If this Privacy Statement or any provision in this Privacy Statement is regulated by or subject to the Consumer Protection Act, the Protection of Personal Information Act, 2013 ("**POPIA**") or other laws, it is not intended that any provision of this Privacy Statement contravenes any provision of the Consumer Protection Act, POPIA or such other laws. Therefore all provisions of this Privacy Statement must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Consumer Protection Act, POPIA and such other laws are complied with.
    2. No provision of this Privacy Statement :

1. does or purports to limit or exempt us from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption;
2. requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or
3. limits or excludes any warranties or obligations which are implied into this Privacy Statement by the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws or which we give under the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.

2. **QUERIES AND CONTACT DETAILS OF THE INFORMATION REGULATOR**

1. Should you feel that your rights in respect of your Personal Information have been infringed, please address your concerns to the **UBUNTU-BATHO** Information Officer at the email address mentioned in section 1.1.3.
2. If you feel that the attempts by **UBUNTU-BATHO** to resolve the matter have been inadequate, you may lodge a complaint with the South African Information Regulator. The contact details of the Information Regulator is as follows:
   The Information Regulator
   33 Hoofd Street
   ForumIII, 3rd Floor Braampark
   PO Box 31533
   Braamfontein, Johannesburg, 2017

   Complaints email: complaints.IR@justice.gov.za
   General enquiries: inforeg@justice.gov.za