

ELEVATE WEBSITE PRIVACY POLICY

All the legal jargon.

August 2024 | Version 2

Our Privacy Policy were last updated on 1 August 2024

Please read this Privacy Policy carefully before browsing the Elevate website and/or using any of our services and/or online digital tools provided through it. All of the provisions of this Privacy Policy are important, but please pay special attention to the parts that are in capital print. These parts contain information about provisions that have special consequences for you.



A. TERMS OF USE FOR ELEVATE APP AND SERVICES

1. Introduction

- 1.1. Elevate is a new-generation technology, wellness and life insurance business that uses data in new and innovative ways to align to incentives, more effectively meet customers' needs, and support them in living a long, healthy and prosperous life.
- 1.2. This Privacy Policy must be read together with [Elevate's Website Terms of Use](#). This will enable you to understand the manner in which Elevate will process your personal information.
- 1.3. For purposes of this Privacy Policy personal information shall mean any information of the nature contemplated in the definition of **"personal information"** in the Protection of Personal Information Act, No.4 of 2013 (**"POPIA"**).
- 1.4. When we refer to **"we"**, **"us"**, **"our"** and other similar references in this Privacy Policy, we mean Elevate Me Proprietary Limited (Registration Number: 2019/437243/07) and Elevate Life Proprietary Limited (Registration Number: 2016/001863/07), companies duly incorporated in accordance with the laws of South Africa and having their principal place of business at 2nd Floor Gateway West, 22 Magwa Crescent, Waterfall City, Midrand, 2066 (together **"Elevate"**). We are also the responsible parties in respect of personal information that we process in terms of POPIA.
- 1.5. When we refer to **"you"** and **"your"** and other similar references in this Privacy Policy, we mean a specific user of our website.
- 1.6. We do not accept any users, or representatives of users, under 18 years of age or who otherwise do not have the relevant capacity to be bound by this Privacy Policy.
- 1.7. Your continued use of our website as well as our services and online digital tools provided through it, indicates that you have both read and agree to the terms of this Privacy Policy. You cannot use our website and/or our services and/or our online digital tools provided through it, if you do not accept this Privacy Policy.

2. Application of this Privacy Policy

- 2.1. This Privacy Policy applies to the personal information Elevate collects in connection with:
 - 2.1.1. our website, <https://elevate.co.za> as well as our services and our online digital tools provided through it;
 - 2.1.2. our social media properties;
 - 2.1.3. our marketing and business development activities;
 - 2.1.4. our business communications.
- 2.2. This Privacy Policy does not apply to the personal information that we collect about employees, other personnel, contractors, or job applicants.

3. Purpose of this Privacy Policy



- 3.1. Elevate respects your privacy and is committed to protecting your personal information. The purpose of this Policy is to inform you about how Elevate processes your personal information.
- 3.2. This is our general Privacy Policy which applies across the business of Elevate, although we may have additional privacy policies that apply to specific products and/or services of Elevate.

4. Personal Information

- 4.1. Any reference to personal information in this Privacy Policy shall include personal information relating to identifiable, living natural persons and identifiable, existing, juristic persons.
- 4.2. Personal information when used in this Privacy Policy means information that can identify you as an individual or is capable of identifying you. Personal information does not include de-information or anonymised information, namely information that is stripped of all uniquely identifiable attributes and that cannot subsequently be re-identified to identify you as a person. By personal information we also do not mean general, statistical or aggregated information.

5. Special Personal Information

- 5.1. We hereby notify you that, in certain circumstances, by engaging with Elevate, we may collect certain special personal information about you. **“Special personal information”** refers to details about your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information or information about your criminal offences or convictions.
- 5.2. The processing of special personal information requires higher levels of protection. We need to have further justifications for processing special personal information. Elevate has implemented appropriate policies and safeguards, which we are required by law to maintain, to process special personal information.

6. Privacy and Security

- 6.1. Elevate has implemented reasonable technical and organisational measures to keep personal information secure and in compliance with POPIA.
- 6.2. The transmission of information via the internet may not always be completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us online and any transmission is at your own risk.
- 6.3. YOU INDEMNIFY AND HOLD ELEVATE HARMLESS FROM ANY LOSS, DAMAGES OR INJURY THAT YOU MAY INCUR AS A RESULT OF YOUR ACTS OR OMISSIONS DURING THE PROVISION OF PERSONAL INFORMATION TO ELEVATE.

7. Personal information which Elevate may process



- 7.1. Elevate may process the following personal information about you:
 - 7.1.1. name, surname and email address;
 - 7.1.2. marketing and communications information, including your preferences in respect of receiving marketing information from us and our third parties, and your communication preferences;
 - 7.1.3. brokerage house details, including:
 - 7.1.3.1. full company name, company type, company registration number, FSP number, physical address, postal address, contact number, category/ies of insurance associated with your FAIS Licence, if you hold professional indemnity insurance, percentage details of total commission for the previous year from a specific insurer / product provider, percentage details of issued shares in any insurer / product provider, whether you are an associated company of any insurer / product provider, whether your organisation meet the FAIS operational requirements, whether your organisation complies with the FAIS financial soundness requirements;
 - 7.1.3.2. key individual ("KI") / authorised signatory details, including full name and surname, South African identity number, work number, cell number, email address and whether your KI's meet the FAIS fit and proper requirements;
 - 7.1.3.3. commission preference;
 - 7.1.3.4. compliance office details;
 - 7.1.3.5. directorship details including solvency, criminal history and legal proceedings;
 - 7.1.3.6. deed of surety details;
 - 7.1.3.7. details of contracts with other insurers; and
 - 7.1.3.8. details of policyholder protection rules.
- 7.2. Elevate may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("**Aggregated Data**") for any purpose, including for know-how and research purposes. Aggregated Data may be derived from your personal information but is not always 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 Policy.

8. Purpose of processing of personal information

- 8.1. Elevate may process the personal information it collects for a number of lawful purposes including:
 - 8.1.1. to deliver relevant website content and newsletters and other information to you (which may include direct marketing material of Elevate and Elevate's affiliates);
 - 8.1.2. to manage your marketing preferences;
 - 8.1.3. to conduct market research and provide you with information about Elevate's



products or services from time to time via email, telephone or other means;

- 8.1.4. to use data analytics to improve our website, products/services, newsletters, customer relationships and experiences;
- 8.1.5. to make suggestions and recommendations to you about goods or services that may be of interest to you;
- 8.1.6. where you have unsubscribed from certain direct marketing communications, to take steps to implement your instruction;
- 8.1.7. to process your brokerage house application;
- 8.1.8. to administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- 8.1.9. for operational, marketing, auditing, legal and record keeping requirements;
- 8.1.10. to comply with requirements under applicable laws.

9. Quality of information

Elevate is obliged to keep personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information, where applicable.

10. Direct Marketing

You have the right to object to receiving direct marketing material (opt out) at any time by unsubscribing here: [mailto: support@elevate.co.za](mailto:support@elevate.co.za) or via the Unsubscribe link contained in a direct marketing email.

11. Disclosure of personal information

Elevate may share personal information with the parties set out below for the purposes set out in this Privacy Policy:

- 11.1. internally within Elevate. Elevate staff are bound by comprehensive confidentiality obligations. Our staff are given access only to information they are required to see in order for them to fulfil their responsibilities. In all cases, we provide access to the minimum amount of information;
- 11.2. Elevate Life Proprietary Limited (an authorised financial services provider with FSP licence number 50555), Centriq Life Insurance Company Ltd (a licensed life insurance company and authorised FSP with FSP licence number 7370) and Hannover Re (a reinsurer);
- 11.3. regulators and other authorities if Elevate is legally obliged to do so, or if instructed by you to do so, for purposes of preventing, detecting and reporting fraud and criminal activities, the identifying of the proceeds of unlawful activities and the combatting of crime;
- 11.4. any person if any member of Elevate is under a duty to disclose or share personal information in order to comply with any applicable laws, or to protect the rights, property or safety of Elevate, other customers or other third parties, or the reputation of Elevate.



12. Retaining and deleting your personal information

- 12.1. How long we keep your personal information will depend on the purpose for which we use it. Your personal information will be held and used for as long as permitted or required for legal, regulatory, fraud prevention and legitimate business purposes. Your personal information will not be stored for longer than is necessary for the purposes described in this Privacy Policy or as required by applicable law.
- 12.2. Please note that if you withdraw consent to the processing of your personal information, access to certain functionality on our website and the associated services and/or online digital tools will be suspended or terminated. If you opt to delete your personal information, we will permanently erase or fully anonymise your personal information but will retain some personal information for so long as we are obliged to do so under applicable law. Such information will always be maintained under the same privacy and security controls that are in place for other customers of our services.

13. Storage and transfer of your personal information

- 13.1. We may store your personal information on:
 - 13.1.1. our premises, in the form of hard copies;
 - 13.1.2. the premises of third-party service providers such as document storage service providers;
 - 13.1.3. our servers; or
 - 13.1.4. on the servers of our third-party service providers, such as IT systems or cloud hosting service providers.
- 13.2. In the event of the scenarios contemplated in clauses 13.1.2 and 13.1.4, we will ensure that we have entered into written agreements with those third-party service providers governing our relationship with them that require them to secure the integrity and confidentiality of personal information in their possession by taking appropriate, reasonable technical and organisational measures.
- 13.3. From time to time, Elevate and its third-party service providers may need to transfer to and/or store your personal information on servers outside of South Africa and we hereby notify you that such jurisdiction may not have comparable data protection legislation.
- 13.4. 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.
- 13.5. You agree that we may transfer your personal information outside the borders of the Republic of South Africa if you give us an email address that is hosted outside the Republic of South Africa.
- 13.6. 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.



14. Electronic and website links

- 14.1. Our website, newsletters and/or marketing communications may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your personal information.
- 14.2. Elevate does not control these third-party websites and is not responsible for their privacy policies. When you leave our website, we encourage you to read all applicable privacy policies.

15. Use of website cookies

- 15.1. Our website uses cookies, which are small text files sent by a web server to store on a web browser. They are used to ensure websites function properly, store user preferences when needed and collect anonymous statistics on website usage.
- 15.2. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website. If you accept a “cookie” or fail to deny the use of “cookies”, you agree that we may use your personal information collected using “cookies” (subject to the provisions of this Privacy Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of our website.

16. Server Statistics

We collect general statistics to track user trends on our website. These statistics include hits to our server, the types of browsers used to access our website, page views, and navigational patterns. The information that is collected in this manner does NOT provide us with any personally identifiable information about you. It helps us track “where” you are coming from. This allows us to pinpoint high-traffic areas and determine the most effective ways to communicate with you. In order to prevent the introduction of viruses and hackers into the website, we may collect information, such as IP addresses, into a log file to be used to identify potential hackers of the website.

17. What rights do users have?

- 17.1. By law, you have a number of rights (subject to certain conditions) when it comes to your personal information. Further information and advice about your rights can be obtained from the Information Regulator (South Africa), established in terms of section 39 of POPIA (“Information Regulator”). You can exercise any of these rights by contacting us through our details below. These rights include the following:



Rights	What does this mean?
The right to object to processing	You have the right to object to processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.
The right to be informed	You have the right to be informed that personal information about you is being collected, where the information is being collected from and the purpose for which the information is being collected.
The right of access	You have the right to access your personal information, subject to certain rights of the discloser to refuse access to this information in terms of the Promotion of Access to Information Act2 of 2000. This right can be exercised in accordance with the Elevate PAIA manual.
The right to correction, destruction of deletion	You are entitled to have your personal information corrected if it is inaccurate or incomplete, destroyed and/or deleted subject to applicable law.
The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal information with the Information Regulator.
The right to withdraw consent	If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your information with your consent up to that point is unlawful).Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, and it will not affect the processing of your personal information where consent is not required Please also note that such withdrawal in certain circumstances may mean that you can no longer continue to use certain functionality on our website and/ or services and/or online digital tools provided through it.



- 17.2. We usually act on requests and provide information free of charge but may charge a reasonable fee to cover our administrative costs or where applicable, a fee as prescribed by applicable law.

18. Complaints

- 18.1. If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached POPIA, you are encouraged to contact our Information Officer at the contact details set out below.
- 18.2. Should you remain dissatisfied, then the Information Regulator is the competent authority to deal with complaints and claims in relation to non-compliance with the personal information protection requirements under POPIA. The Information Regulator's contact details are available at <https://inforegulator.org.za/contact-us/>.

19. Changes to this Policy

- 19.1. Elevate keeps this Privacy Policy under regular review and reserves the right to make amendments to this Privacy Policy from time to time.
- 19.2. Any such amendment will come into effect when published on our website.
- 19.3. The latest version of this Privacy Policy will govern the respective rights and obligations between you and Elevate pertaining to the processing of your personal information, each time that you access and use our website as well as services and online digital tools provided through it.
- 19.4. You must ensure that you obtain the latest version of this Privacy Policy before any action is taken based hereon. It is your responsibility to check our website often.
- 19.5. Your continued use of our website following our publication of a new version of the Privacy Policy will constitute your consent to the terms of the new version of the Privacy Policy.

20. Contact Elevate:

- 20.1. You can contact the Information Officer of Elevate who:
- 20.1.1. is responsible for ensuring implementation and compliance with this Privacy Policy; and
 - 20.1.2. may be contacted at info@elevate.co.za, if you have any comments, questions and/or requests regarding this Privacy Policy.