



CAMARGUE PRIVACY STATEMENT

Effective date: January 2023

Review date: January 2024

13/01/2023

Chief Operating Officer

Date

OR

**Any person duly authorised
to sign on behalf of Camargue**

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Introduction

1. At Camargue Underwriting Managers (Pty) Ltd (“Camargue”), we are committed to protecting your privacy and the integrity of your Personal Information by dealing with it in a lawful, legitimate, and responsible manner.
2. It is for the above reason that we wish to explain how we process your Personal Information, as per the Protection of Personal Information Act 4 of 2013 (“POPIA”) to ensure the conditions for lawful processing are met.

What is personal information?

3. In terms of POPIA, Personal Information is defined as: information relating to a natural/juristic person, including, but not limited to:
 - 3.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 3.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 3.3. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 3.4. the biometric information of the person;
 - 3.5. the personal opinions, views or preferences of the person;
 - 3.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 3.7. the views or opinions of another individual about the person; and
 - 3.8. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Purpose of collecting your personal information

4. As an underwriting manager, we may require your personal information for the following reasons, some of which are mandatory:
 - 4.1. processing policy applications;
 - 4.2. administering your policy;
 - 4.3. underwriting purposes;
 - 4.4. providing you with access to our products and services;
 - 4.5. monitoring and analysing conduct relating to the policy for fraud, compliance and other risk- related purposes;
 - 4.6. developing new products and services;
 - 4.7. helping us improve our offerings to you;
 - 4.8. confirming and verifying your identity or to ensure that you are our customer for security purposes;
 - 4.9. detection and prevention of fraud, crime, money laundering or other malpractice;
 - 4.10. conducting market or customer satisfaction research or for statistical analysis;
 - 4.11. auditing and record keeping purposes;
 - 4.12. in connection with legal proceedings;
 - 4.13. to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise required by law.
5. The type of information we collect shall depend on the purpose for which it is collected and used. We shall only collect information that we need for that particular purpose and no more than necessary.
6. Primarily, information shall be collected directly from you, however, we may also collect information about you from other sources, with or without your consent. The other sources consist of sources which are publicly available such as from the electoral roll, court judgements, bankruptcy, or repossessions.
7. Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

Disclosure of your personal information

8. Your Personal Information is kept confidential, however, under certain circumstances, to ensure the purpose of collection is met, we may lawfully disclose it to the following third parties:
 - 8.1. Service providers;
 - 8.2. Subcontractors;
 - 8.3. Agents;
 - 8.4. Insurers;
 - 8.5. Reinsurers;
 - 8.6. Insurance association;
 - 8.7. Medical and statutory authorities;
 - 8.8. Court of Law;
 - 8.9. Governmental bodies;
 - 8.10. Regulators.
9. We may also disclose your Personal Information, where we have a duty or a right to disclose in terms of law or industry codes, or where we believe it is necessary to protect our rights.
10. The third parties as stated above may sometimes be located outside the Republic of South Africa, in which case through legislation and binding corporate rules they are required to uphold principles for reasonable processing of Personal Information that are substantially similar to our own.
11. We have agreements and security measures in place to ensure that all third parties to whom your Personal Information is disclosed comply with the terms and provisions of POPIA. We ensure that third parties fully understand their duties and obligations in retaining the privacy and integrity of your Personal Information.

Transfers of personal information outside of South Africa

12. Camargue is a Lloyd's coverholder and therefore we are underwritten by certain underwriters at Lloyd's.
13. This means that at times, for purposes set out above, your Personal Information may be transferred outside of South Africa, specifically to the United Kingdom.
14. Through legislation, specifically the General Data Protection Regulation, upon which POPIA is based, and Lloyd's binding corporate rules, your Personal Information will be processed according to the principles for reasonable processing of Personal Information

Protecting your personal information

15. In terms of POPIA, we are required to secure the integrity and confidentiality of your Personal Information by taking reasonable measures to prevent loss, damage, unauthorised destruction, unlawful access and unlawful processing.
16. Our security policies and procedures which are reviewed on an ongoing basis include the following:
 - 16.1. Physical security;
 - 16.2. Computer and network security;
 - 16.3. Access to Personal Information;
 - 16.4. Secure communications;
 - 16.5. Security in contracting out activities or functions;
 - 16.6. Retention and disposal of Personal Information;
 - 16.7. Acceptable usage of Personal Information;
 - 16.8. Governance and regulatory issues;
 - 16.9. Monitoring access and usage of Personal Information;
 - 16.10. Investigation and reaction to security incidents.
17. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that the Personal Information that we remain responsible for, is secured. We will ensure that anyone to whom we pass your Personal Information agrees to treat it with the same level of protection as we are obliged to in terms of POPIA.
18. Where there are reasonable grounds to believe that your Personal Information has been accessed or acquired by an unauthorised person, we will notify the Regulator and you as required by POPIA.

Access to your personal information

19. You may contact our offices, at camargue@camargueum.co.za or 011 778 9140, to enquire what Personal Information of yours is held by us. We shall make the information available to you upon request after reasonable satisfaction of confirmation of your identity to us.

Correction or deletion of your personal information

20. We are required to store information which is accurate and updated. You may correct or delete your Personal Information at any time. We will take all reasonable steps to confirm your identity before making changes to your Personal Information.
21. Should you request the deletion of your Personal Information or if Personal Information is to be destroyed or deleted for another reason, the destruction or deletion of a record of Personal Information will be done in a manner that prevents its reconstruction in an intelligible form as required by POPIA.

Complaints

22. You have the right to address any complaints you may have regarding your Personal Information to our complaints department. Complaints are to be submitted in writing to complaints@camarqueum.co.za, details of which are also available on our website.
23. Alternatively, you may contact the Information Regulator (South Africa) at:

The Information Regulator (South Africa):

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints: POPIAComplaints@info regulator.org.za

General enquiries: enquiries@info regulator.org.za

The Information Regulator (South Africa) is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of POPIA.