



Privacy Policy

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1. DEFINITIONS

In this Privacy Policy, unless otherwise indicated or clearly apparent from the context, the following words and phrases have the meanings given to them in this clause and cognate expressions have corresponding meanings:

- 1.1 **“Applicable Laws”** means all applicable legislation, regulations, directives, practice notes or by-laws relating to this Privacy Policy.
- 1.2 **“Broker/s”** means a person registered as such with an insurance company in the Republic of South Africa and the Financial Services Board and who acts as an intermediary between the insured (customer) and insurer in, *inter alia*, procuring insurance cover or any insurance product for the customer.
- 1.3 **“Icon”** means Icon Digital Consulting (Pty) Ltd, a limited liability private company incorporated in accordance with the Laws of the Republic of South Africa with registration number 2013/133860/07.
- 1.4 **“Personal Information”** has the meaning given to it in clause 4 of this Privacy Policy.
- 1.5 **“Platform”** means Icon’s internet based system that is used to store its data, including the Personal Information.
- 1.6 **“Portal”** means the portal which may be accessed via the Website with your unique log-in details and where you may interact with Icon and access, *inter alia*, the Services and your Personal Information.
- 1.7 **“Privacy Policy”** means this document, as amended from time to time.
- 1.8 **“Services”** means the services provided by Icon which may be accessed on the Portal and those services provided by Icon to you which are detailed in any separate written agreement that you have concluded with Icon.
- 1.9 **“Website”** means Icon’s website which may be accessed at www.icononline.co.za.

2. INTRODUCTION

- 2.1 We at Icon value the importance of protecting your Personal Information.
- 2.2 This Privacy Policy explains how we collect, collate, process, store and use your Personal Information.
- 2.3 We respect your privacy and are dedicated to ensuring that your Personal Information is collected, collated, processed, stored and used in a manner consistent with all Applicable Laws.
- 2.4 We have therefore developed the following Privacy Policy to describe the ways in which we protect information that can be associated with you and can be used to identify you.

3. AUDIENCE

This Privacy Policy applies to you if you:

- 3.1 Visit our Website or Portal whether directly or redirected from a third-party website or make use of the Services.
- 3.2 Have concluded an agreement with us wherein it is specifically stated that this Privacy Policy will apply to you and/or that agreement.

4. PERSONAL INFORMATION

Personal Information includes:

- 4.1 Certain information that we collect automatically when you visit our Website or Portal or make use of the Services.
- 4.2 Certain information collected when you sign-up on our Website or Portal.

- 4.3 Certain information provided to us by the Brokers.
- 4.4 Optional information that you provide to us through social media platforms, by e-mail or otherwise.

This may include, but is not limited to:

- 4.5 Identifying information of any kind including, your name, age, date of birth, identification number, email address, physical address, contact number or online identifiers such as your internet protocol addresses.
- 4.6 Any other information such as your race, gender, sex, marital status, smoker status, language, place of birth, income, occupation, place of work or information regarding your physical or mental health status, previous and current illnesses, medical history, disabilities, financial and employment information, medical aid and insurance details.

5. **ACCEPTANCE**

- 5.1 You may not make use of the Website, Portal or Services if you are younger than 18 years of age or are not able to conclude legally binding agreements.
- 5.2 By using the Website, Portal or Services, you accept all the terms of this Privacy Policy and are deemed to have read, understood and agree to be bound by all the terms hereof.

6. **YOUR OBLIGATIONS**

- 6.1 You may only send us your own Personal Information or the Personal Information of someone else if you have their express permission to do so.
- 6.2 The Brokers must send us the Personal Information of their customers and warrant that they have the express permission of their customers to do so.

- 6.3 The Brokers specifically agree to indemnify us against all losses, damages, claims, expenses and/or costs of whatsoever nature suffered or incurred by us or instituted against us as a result of our use, collection, collation, processing or storage of the customers' Personal Information furnished to us by the Brokers.
- 6.4 You may correct or update your Personal Information by contacting us directly by email on the address set-out below, or by amending your data on the Portal.
- 6.5 It is your responsibility to keep records of your login information. From time to time we may prompt you to update your Personal Information and may request certain security information in order to verify your identity before effecting such changes.

7. MODIFICATIONS

- 7.1 We may modify this Privacy Policy from time to time.
- 7.2 If any material modifications are made to this Privacy Policy, Icon will furnish you with written notification thereof by e-mail or through our Website or Portal, before the changes are published on the Website or Portal and/or become effective.
- 7.3 If you continue to use the Website, Portal or Services after the publication of the modifications, you will be deemed to have consented to the modifications.

8. SHARING OF INFORMATION

- 8.1 We will not disclose your Personal Information to a third party unless you grant us written permission to do so or we are required or permitted to do so by any Applicable Laws.
- 8.2 We may share your Personal Information with other divisions or companies within the group of companies to which we belong, as well as affiliated companies.
- 8.3 The sharing of such information is made conditional upon strict adherence of those divisions, companies or affiliates to the terms of this Privacy Policy.

- 8.4 We may need to disclose Personal Information to our employees that require the Personal Information to do their jobs.
- 8.5 Should Icon undergo a change in ownership, or a merger with, acquisition by, or sale of assets to another entity, we may transfer our rights to the Personal Information we process to such entity. Except where such an entity is one within our company group, you will be notified of the transfer of your Personal Information.

9. **ADMINISTRATIVE NOTIFICATIONS AND DIRECT MARKETING**

- 9.1 We may send administrative messages, email updates or general emails to you regarding, *inter alia*, new or amended features or policies related to the Website, Portal, Services or otherwise.
- 9.2 By making use of the Website, Portal and Services, you consent to direct marketing by means of electronic communication from time to time.
- 9.3 Should you wish to opt-out from receiving these electronic communications, we will cease such communication:
- 9.3.1 At your written request furnished to our e-mail address set-out below.
- 9.3.2 If you click on the 'unsubscribe' feature at the bottom of certain of our electronic communications.

10. **COLLECTION AND PURPOSE**

- 10.1 Whenever you access the Website or Portal, make use of various website or portal features, tools or utilities or use or request the Services, your Personal Information will be collected.
- 10.2 We request, collect, collate, process and store your Personal Information for the purpose of providing you with access to our Services and financial products, to assist in any

transaction you request us to be involved in, to further understand your financial requirements, to manage your insurance and other policies by the Brokers, to ensure targeted marketing, to aggregate the data to monitor trends and preferences and to generate quotations.

10.3 From time to time, the Personal Information will be used to offer additional Services and information to you as we think may be reasonably appropriate.

10.4 We will not use the Personal Information for any other purpose than as set-out in this Privacy Policy without your written consent, unless we are required to do so by any Applicable Laws.

11. **COOKIES**

11.1 Icon makes use of 'cookies' - these are files stored on your device when accessing the Website or Portal and which contain personal identifier information allowing us to associate your Personal Information with a certain device.

11.2 Other entities may use their own cookies on the Website or Portal. We have no access to or control over them. Information collected by any of those cookies is governed by the privacy policy of the company that created it. As such we are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of third-party websites.

12. **SECURITY**

12.1 Icon will take all necessary precautions to ensure that the Personal Information is safeguarded from theft and unauthorised use.

12.2 The Personal Information will be stored on our Platform which uses advanced security measures to prevent interference or access from external parties.

13. **RETENTION**

- 13.1 We will keep a record of the specific purpose for which the Personal Information was collected for as long as we are required to by all Applicable Laws.
- 13.2 We will also keep a record of any third party to whom the Personal Information is disclosed, the date on which it was disclosed and the purpose for which it was disclosed in accordance with all Applicable Laws.
- 13.3 We may retain your Personal Information in physical or electronic form at our discretion.
- 13.4 Should you cease using our Services, Portal or Website, you may at any time request that we remove your Personal Information from our records.
- 13.5 If any Broker ceases to use our Services, Portal or Website, we will retain their customers' Personal Information and continue to use it in accordance with this Privacy Policy.
- 13.6 The Brokers' customers may request that we remove their Personal Information from our records.
- 13.7 We will delete or destroy all Personal Information which becomes obsolete.

14. **ACCESS TO PERSONAL INFORMATION**

You may access your Personal Information on the Portal, *alternatively*, request a copy of it by e-mail to our address set-out below.

15. **CONTACT US**

You may contact us on the following e-mail address:

Email address: icon@icononline.co.za