



King Price Group Combined Website Cookie & Privacy Policy

Part A: Cookie Policy	4
1. Intro.....	4
2. How the cookie crumbles	4
3. How we use cookies.....	4
4. Interest-based advertising	5
5. Opting out of interest-based advertising	6
6. Google Analytics Advertising	6
7. Managing of Google's use of cookies.....	6
8. Google Analytics Advertising	7
9. Consent and managing cookies	7
10. Website user tracking	8
11. Changes to the policy.....	8
Part B: Privacy Policy	9
12. In a nutshell.....	9
13. Definitions	9
14. Introduction	11
15. Purpose and application	12
16. Collecting and processing of personal information/data	12
17. Consent for processing of personal information/data.....	14
18. Personal information/data for direct marketing purpose	15
19. Failure to provide personal information	15
20. Storage and retention of personal information/data	15
21. Securing personal information/data	16
22. Sharing and Disclosing Information	16
23. Provision of personal information/data to third parties.....	17
24. Transfer of personal information/data outside of South Africa.....	18
25. Access to personal information/data.....	18
26. Rights of data subjects regarding personal information/data	18
27. Deletion and de-identification	18
28. Keeping personal information/data accurate	20
29. Cost to access personal information/data	20



30. Complaints to the Information regulator.....20

31. Contacting us.....20



Part A: Cookie Policy

This Group Policy establishes the overarching principles, governance mechanisms, and control expectations applicable to the website Cookie Policy and the Privacy Policy across all entities within the King Price Financial Services ("KPFS") Group. It is intended to ensure cohesive and consistent Group-wide oversight and execution of Cookie and Privacy governance, while enabling compliance with applicable regulatory instruments and prudent risk management. This Policy embeds privacy security within the broader governance, risk and compliance management framework to promote group-wide privacy continuity and cyber resilience.

1. Intro

By using (the) this website or any of its associated pages and features (platforms), you agree and consent that we, and in some cases select third parties, can use, store and access cookies and pixels, and use other tracking methods to enable platform functionality, collect aggregated data about your use of our platforms, improve your online experience, and manage and tailor our advertising and product or service communications with you. This info doesn't ordinarily directly identify you but is aimed at providing you with a more personalised user experience when you engage with our platforms.

You have the ability to accept or decline the use of cookies. In some instances, the info obtained from cookies is shared with select third parties, which may under certain laws be considered as the 'sale of personal info', so we afford you the opportunity to opt-out of any such sharing, by disabling the use of cookies on our platforms. However, if you choose to do so, it may affect your use of our platforms and your ability to access certain product info and/or the use of the services made available on our platforms.

This cookie policy, and our privacy policy, only cover our use of cookies, and not the use thereof by any third parties. Please refer to the relevant sections in this cookie policy for more info in respect of what cookies are and how we use them, and the tracking technology we use on our platforms.

2. How the cookie crumbles

A cookie is a small, often encrypted, file that's located in browser directories. Cookies are used to help users navigate our platforms more efficiently and perform certain functions. Cookies are created when your browser loads a platform and are then stored on your browser or device so that, every time you return to that platform, your browser retrieves the relevant cookies and sends them to the servers housing the platform. Think of them as the little assistants that make your visit smoother, faster, and (hopefully) more delightful.

3. How we use cookies

Our platforms use different types of cookies. Session cookies exist just for your session on a platform, and persistent cookies exist for a period of time after your visit. First party cookies are cookies set by a platform and third-party cookies are set by third party platforms. We utilise all of these cookies on our platforms.

We mainly use first party cookies to ensure that our platforms function correctly. They don't collect any of your personally identifiable data.

We mainly use third party cookies to understand how you interact with our platforms, keep our services secure, provide ads that are relevant to you, provide you with a better user experience, and help speed up your future interactions with our platforms.



To help you understand how we use these cookies, here's more about the cookies we use:

3.1 Essential cookies

These cookies are essential for the operation of our platforms and allow us to maintain your user sessions and prevent security threats. They include, for example, cookies that enable you to log into secure areas of our platforms (like our self-service portal) when necessary, to contact us, to log into an account, or to add products to your basket and check-out securely. If you disable these cookies, you may not be able to use our platforms and the services provided thereon fully, or at all.

3.2 Analytics cookies

These cookies allow us to count the number of visitors to our platforms and to see how these users move around our platforms. We aggregate this data and analyse it to improve the way our platforms work and to enhance the user experience, for example, by improving the platform's layout. We're committed to using trusted third-party analytics providers' tools to enable this analysis.

3.3 Functional cookies

These cookies are used for streamlining and enhancing our platforms, by enabling us to perform certain non-essential functionalities on our platforms. These functionalities include embedding content like videos and sharing content from a platform to social media platforms.

3.4 Advertising cookies

These cookies record your visits to our platforms, the pages you visit, and the actions you take. We use this info to make our ads displayed (by third party advertising providers) on other platforms that you visit, more relevant. By allowing cookies on our platforms, you authorise us to share this info with third parties for this purpose. You also authorise us to use third party cookies so that we can personalise our ads to you. Our third-party ad providers set anonymous cookies on other websites that we advertise on. If you receive 1 of those cookies, we may then use it to identify you as having visited that site if you later visit our platforms. We then personalise our ads to you based on this info.

3.5 Preference cookies

These cookies allow us to provide enhanced functionality and personalisation by storing your settings and browsing preferences so that you have a better and more efficient experience on our platforms in future.

4. Interest-based advertising

Interest-based advertising is a way of serving ads on the websites you visit and making them more relevant to you and your interests. Shared interests are grouped together based upon previous web browsing activity and you're served ads that match your shared interests. In this way, ads can be made as relevant and useful as possible. Relevant ads can also be delivered based on website content you you've just viewed, which is commonly referred to as 're-marketing'.

- For more info about interest-based advertising, what it is, how it works and how to opt out, please refer to youronlinechoices.com



5. Opting out of interest-based advertising

There are a number of resources and websites that can help you opt-out of online interest-based or behavioural advertising from third party advertising agencies, including:

- youronlinechoices.com
- networkadvertising.org

Please note that opting out of online interest-based advertising using the above resources or services doesn't necessarily mean that the advertising of King Price's products and services on our own platforms will no longer be tailored or personalised to your interests. It also doesn't necessarily mean that all interest-based or behavioural advertising that you're subject to will stop, because your opt-out only applies to third parties who've subscribed to the services offered by these providers.

Opting-out doesn't automatically mean that you'll no longer be subject to any advertising when you visit or use our platforms, or any other websites or platforms you access from time to time. It simply means that the advertising you see is likely to be less relevant to your interests.

6. Google Analytics Advertising

Our platforms use Google Analytics Advertising, a web analytics and ad service provided by Google, Inc. (Google) which enables us to better understand how our platforms function and how users interact with our platforms, and to provide tailored marketing and advertising content relevant to users, thereby improving and enhancing their user experience.

Here's a summary of the features we use, their attributes, and the specific cookies that Google uses:

Feature	Description	Type of cookie
Analytics	Google uses cookies to help us analyse how users interact with our platforms, without personally identifying any users. The info generated by the cookies is transmitted to and stored by Google on servers outside South Africa and the European Economic Area. Google uses this info to evaluate your use of our platforms and compiles reports on platform activity.	The main cookie used by Google Analytics is '_ga' which enables us to distinguish between users.
Advertising	Google uses cookies for advertising, including serving and rendering ads, personalising ads, limiting the amount of times an ad is shown to a user, muting ads which users have elected to stop seeing, and also measuring the effectiveness of ads.	The main cookies Google uses in this regard are 'NID', 'IDE', 'ANID', 'DSID', '_gads', '_gac_', and '_gcl_'. These cookies are used for various purposes, including serving, rendering, personalising, muting and limiting ads

7. Managing of Google's use of cookies

[Click here](#) to refuse the use of certain cookies through your Google personalisation settings.

[Click here](#) to prevent Google's collection and use of data.



[Click here](#) for more info on Google's terms and conditions of use and data privacy.

[Click here](#) for info of the types of cookies used by Google and how you can manage the use of them.

8. Google Analytics Advertising

Our platforms use Meta Pixel, which is a small component of JavaScript code used to optimise ads to you, report on conversions across your devices, and create custom audiences in our Facebook advertising. Meta Pixel enables us to measure the effectiveness of our advertising by understanding the actions users take on our platforms.

The following info can be collected by or through the use of Meta Pixel:

8.1 Http headers

These are standard web protocols sent between browser requests and server on the internet, including IP addresses, info about web browsers, page location, and the person using the website.

8.2 Pixel-specific data

This would include Pixel ID and the Facebook cookie.

8.3 Button click data

This includes data about any buttons you click, the labels of those buttons, and any pages you visit as a result of the clicks.

8.4 Optional values

This includes info about your visits in order to create and manage custom audiences.

8.5 Form field names

This includes website field names, such as email or physical addresses, which we collect via forms on our platforms.

9. Consent and managing cookies

Essential cookies will always be active in order to provide you with services on our platforms, but we want your consent to use functional, analytics, advertising and preference cookies and other similar tech.

You may refuse to accept cookies by altering the settings on your browser. Please note though, that if you delete or disable your cookies, there may be certain areas of our platforms that may not function or be accessible to you. We may also no longer automatically recognise that you've agreed to our privacy policy, cookies policy and terms and conditions, which means we'll ask for confirmation of this along with your language and country preferences. Your opt-out preferences can be removed, so you may need to opt-out again.

Most browsers allow you to manage how cookies are set and used as you browse, as well as to clear cookies and browsing data. Depending on the browser you use, you may have settings that allow you to manage cookies on a site-by-site basis.



For more info on managing cookies, check your browser's help desk or visit allaboutcookies.org

10. Website user tracking

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services.

Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

We improve our products by using Microsoft Clarity to see how you use our website. By accepting these terms, you agree that we and Microsoft can collect and use this data. Our *privacy policy* below has more details.

11. Changes to the policy

We reserve the right to vary the terms of this cookie policy. It's your responsibility to familiarise yourself with the most recent version of the cookie policy each time you access our site.



Part B: Privacy Policy

12. In a nutshell

We may ask for your personal info, and your permission for us to use it, from time to time, but only in order to work out royal quotes, tell you things you need to know about your policy, assess claims and let you know when we launch awesome new products and, we'll only ever use your personal info in accordance with this policy. We've always looked after our clients' personal info Being POPIA-compliant is just an opportunity for us to do more and add more value!

13. Definitions

In this policy (as defined below), unless the context requires otherwise, the following terms will have the meanings given to them:

13.1 Applicable laws

Any laws applicable to personal information/data, including any statute, regulation, notice, policy, directive, ruling or subordinate legislation, the common law, any binding court order, judgment or ruling, any applicable industry code, policy or standard enforceable by law, or any applicable direction, policy or order that's given by any regulator, competent authority or organ of state or statutory industry body.

13.2 Child:

Any natural person under the age of 18 years.

13.3 Client:

Any natural person (or, where applicable) juristic person, who's concluded an agreement with King Price in terms of which such person enjoys insurance benefits against payment of monthly policy premiums.

13.4 Competent person:

Anyone who's legally competent to consent to any action or decision being taken by any matter concerning a juristic person or child, for example, a director, parent or legal guardian.

13.5 Controller:

King Price, in circumstances where it processes personal data (as defined in Article 4 of the GDPR).

13.6 Data subject:

King Price's clients, potential clients or any third party in respect of whom King Price processes personal information/data.

13.7 De-Identify:

In relation to personal information of a data subject, means to delete any information that-

- (a) identifies the data subject;
- (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or



(c) can be linked by a reasonably foreseeable method to other information that identifies the data subject

13.8 GDPR:

The General Data Protection Regulation, which is a European law that governs all collection and processing of personal data from individuals inside the European Union.

13.9 Mobile app:

King Price's digital mobile app interface which enables clients to manage their individual profiles.

13.10 Operator:

A person or entity who processes personal information/data for a responsible party.

13.11 Personal data (as defined by Article 4 of the GDPR):

Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is 1 who can be identified, directly or indirectly.

13.12 Personal Information:

Will have the same meaning as is given in Section 1 of POPIA.

13.13 Policy:

This data protection and privacy policy.

13.14 POPIA:

The Protection of Personal Information Act No. 4 of 2013.

13.15 Processing:

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information/personal data, including:

- (a) Its collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use.
- (b) Dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means.
- (c) Merging, linking, blocking, degradation, erasure or for the purposes of this definition, 'process' has a corresponding meaning.
- (d) Regulator/s
- (e) Any applicable regulatory authority, including the Information Regulator established in terms of POPIA.

13.16 Regulator/s

Any applicable regulatory authority, including the Information Regulator established in terms of POPIA.

13.17 Responsible Party:

In the context of this policy, King Price



13.18 King Price.

King Price Financial Services Proprietary Limited (reg no. 2009/012931/07) (licensed controlling company of the group) and/or King Price Insurance Company Ltd (licensed insurer and FSP (FSP no. 43862)) (reg no. 2009/012496/06) and/or King Price Life Insurance Ltd (licensed insurer and FSP (FSP no. 47235)) (reg no. 1948/029011/06).

13.19 Special personal information/data:

Personal information/data concerning, amongst other aspects contemplated in terms of Section 26 of Part B of POPIA, a data subject's religious beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric data, or criminal behaviour.

13.20 Third party:

Any employee, independent contractor, agent, consultant, broker, underwriting management agency, sub-contractor, regulator/s, user of King Price's websites or mobile app interfaces, or other representative of King Price.

13.21 UMA:

An underwriting management agency.

13.22 Website:

The website/s owned and operated by King Price inclusive of kingprice.co.za

13.23 Self-service portal:

Any of King Price's internet-based sites which enable clients to manage their individual profiles or share personal information/special personal information with King Price.

14. Introduction

This policy regulates the processing of personal information/data by King Price and sets forth the requirements with which King Price undertakes to comply when processing personal information/data pursuant to undertaking its operations and fulfilling its contractual obligations in respect of data subjects and third parties in general.

King Price places a high premium on the privacy of every person or organisation with whom it interacts or engages with and, therefore, acknowledges the need to ensure that personal information/data is handled with a reasonable standard of care as may be expected from it. King Price is therefore committed to ensuring that it complies with the requirements of POPIA, and also with the terms of the GDPR to the extent that the GDPR applies.

When a data subject or third party engages with King Price, whether physically or via any digital, electronic interface such as King Price's website, self-service portal or mobile app, the data subject or third party acknowledges that they trust King Price to process their personal information/data.

All data subjects and third parties have the right to object to the processing of their personal information/data. Acceptance of the terms and conditions contained in this policy is voluntary. King Price does, however, require the data subject or third party's acceptance to enable King Price to effectively enter into an insurance policy (non-



life or life) with a data subject, liaise with a data subject, exercise its right, or enforce obligations as they arise from the applicable relationship and comply with applicable laws.

15. Purpose and application

The purpose of this policy is to inform data subjects on how King Price processes their personal information/data, and to establish a standard by which King Price and its employees and representatives will comply in as far as the processing of personal information/data is concerned.

King Price, in its capacity as a responsible party/operator/controller (as the case may be), will strive to observe and comply with its obligations under POPIA and the GDPR (as may be applicable and to the extent necessary) when it collects and processes personal information/data from or in respect of any data subject, and will ensure that such information/data is processed where there is a legitimate basis, and in a fair, lawful and non-excessive manner.

16. Collecting and processing of personal information/data

King Price will, as far as reasonably possible, collect personal information/data directly from a data subject, unless:

- 16.1 The personal information/ data is contained or derived from a public record.
- 16.2 The data subject has consented to the collection and processing of personal information via a third party/source, and it will not prejudice the legitimate interests of the data subject.
- 16.3 The personal information/data is necessary for the conclusion or performance of a contract to which the data subject is a party.
- 16.4 The personal information/data is required by law.

Whenever any data subject completes an application form, contacts King Price electronically or telephonically, or uses one of the products, services, facilities, tools or utilities offered by King Price through its website, self-service portal or mobile app, King Price will in effect collect and process the data subject's personal information/personal data, which will be stored electronically as set out below.

From time to time, it may be that King Price has collected a data subject's personal information/data from other sources (such as a public record, or where the data subject has consented to the collection and processing of personal information via a third party/source, and it won't prejudice the legitimate interests of the data subject). In the event that a data subject has shared their personal information/data with any third parties, King Price won't be responsible for any loss suffered by the data subject, their dependents, beneficiaries, spouse/s or employees (as the case may be).

King Price will process personal information/data in order to facilitate and enhance the delivery of products and services to its members, foster a legally compliant workplace environment, as well as safeguard the personal information/data relating to any data subjects which it, in fact, holds. In such an instance, the data subject providing King Price with such personal information/data will confirm that they're a competent person and that they have authority to give the requisite consent to enable King Price to process such personal information/data.



King Price undertakes to process any personal information/data in a manner which promotes the data subject's constitutional right to privacy, retains accountability and data subject participation. In supplementation of the above, King Price will process personal information/data for the following purposes:

- 16.5 To provide or manage any information, products, or services requested by data subjects.
- 16.6 To establish a data subject's needs, wants and preferences in relation to the products/services provided by King Price.
- 16.7 To identify a data subject's risk profile and make an election as to whether King Price wishes to enter into a contractual relationship with the data subject and if so, on what terms.
- 16.8 To help King Price identify data subjects when they contact King Price.
- 16.9 To facilitate the delivery of products/services to clients.
- 16.10 To administer claims and client premiums.
- 16.11 To activate policies.
- 16.12 To allocate unique identifiers to clients for the purpose of securely storing, retaining and recalling such data subject's personal information/data from time to time.
- 16.13 To maintain records of data subjects and specifically client records.
- 16.14 To maintain third party records.
- 16.15 For recruitment purposes.
- 16.16 For employment purposes.
- 16.17 For apprenticeship purposes.
- 16.18 For general administration purposes.
- 16.19 For legal/contractual purposes.
- 16.20 For health and safety purposes.
- 16.21 To provide health and wellness information to King Price's employees and clients.
- 16.22 To retain the records of brokers.
- 16.23 To monitor access, secure, and manage any facilities owned or operated by King Price regardless of location in South Africa.
- 16.24 To transact with third parties.
- 16.25 To improve the quality of King Price's products and services.
- 16.26 To detect and prevent money laundering.
- 16.27 To analyse the personal information/data collected for research and statistical purposes.
- 16.28 To enable UMAs to process claims and discharge any functions specified in a binder agreement.
- 16.29 To help recover bad debts.
- 16.30 To transfer personal information/data across the borders of South Africa to other jurisdictions.
- 16.31 To carry out analysis and client profiling.
- 16.32 To identify other products and services which might be of interest to our clients and data subjects in general, as well as to inform them of such products/services.



16.33 To obtain and share information about a data subject's credit-worthiness and risk profile with any credit bureau or credit provider's industry association or industry body, including information pertaining to a data subject's credit history, claims history, financial history, judgements, default history and sharing information for purposes of risk analysis, tracing and related purposes.

When collecting personal information/data from a data subject, King Price will comply with the notification requirements as set out in Section 18 of POPIA, and to the extent applicable, Articles 13 and 14 of the GDPR.

King Price will collect and process personal information/data in compliance with the conditions as set out in POPIA and the processing principles in the GDPR (as the case may be), to ensure that it protects the data subject's privacy.

King Price won't process the personal information/data of a data subject for any purpose other than for the purposes set forth in this policy unless King Price is permitted or required to do so in terms of applicable laws or otherwise by law.

King Price may from time-to-time process personal information/data by making use of automated means (without deploying any human intervention in the decision-making process) to make decisions about the data subject or their application. In this instance it's specifically recorded that the data subject may object to or query the outcomes of such a decision.

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

17. Consent for processing of personal information/data

King Price may process personal information/data based on the data subject's consent, where required by law or where no other lawful basis applies. The following provisions govern the use of consent:

Obtaining Consent

Where consent is required, King Price shall:

- 17.1 Obtain voluntary, specific, and informed consent from the data subject;
- 17.2 Use the prescribed Form 4 – Consent for Direct Marketing via Electronic Communication, where applicable;
- 17.3 Maintain records of all consents obtained.

Withdrawal of Consent

A data subject may withdraw their consent at any time by submitting a written request to the Information Officer. Withdrawal shall not affect the lawfulness of processing conducted prior to the withdrawal.



Alternative Legal Grounds

Where consent is not required, King Price may process personal information/data on alternative lawful grounds as permitted under Section 11 of POPIA, including:

17.4 Performance of a contract;

17.5 Compliance with legal obligations;

17.6 Protection of legitimate interests;

17.7 Pursuit of the Company's legitimate business interests

Special Information

Where King Price processes special personal information, it shall obtain the necessary authorisation or consent in accordance with Sections 27 and 35 of POPIA, using the prescribed forms where applicable.

18. Personal information/data for direct marketing purpose

King Price acknowledges that it may only use personal information/personal data to contact data subjects for purposes of direct marketing where King Price has complied with the provisions of POPIA and GDPR (where applicable) and when it's generally permissible to do so in terms of applicable laws.

King Price will ensure that a reasonable opportunity is given to all data subjects to object (opt-out) to the use of their personal information/ data for King Price's marketing purposes when collecting the personal information/personal data and on the occasion of each communication to the data subject for purposes of direct marketing.

19. Failure to provide personal information

Where King Price is required to collect personal information/data from a data subject by law or in order to fulfil a legitimate business purpose of King Price, and the data subject fails to provide such personal information/data, King Price may, on notice to the data subject, decline to render services without any liability to the data subject.

20. Storage and retention of personal information/data

King Price will retain personal information/data it has processed, in an electronic or hard copy file format, with a third-party service provider appointed for this purpose.

Personal information/data will only be retained by King Price for as long as necessary to fulfil the purposes for which that personal information/data was collected, or as permitted in terms of applicable law.

It's specifically recorded that any data subject has the right to object to the processing of their personal information and King Price will retain and store the data subject's personal information/data for the purposes of dealing with such an objection or enquiry as soon and as swiftly as possible.



21. Securing personal information/data

King Price has implemented appropriate, reasonable, physical, organisational, contractual and technological security measures to secure the integrity and confidentiality of personal information/data, including measures to protect against the loss or theft, unauthorised access, disclosure, copying, use or modification of personal information/data in compliance with applicable laws.

In further compliance with applicable laws, King Price will take steps to notify the relevant regulator/s and any affected data subjects in the event of a security breach and will provide such notification as soon as reasonably possible after becoming aware of any such breach.

Any transmission of personal information/data will be solely at the own risk of the data subject. Once King Price has received the personal information/personal data, it'll deploy and use strict procedures and security features to try and prevent unauthorised access to it. As indicated above, King Prices reiterates that it restricts access to personal information/data to third parties with a legitimate operational reason for having access to such personal information/data. King Price also maintains electronic and procedural safeguards that comply with the applicable laws to protect your personal information from any unauthorised access.

By accepting the terms and conditions to which this policy relates, the data subject agrees to indemnify and hold King Price harmless for any security breaches which may potentially expose the personal information/data in King Price's possession to unauthorised access or the unlawful processing of such personal information/ data by any third party.

22. Sharing and Disclosing Information

King Price is committed to ensuring that the sharing and disclosure of personal information is conducted in accordance with POPIA. The following principles govern all such activities:

Lawful Basis for Disclosure

Personal information shall only be disclosed to third parties where:

- 22.1 The data subject has provided explicit consent;
- 22.2 Disclosure is necessary for the performance of a contract with the data subject;
- 22.3 Disclosure is required by law, regulation, or court order;
- 22.4 Disclosure is necessary to protect a legitimate interest of the data subject;
- 22.5 Disclosure is necessary to pursue the legitimate interests of the Company or a third party, subject to applicable legal limitations.

Third-Party Disclosures

Where personal information is shared with third parties, including service providers, reinsurers, or regulatory authorities:

- 22.6 The Company shall ensure that such third parties are contractually bound to maintain the confidentiality and security of the personal information;
- 22.7 Disclosure shall be limited to information that is strictly necessary for the intended purpose;
- 22.8 The third party shall implement security safeguards that are substantially similar to those required under POPIA.



Cross-Border Transfers

Personal information may be transferred outside the borders of South Africa only where:

22.9 The recipient country has adequate data protection laws;

22.10 The data subject has provided explicit consent;

22.11 The transfer is necessary for the performance of a contract;

22.12 The recipient is subject to a binding agreement that ensures an adequate level of protection.

Operator Engagements

Where personal information is processed by an operator on behalf of the Company:

22.13 A written agreement shall be concluded with the operator;

22.14 The operator shall be required to implement appropriate technical and organisational measures to safeguard the personal information;

22.15 The Company shall remain accountable for the processing activities of the operator.

Notification to Data Subjects

Where personal information is collected from a third party, the Company shall notify the data subject of:

22.16 The collection and source of the personal information;

22.17 The purpose of collection;

22.18 Whether the supply of information is voluntary or mandatory;

22.19 The consequences of failure to provide the information.

22.20 Security Compromise Notification

In the event of a security compromise involving shared or disclosed personal information:

22.21 The Company shall notify the Information Regulator and the affected data subjects as required under Section 22 of POPIA;

22.22 The notification shall include sufficient detail regarding the nature of the breach and recommended remedial actions.

23. Provision of personal information/data to third parties

King Price may disclose personal information/data to third party service providers where necessary to achieve the purpose/s for which the personal information/data was originally collected and processed. King Price will enter into written agreements with such third-party service providers to ensure that they comply with applicable laws pursuant to the processing of personal information/data provided to it by King Price from time to time.



24. Transfer of personal information/data outside of South Africa

King Price may, under certain circumstances, transfer personal information/data to a jurisdiction outside of South Africa in order to achieve the purpose/s for which the personal information/data was collected and processed, including for processing and storage by third party service providers.

King Price will obtain the data subject's consent to transfer the personal information/data to such foreign jurisdiction unless consent isn't required by applicable law.

The data subject should also take note that, where the personal information/data is transferred to a foreign jurisdiction, the processing of personal information/data in the foreign jurisdiction may be subject to the laws of that foreign jurisdiction.

25. Access to personal information/data

A data subject has the right to a copy of the personal information/data which is held by King Price (subject to a few limited exemptions as provided for under applicable law).

The data subject must make a written request (which can be sent by email) to the information officer(s) / deputy information officer(s) designated by King Price from time to time.

King Price will provide the data subject with any such personal information/data to the extent required by applicable law and subject to and in accordance with the provisions of King Price's PAIA manual/s published in terms of Section 51 of the Promotion of Access to Information Act 2000 (PAIA), which can be sourced on King Price's website at kingprice.co.za.

The data subject may challenge the accuracy or completeness of their personal information/data in King Price's records at any time in accordance with the process set out in King Price's PAIA manual/s.

26. Rights of data subjects regarding personal information/data

Data subjects have the right to have their personal information/data processed lawfully, which rights include the right/s to:

26.1 Request that King Price correct, destroy or delete their personal information/data.

26.2 Object to the processing of their personal information /data.

Any data subject who wants to request the correction, destruction or deletion of their personal information/data; or object to any processing of it by King Price may contact King Price's designated information officer/s / deputy information officer/s by using their contact information below.

27. Deletion and de-identification

In accordance with Section 24 of POPIA, King Price recognises the rights of data subjects to request the correction, deletion, or destruction of their personal information under the following circumstances:



Correction or Deletion of Personal Information

A data subject may submit a written request to King Price to correct or delete personal information where such information is:

- 27.1 Inaccurate;
- 27.2 Irrelevant;
- 27.3 Excessive;
- 27.4 Outdated;
- 27.5 Incomplete;
- 27.6 Misleading; or
- 27.7 Unlawfully obtained.

Deletion or Destruction of Personal Information

A data subject may request the deletion or destruction of personal information where King Price is no longer authorised to retain such information in terms of Section 14 of POPIA, including where:

- 27.8 The purpose for which the information was collected has been fulfilled;
- 27.9 The retention period has expired;
- 27.10 Continued retention is no longer lawful or necessary.

De-identification of Personal Information

Where full deletion is not feasible due to legal or operational constraints, King Price may, where appropriate, de-identify the personal information to ensure that it can no longer be linked to the data subject. De-identification shall be conducted in accordance with POPIA and applicable industry standards.

Submission of Requests

Requests for correction, deletion, or de-identification must be submitted using the prescribed Form 2 – Request for Correction or Deletion of Personal Information, available from the Information Regulator's website or this policy.

Response to Requests

King Price shall respond to such requests within a reasonable time and in accordance with the procedures set out in POPIA. Where a request is refused, the data subject shall be provided with written reasons and may lodge a complaint with the Information Regulator.



28. Keeping personal information/data accurate

King Price will take reasonable steps to ensure that personal information/data that it processes is kept updated, where reasonably possible.

King Price may not always expressly request the data subject to verify and update their personal information/data and expects that the data subject will notify King Price from time to time in writing:

28.1 Of any updates or amendments required in respect of their personal information/data.

28.2 Where the data subject requires King Price to delete their personal information/data.

28.3 Where the data subject wishes to restrict the processing of their personal information/data.

29. Cost to access personal information/data

The prescribed fees to be paid for copies of the data subject's personal information/data are listed in King Price's PAIA manual.

King Price reserves the right to make amendments to this policy from time to time.

30. Complaints to the Information regulator

In the event that any data subject or third party is of the view or belief that King Price has processed their personal information/data in a manner or for a purpose which is contrary to the provisions of this policy, the data subject is required to first attempt to resolve the matter directly with King Price, failing which the data subject or third party will have the right to lodge a complaint with the Information Regulator, under the provisions of POPIA.

The contact details of the Information Regulator are:

Physical address

JD House 27 Stiemens Street, Braamfontein,
Johannesburg, 2001

Work no.

+27 10 023 5200

Email

enquiries@info regulator.org.za

31. Contacting us

All comments, questions, concerns or complaints regarding personal information/data or this policy, should be forwarded to King Price's designated information officer/s or deputy information officer/s, as follows:

King Price Insurance Company Ltd	
Information Officer	Schalkwyk van der Merwe (Email: popi@kingprice.co.za)
Deputy Information Officer(s)	Jaco Labuschagne Quintin Herbst Shaun Rosslee Monique Manser Christopher Smith Marilize Henn Lucas Kgari Email: popi@kingprice.co.za



King Price Life Insurance Ltd	
Information Officer	William Harris (Email: lifePOPI@kingprice.co.za)
Deputy Information Officer	Bani Schmidt (Email: lifePOPI@kingprice.co.za)

Policy version no.	1
Last review date	September 2025
Frequency of review	2 years
Next review date	September 2028
Signed by the company secretary, as authorised by the Board	DocuSigned by: <i>Schalkmyk van der Merwe</i> 5071E76A0093A174