



Discovery Vitality (Pty) Ltd

Our Privacy Statement

DEFINITIONS

“**We**”, “**us**” and “**our**” refers to Discovery Vitality (Pty) Ltd registration number 1999/007736/07, with principle place of business at 1 Discovery Place, Sandton, 2196..

“**You**” and “**your**” refers to the main member of the Vitality Policy including the spouse and dependants on the policy.

“**Your personal information**” refers to all personal information about you, your spouse, your dependants, your beneficiaries and employees, as relevant. It includes financial information as well as information about your health, race or ethnic origin, biometrics, criminal behaviour or religion, gender, age, unique identifiers such as your identity number, policy or reference number or contact numbers and addresses.

“**Discovery Group**” includes Discovery Limited, all local subsidiaries and all foreign operations and subsidiaries.

“**Process information**” means the lawful and reasonable automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information to ensure that such processing is adequate, relevant and not excessive given the purpose for which it is processed.

“**Competent person**” means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child, for example a parent or legal guardian.

How We will process and disclose Your personal information and communicate with You

1. When you engage with us, you trust us with personal information about yourself, your family, and in some cases your employees. We are committed to protecting your right to privacy. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in line with the Protection of Personal Information Act (“POPIA”).



2. You have the right to object to the processing of your personal information. It is voluntary to accept these terms and conditions. However, we require your acceptance to activate and service your Vitality policy. This means that if you do not accept, we cannot activate and service your Vitality Policy.
3. We will keep your personal information confidential. You may have given us this information yourself or we may have collected it from other sources. If you share your personal information with any third parties, we will not be responsible for any loss suffered by you, your dependants, your beneficiaries, your spouse or your employees.
4. You warrant that when you give us personal information about your dependants, beneficiaries, spouse, or employees, you have received their permission to share their personal information with us for the purposes set out in this Privacy Statement and any other related purposes.
5. You understand that when you include other data subjects on your application to or contract with Discovery Vitality, we will process their personal information for the purposes set out in this Privacy Statement and/ or to pursue their legitimate interest.
6. If you are an employer, you agree to indemnify us against any loss or damage, direct or indirect, that an employee suffers because of the unauthorised use of your employees' personal information.
7. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent for them.
8. You agree that we may process your personal information for the following purposes:
 - 8.1. The administration of the Vitality programme;
 - 8.2. The provision of any services that you or any dependant on your Vitality policy may require;
 - 8.3. The rendering of services by Vitality;
 - 8.4. The provision of relevant information to a contracted third party who require such information to render a service to you or any dependant on your Vitality policy and only if such contracted third party agrees to keep the information confidential; and
 - 8.5. Any other purpose prescribed by law.
9. If a third party asks us for any of your personal information, we will share it with them only if:
 - 9.1. you have already given your consent for the disclosure of this information to that third party; or
 - 9.2. we have a legal or contractual duty to give the information to that third party; or
 - 9.3. for risk and fraud prevention purposes.
10. You confirm that we may share your personal information within the Discovery Group of companies for:
 - 10.1. administration,
 - 10.2. fraud prevention;
 - 10.3. to profile and analyse risk to Discovery Vitality; and
 - 10.4. where necessary to provide Group-wide services, benefits and infrastructure to help you in your personal or professional capacity.
11. You also confirm that we may share, both within the Discovery Group and with our authorised service providers, and combine all your personal information, including your unique identifiers for any one or more of the following purposes directly or through a third party:
 - 11.1. Market, promotional competitions and campaigns, statistical and academic research, including cross-company analytics;



- 11.2. to customise; enhance and /or develop our benefits and services to meet your needs;
- 11.3. to market Group-wide services to you; and
- 11.4. the conducting of surveys relating to our products and services.

- 12. You agree that your personal information may be shared with third parties such as academics and researchers, including those outside South Africa. We ensure that the academics and researchers will keep your personal information confidential and all data will be made anonymous to the extent possible and where appropriate. No personal information will be made available to a third party unless that third party has agreed to abide by strict confidentiality protocols that we require. If we publish the results of this research, you will not be identified by name. If we want to share your personal information for any other reason, we will do so only with your permission.
- 13. You authorise us to obtain and share information about your creditworthiness with any credit bureau, credit provider or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history (in accordance with the requirements of the National Credit Act and Regulations) and sharing of information for purposes of risk analysis, tracing and any related purposes.
- 14. We have the right to communicate with you electronically about any changes on your Vitality policy, including your contributions or changes and improvements to the benefits you are entitled to on your Vitality policy.
- 15. We have a duty to keep you updated about any offers and new products that any entity within the Discovery Group make available from time to time, that may have a bearing on your Vitality membership. Any entity within the Discovery Group and contracted third-party service providers may communicate with you about these.
- 16. Please let us know if you do not wish to receive any direct marketing from us.
- 17. You may opt out of electronic marketing by:
 - 17.1. Logging into your profile on www.discovery.co.za or the Discovery App;
 - 17.2. Following the unsubscribe prompts on the electronic marketing communication received;
 - 17.3. By informing your appointed financial adviser;We will store your personal information for the purpose of actioning this request and action it as soon as reasonably possible.
- 18. You have the right to know what personal information we hold about you. If you wish to access this information, please complete the Access Request Form available. This form is on the Discovery Website at <https://www.discovery.co.za/corporate/privacy/>.
- 19. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 20. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
- 21. We may keep your personal information until you ask us to delete or destroy it. We will comply with your request unless the law allows us to retain your personal information or where we deem it necessary to retain your personal information for the pursuit of our legitimate business purposes. Where we cannot delete your personal information, we will take all reasonable steps to make it anonymous.



22. You have the right to ask us to update, correct or delete your personal information by completing the Request for Deletion or Correction of Information Form available on the Discovery Website at <https://www.discovery.co.za/corporate/privacy/>.
23. Where we cannot delete your personal information, we will take all reasonable steps to make it anonymous.
24. We are required to collect and keep personal information in terms of the following laws:
- 24.1. The Companies Act 71 of 2008
 - 24.2. The Electronic Communications and Transactions Act (ECT)
 - 24.3. The Financial Intelligence Centre Act (FICA)
 - 24.4. The Financial Advisory and Intermediary Services Act (FAIS)
 - 24.5. The National Credit Act (NCA)
 - 24.6. The Consumer Protection Act (CPA)
 - 24.7. The Promotion of Access to Information Act (PAIA)
25. You agree that we may transfer your personal information outside South Africa:
- 25.1. if you give us an email address that is hosted outside South Africa; or
 - 25.2. to administer certain services, for example, cloud services.
- We will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.
26. If we become involved in a proposed or actual merger, acquisition or any form of sale of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.
27. We may change this Privacy Statement at any time. The most updated version will be always be available on <https://www.discovery.co.za/corporate/privacy/>.
28. If you believe that we have used your personal information contrary to this Privacy Statement, you have the right to lodge a complaint with the Information Regulator. However, we encourage you to first follow our internal complaints process to resolve the complaint or contact our Information Officer at privacy@discovery.co.za. If, thereafter, you feel that we have not resolved your complaint adequately kindly contact the contact the Information Regulator.

The contact details are:

The Information Regulator (South Africa)

JD House
27 Stiemens Street
Braamfontein
Johannesburg

P.O. Box 31533
Braamfontein
Johannesburg
2001
POPIAComplaints@inforegulator.org.za



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