



Elevate Life (Pty) Ltd.

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Privacy and Information Protection Policy

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Table of Contents

1. Introduction.....	1
2. Policies Statement.....	1
3. Scope of this Policy	1
4. Application of this Policy.....	1
5. Definitions used in this policy	2
6. Privacy Laws adherence.....	4
7. Responsibilities and roles for privacy.....	4
8. Policy Framework	5
8.1. Company overview.....	5
8.2. Privacy Categories	5
8.3. Principles and Conditions.....	6
9. Training	13
10. Dissemination and implementation.....	14
11. Monitoring.....	14
12. Review.....	16
Appendix A – Applicable Republic Regulations.....	17

1. Introduction

Elevate Life is an insurance provider domiciled in the Republic of South Africa. Elevate Life is committed to good governance for long term sustainability and in balancing the interests of our all our stakeholders. This policy sets out our commitment to all our stakeholders to ensure their Right to Privacy and that the information we process on their behalf is protected against unlawful collection, retention, dissemination, and use.

2. Policies Statement

The Board of Directors and management of Elevate Life are located at Ground Floor, Block J, 400 16th Road, Central Park, Midrand are committed to compliance with all applicable South African laws and any additional regulations contractually agreed with our clients, in respect of personal information, and the protection of the “rights and freedoms” of persons whose information Elevate Life collects and operates in accordance with the Protection of Personal Information (POPI) Act (2013).

The objective of this Policy is to clearly define Elevate Life’s governance approach in terms of the protection of personal information and special personal information.

Elevate Life respects a person’s right to privacy and will take appropriate precautions to keep personal information confidential and protected. With this objective in mind, Elevate Life will put the necessary steps in place to ensure compliance with the principles set out in the POPIA as well as complementary international privacy best practices. Detailed objectives and tracking of the implementation for Privacy and information protection and the underlying management system are detailed in the Elevate Life: Privacy and PIMS Objectives Record.

3. Scope of this Policy

This document provides the overarching framework for the implementation and monitoring of Privacy Policies, Procedures, Standards and Forms across all areas in Elevate Life. This policy is closely aligned with the Elevate Life: Security and Privacy Policy which aims to ensure security controls are adequate to protect the information flows both in transit and at rest.

4. Application of this Policy

This policy applies to all employees, contractors and data processing outsourced suppliers.

For employees, any breach of this policy will be dealt with under the Elevate Life Disciplinary Policy, whereby any employee will be dismissed for any serious deviation from this policy. Furthermore, deviation from this policy may also be a criminal offence, in which case the matter will be reported as soon as possible to the appropriate authorities.

Contractors and any third parties, working with, or for Elevate Life, and who have access to personal information, will be required to have read, understood and to comply with this policy. No third party may access personal information held by Elevate Life without having first entered into a data confidentiality

agreement, which imposes on the third party, obligations no less onerous than those to which Elevate Life is committed, and which gives Elevate Life the right to audit compliance with the agreement. Contracts will be terminated upon breach of this contract and reported to the relevant authorities.

5. Definitions used in this policy

The following key terms are used in this document:

- **“biometrics”** means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition
- **“child”** means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself
- **“data”** means information in raw or unorganised form such as alphabets, numbers or symbols that refer to or represent, conditions, ideas, or objects. Data is limitless and present everywhere in the universe.
- A **“data subject”** is the person to whom the personal information relates.
- **“de-identify”**, in relation to personal information of a data subject, means to delete any information that
 - Can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
 - Can be linked by a reasonably foreseeable method to other information that identifies the data subject,

And de-identified has a corresponding meaning.

- **direct-marketing** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of—
 - Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
 - Requesting the data subject to make a donation of any kind for any reason
- **ECTA** means the Electronic Communications and Transactions Act, 2002 (Act no. 25 of 2002)
- **“electronic communication”** means any text, voice, sound, or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient”
- **“enforcement notice”** means a notice issued in terms of section 95 of POPIA.
- **“Information”** means data that is accurate and timely, specific and organised for a purpose, presented within a context that gives it meaning and relevance, and can lead to an increase in understanding or a decrease in uncertainty. It is valuable as it can effect a behaviour, a decision or an outcome.
- **Information Officer** In the case of a public body means the Chief Executive Officer or equivalent officer of that public body who is acting as such
- **“knowledge”** means human faculty resulting from interpreted information, an understanding that germinates from a combination of data, information, experience, and human interpretation. In an organisation or group context, knowledge is the sum of what is known and resides in the intelligence and competence of the people

- An "**operator**" is the person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party
- **PAIA** means the Promotion of Access to Information Act
- A **Person** refers to a natural or juristic person
- **personal Information** is Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable existing juristic person, including, but not limited to:
 - (a) 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 an individual;
 - (b) information relating to the education or the medical, financial, criminal or employment history of the person;
 - (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - (d) the biometric information of the person;
 - (e) the personal opinions, views or preferences of the person;
 - (f) 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;
 - (g) the views or opinions of another individual about the person; and
 - (h) 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 .
- **POPIA** means the Protect of Personal Information Act, 2013 (ACT NO. 4 OF 2013)
- "**private body**" means –
 - a. A natural person who carries or has carried out any trade business or profession, but only in such capacity;
 - b. An existing juristic person but excludes a public body
- "**processing**" means any operation or activity or any set of operations whether or not by automatic means, concerning personal information, including –
 - a. the 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; or
 - c. merging, linking, as well as restriction, degradation, erasure or destruction of information
- "**professional legal advisor**" means any legally qualifies person, whether in private practise or not, who lawfully provides a client, at its request, with independent, confidential legal advice
- "**public body**" means any department of state or administration in the national or provincial sphere of government or any functionary or institution exercising a power or performing a duty in terms of any legislation;
- "**public record**" means a record that is accessible in the public domain and which is in the possession of or under the control of a public body whether or not it was created by that public body
- "**record**" means any recorded information regardless of form or medium

- The "**Regulator**" is the information regulator established in terms of section 39 of POPIA; the Regulator is a juristic person, whose functions include monitoring and enforcing compliance by public and private bodies with the provisions of POPIA.
- "re-identify" means to resurrect any information that has been de-identified that can be used by a reasonably foreseeable method to identify the data subject
- "**Republic**" means the Republic of South Africa
- A "**responsible party**" is the public or private body or person which, alone or in conjunction with others, determines the purpose of and means for processing personal information; this reference is akin to the "**controller**" as defined in the Privacy Shield Framework.
- "**special personal information**" as per POPIA (26) means personal information concerning religious or philosophical beliefs, race and ethnic origin, trade union membership, political persuasion, health or sex life, biometric information of a data-subject; criminal behaviour of a data-subject to the extent that such information relates to the alleged commission by a data subject of any offence or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
- "**unique identifier**" means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

6. Privacy Laws adherence

As a juristic person domiciled in the Republic, Elevate Life is bound by the POPIA comprehensive privacy framework. In addition to POPIA, based on Elevate Life's privacy research, it is acknowledged that a number of Acts of the Republic described in (Appendix A) must also be taken into account with regard to the obligations of information records and privacy matters.

7. Responsibilities and roles for privacy

Ultimate accountability for the long-term sustainability of Elevate Life rests with the Board of Directors including the strategic direction and compliance with laws and regulations.

Top management and all those in managerial or supervisory roles throughout Elevate Life are responsible for developing and ensuring good information handling practices within Elevate Life, Responsibilities include:

- Communicating support for ensuring privacy and information security to all impacted stakeholders
- establishing the required functions, roles and responsibilities and required training for effective privacy practices
- ensuring the effective implementation of automated processes and IT systems to streamline the necessary controls for identification and management of PI
- monitor the overall implementation of Privacy to ensure it is aligned with Elevate Life's strategy and risk appetite.

All Employees are responsible for ensuring that any personal information that Elevate Life holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorised by Elevate Life to receive that information and has entered into a confidentiality agreement.

In terms of POPIA (53) a duly appointed Information Officer is a member of the senior management team and is accountable to the Board of Directors of Elevate Life for the management of personal information within Elevate Life and for ensuring that compliance with data protection legislation and good practice can be demonstrated. This officer will be registered as per POPIA (55) as soon as the Republic's Regulator is ready. The Elevate Life Information Officer is expected to maintain expert knowledge of privacy laws and practices, as well as other professional qualities, to ensure that Elevate Life complies with the requirements of the POPIA and relevant information protection law(s) and regulations and client privacy and information protection requirements.

The Elevate Life Security Officer is responsible for ensuring the information received from, and sent to, third parties is secure and information stored is adequately protected, including all aspects related to ensuring only authorised access is provided to the information and that personal information is anonymised adequately to minimise the risk of de-identification. The Security Officer is the owner of the Elevate Life Security and Privacy Policy and is responsible for ensuring it is kept updated and is implemented.

8. Policy Framework

8.1. Company overview

In terms of the South African Protection of Personal Information Act (POPIA), Elevate Life is a private juristic person offering insurance and intermediary services to private juristic persons across South Africa.

Elevate Life largely fulfils an "Responsible Party" and "Operator" roles by analysing and reporting on data provided by our customers, who are themselves also the "Responsible Party" in terms of the "data-subject".

In terms of any personal information collected directly from a data-subject, where Elevate Life is the Responsible Party, Elevate Life will ensure conformance with the conditions set out in the principles and conditions below and defined in POPIA (Ch3). In addition, Elevate Life will maintain and track privacy related risks in the Elevate Life Risk Register.

It is Elevate Life handles identifiable personal information on behalf of its customers to perform the functions of its ordinary course of business. As such, precautions are applied to ensure data within Elevate Life's control is treated with confidentiality and the utmost care to avoid useful personal information being available to adversaries.

8.2. Privacy Categories

Elevate Life is aware that privacy has multiple, often overlapping, dimensions, namely:

- Privacy of person
- Privacy of behaviour and actions
- Privacy of communications
- Privacy of information
- Privacy of thoughts and feelings
- Privacy of location and territory

These dimensions will be considered in the ongoing considerations for a person's right to privacy as new technologies and risks emerge, even if legislation lags the curve.

8.3. Principles and Conditions

Elevate Life as Responsible Party and Operator will ensure conditions of lawful processing that are within its control. These will include the conditions as defined in POPIA (Ch3).

All processing of personal information will be conducted in accordance with Elevate Life's Privacy and Information Protection Principles and Conditions as set out in this section.

8.3.1. Accountability

Where Elevate Life is the Responsible Party, Elevate Life will be accountable for ensuring all the conditions set out in POPIA, and all the measures that give effect to such conditions are complied with at the time of the determination of the purpose and means of the processing as well as during the processing itself.

Where Elevate Life assumes an operator role, Elevate Life will contract with the Responsible Party to confirm the relevant permissions for PI have been obtained.

Elevate Life will take reasonably practicable steps to ensure that PI information stored and processed is obtained from a legitimate, lawful source and will not prejudice a legitimate interest of the data subject.

8.3.2. Processing limitation

Personal Information will be processed:

- in a lawful and reasonable manner for which consent was granted
- only for the original agreed purpose specified and explicitly defined
- in a manner that is adequate, relevant, and not excessive, protects the legitimate interest of the data subject or responsible party, does not infringe their privacy, or as required by law

Elevate Life will obtain implicit or explicit consent prior to

- commencing collection activities, as appropriate and according to what the corresponding regulation mandates for the associated situation, with respect to the collection, use and disclosure of personal information.
- using the personal information for other purposes beyond those for which the personal information was originally collected
- the transfer of personal information to third parties and other jurisdictions

All Personal information under Elevate Life's control will:

- be retained as per Elevate Life Retention of Records Procedure, and in line with any statutory obligations, not be stored for periods longer than permitted by law or consent as documented in the Elevate Life Retention and Disposal Schedule,
- once its retention date is passed, it will be securely deleted as per the Elevate Life Security and Privacy policy and the Elevate Life Secure Disposal of Storage Media Procedure,
- on an annual basis, the information officer will review the Elevate Life Data Inventory and validate any data that has expired and not yet deleted and take appropriate action

- any data retention that exceeds the retention periods defined in the procedure must be given written approval and signed off by the Information Officer with corresponding justification
- any personal information that is retained beyond the processing date, must be encrypted or anonymised in order to protect the identity of the data subject in the event of a data breach as per the Elevate Life Data Anonymisation Procedure.

In addition, Elevate Life will:

- ensure that any notification received regarding change of circumstances is recorded and acted upon.
- Ensure personal information is not kept in a form that permits identification of data subjects for longer than is necessary and in relation to the purpose(s) for which the data was originally collected
- Implement appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject where personal information is to be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

8.3.3. Purpose Specification

Personal Information will be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the responsible party.

Steps will be taken in terms of POPIA18(1) to ensure that the data subject is aware of the purpose of the collection of the information, unless required by law, during the Elevate Life Consent Procedure.

The Elevate Life Privacy Procedure sets out the relevant procedures for ensuring data obtained is limited to the specified purposes. Evidence of procedures followed are recorded in the Elevate Life Privacy Register of Processing including any deviations and notifications reported to the Registrar.

As per the defined procedure, Elevate Life's Information Officer is responsible for ensuring that Elevate Life does not collect information that is not strictly necessary for the purpose for which it is obtained.

All data collection forms (electronic or paper-based), including data collection requirements in new information systems, will include a fair processing statement or link to the Elevate Life Privacy Statement and be approved by the Information Officer. It is also the responsibility of the data subject to ensure that data held by Elevate Life is accurate and up to date. Completion of a registration or application form by a data subject must include a statement that the data contained therein is accurate at the date of submission and that they are required to notify Elevate Life of any changes in circumstance to enable personal records to be updated accordingly. Instructions for updating records must be made available.

As a data provider, Elevate Life will ensure that Personal Information that is used on an ongoing basis, including information that is disclosed to third parties, will generally be accurate, complete and up to date to the extent necessary:

- for the purposes of use; and
- to minimize the possibility that inappropriate or inaccurate information may be used to make a decision about the data subject.

Elevate Life will not update personal information unless such a process is necessary to fulfil the purposes for which the information was collected.

8.3.4. Further Processing limitation

Further processing of personal information will be in accordance or compatible for the purpose for which it was collected.

Elevate Life will assess whether the further processing is compatible with the purpose of collection as set out in the Elevate Life Privacy Procedure and applying the data privacy impact assessment tool. Dependent on the nature of processing, various aspects are taken into consideration such as:

- The relationship between the purpose of the intended further processing and the purpose for which the information has been collected
- The nature of the information concerned
- The consequences of the intended further processing for the data subject
- The way the information has been collected.
- Any contractual rights and obligations between Elevate Life and the other contracted parties and data subjects; and
- Further processing required by law

8.3.5. Information quality

The Elevate Life Data Inventory will record all issues and limitations regarding data accuracy and steps to be taken to rectify.

Where Elevate Life may have passed inaccurate or out-of-date information to third-party organisations, Elevate Life will make appropriate arrangements to inform them that the information is inaccurate and/or out of date and is not to be used to inform decisions about the individuals concerned; and for passing any correction to the personal information to the third party where this is required.

8.3.6. Openness, transparency, and notice

Elevate Life will maintain the documentation of all its processing operations as required by POPIA (14) (51).

Elevate Life's Privacy Notice Procedure is set out in the Elevate Life Privacy Notice. Privacy Notices issued, conditions for processing and withdrawals are recorded in Elevate Life's Privacy Notice Register which is open for inspection by the Registrar and impacted parties.

Elevate Life will continue to make efforts to ensure its Privacy Notices are understandable and accessible and communication with data subject's is in an intelligible form using clear and plain language.

Where Elevate Life is the responsible party, data subjects will be provided:

- Elevate Life's name, address
- the contact details of the Information Officer.

When collecting and using personal information where the data-subject will be identifiable, Elevate Life will:

1. describe and specify the purpose(s) for which personal information is collected in the privacy notice or other means of communication, when the request for personal information is made, ensuring

that the choices available to the data subject are understood (e.g., for accessing, updating, restricting access to their associated personal information)

2. describe the laws authorising or requiring the information.
3. advise whether the collection is voluntary or mandatory.
4. advise the consequences of failure to provide the information.
5. advise on any intention to transfer the information to a third country or International organisation and the level of protection afforded to the information by that third country of international organisation.
6. align the subsequent uses of the personal information with the purpose(s) provided, as well as with the consents obtained, and compliant with, associated legal requirements for use limitation.
7. Communicate when necessary with the Registrar about issues regarding legitimate purposes and use limitations.

On request, Elevate Life will provide the following information to data subjects:

- Clear and easily accessible information about its privacy management program, policies and practices. Such practices will also be provided to whoever requests such information to support transparency and legitimacy.
- Elevate Life's privacy notice and accurate details about:
 - the personal information that is being collected, derived, and processed
 - the purpose(s) for these actions.
 - to whom and to which jurisdiction the personal information might be disclosed or transferred.
 - the identity of the responsible party including information on how to contact the responsible party.
 - whether the source was obtained from the data subject(s) or from other sources.
- When processing information Elevate Life will ensure the relevant consent was provided by the data-subject and responsible party and cease processing as soon as is reasonably possible when a consent withdrawal is received.

8.3.7. Security Safeguards

Elevate Life will secure the integrity and confidentiality of all personal information in its possession or under its control and put the appropriate security safeguards in place as per the Security Policy to ensure that any personal information held is kept securely and is not, under any conditions, disclosed to any third party unless that third party has been specifically authorised by the responsible party to receive that information and has entered into an agreement to ensure confidentiality.

Elevate Life will identify and assess all reasonably foreseeable internal and external risks to personal information in its possession or under its control. During the assessment, the extent of the possible damage or loss that might be caused to persons, as well as to Elevate Life's reputation and trust relationships, will be considered should a breach occur to inform the controls required in alignment with the existing information security policies and applicable laws and regulations that Elevate Life has already implemented.

Reasonable technical and organisational measures shall be taken to prevent unauthorised access, processing, loss, damage, or destruction of personal information.

Where Elevate Life is the Responsible Party Elevate Life shall:

- establish and maintain appropriate security safeguards as reasonably required
- regularly verify safeguards to ensure they are effectively implemented
- continually update in response to new risks or deficiencies in previously implemented safeguards
- notify the Regulator; and, where applicable, the data subject; of any personal information under Elevate Life's control that is reasonably believed to have accessed or acquired by unauthorised persons as soon as reasonably possible after the discovery of the compromise, taking into account the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of Elevate Life's information system as per the Elevate Life Incident Response Procedure, and any specified manner by the Regulator.

Where Elevate Life is the operator, processing information on behalf of the Responsible Party, Elevate Life shall ensure contractual arrangements for safeguards are agreed upfront with the Responsible Party, including alignment of risk identification methods and security controls and procedures as required by POPIA (20) (21). Elevate Life will notify the responsible party immediately where there are reasonable grounds to believe that any personal information provided by the responsible party to Elevate Life has been accessed or acquired by any unauthorised person.

All personal information will be made accessible only to those who need to use it, and access may only be granted in line with the access controls as detailed in the Security Policy. Security of local and wide area networks

- Privacy enhancing technologies such as pseudonymisation and anonymisation.
- Identifying appropriate international security standards relevant to Elevate Life
- the imposition of contractual obligations to take appropriate security measures when transferring data outside of the Republic.

Elevate Life shall establish methods to prevent, identify quickly, respond to, and effectively mitigate privacy breaches. Elevate Life shall:

- Establish a documented policy and supporting procedure for identifying, escalating and reporting incidents of personal information breaches to data subjects and relevant data protection authorities, as necessary, in a timely manner, to mitigate potential legal and reputational risk.
- Maintain records of all personal information breaches including incident details, actions and progress with investigation, remediation and monitoring the progress until the incident is closed.
- Implement remediation actions to prevent reoccurrence of personal information breaches of a similar nature.

8.3.8. Data subject participation

Elevate Life acknowledges the rights of Data Subjects and will ensure they may exercise their rights:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing likely to cause damage or distress.
- To prevent processing for purposes of direct marketing.
- To be informed about the mechanics of automated decision-taking process that will significantly affect them.
- To not have significant decisions that will affect them taken solely by automated process.
- To take action to rectify, block, erase (including the right to be forgotten), or destroy inaccurate data.
- To request the Regulator to assess whether any provision of the POPIA regulation has been contravened.
- To have personal information provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- To object to any automated profiling that is occurring without consent.

Elevate Life ensures that data subjects may exercise these rights.

Having received adequate proof of identity, Elevate Life will provide data subjects the following rights and capabilities:

- Confirm, free of charge, whether or not Elevate Life holds personal information about the data subject.
- Provide the record of personal information about the data subject including a description of the personal information held and identity of all third parties, or categories of third parties, who have or have had access to the information in a reasonable manner, format and generally understandable form, within a reasonable time and at a prescribed fee if applicable.
- provide the data-subject in upfront and in writing, the applicable fees for services requested.
- access to their personal information in full or part for which Elevate Life is legally obliged.
- provide lawful grounds for refusal of any access to records requested based on POPIA (Ch4(2)); PAI-A (Ch4(3)(30)(61) in full or part.
- correction, deletion, destruction of personal information about the data-subject in Elevate Life's possession or control that is inaccurate, misleading and/or obtained unlawfully or without consent that is not in accordance with the interests of the public and/or Responsible Party

To give effect to the data subject's rights, Elevate Life will put in place:

- The Elevate Life Access Request Procedure provides confirmation from Elevate Life about whether Elevate Life has personal information relating to the data subjects, and when, why and where the information was obtained.
- The Elevate Life Access Request Procedure also provides data subjects with access, within a reasonable time and at a reasonable cost, if applicable, to their associated personal information, in an easy to understand format. Any associated charges should not be excessive beyond that which the associated data protection authority would consider to be appropriate.

- The identity of the individual is validated prior to Elevate Life providing the appropriate information to fulfil the data subject's request.
- The Elevate Life Complaints Procedure provides the data subject with the opportunity to challenge the accuracy or use of personal information relating to them and, if the challenge is successful, to have the personal information erased, rectified, completed or amended.
- The Elevate Life Request portability procedure provides the data subject with portability of his or her associated personal information that can allow for the data subject to move the information to a different service provider.
- The Elevate Life Consent Procedure provides the data subject the opportunity to provide consent/authorization, or deny the same, prior to the data controller continuing with the collection and use of personal information.
- The Elevate Life Request Access Procedure enables the data subject to request an accounting of disclosures that details with whom, when, why and how personal information has been shared and gives the data subject the opportunity to request restriction of uses of personal information.
- Elevate Life shall provide clearly communicated reasons why any data subject requests about personal information are denied, and the data subject will be given a process to challenge such denial.
- All requests for access to personal information can be directed as per the PAI-A (2000) in English to:
Elevate Life Information Officer
Address: Ground Floor, Block J Central, Central Park, Midrand, 1682
Email address : informationofficer@ElevateLife.co.za
Telephone: +27 11 541 0900

Any requests made on behalf of a person, are required to submit proof of the capacity in which the requester is making the request.

An individual who, because of illiteracy or a disability, is unable to make a request for access to a record, may make an oral request and the information officer will reduce the oral request to writing in the prescribed form and provide a copy thereof to the requester.

The POPIA forms are available on the Elevate Life Site under Privacy and Information Management.

8.3.9. Third Party/Vendor Management

Elevate Life shall provide ongoing oversight of third parties to which Elevate Life entrusts any type of access to the personal information for which Elevate Life is responsible. Elevate Life will:

- Implement governance and risk management processes and apply contractual, administrative and audit measures to ensure the appropriate protections and use of personal information that are transferred to, maintained, processed, controlled and/or accessible by all associated third parties
- Require all third parties with any type of access to personal information to report personal information breaches in a timely manner to Elevate Life without delay as defined by Elevate Life's contractual agreements and as required by any applicable data protection authorities.

Elevate Life employees may not disclose personal information to unauthorised third parties which includes family members, friends, government bodies, and in certain circumstances, the Police. All employees should

exercise caution when asked to disclose personal information held on another individual to a third party and will be required to attend specific training that enables them to deal effectively with any such risk. It is important to bear in mind whether or not disclosure of the information is relevant to, and necessary for, the conduct of Elevate Life's business.

All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the Information Officer.

8.3.10. Processing of personal information of children

Elevate Life currently only processes information as an operator for children under eighteen in a de-identified manner for research and reporting purposes that is in the legitimate interests of the responsible party

8.3.11. Transborder Information Flows

As regulated by POPIA (72), Elevate Life will not transfer personal information about a data-subject to a third party who is in a foreign country unless the third party, who is the recipient of the information, is subject to a law binding corporate rules or binding agreement which provide an adequate level of protection that effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural or juristic person.

Elevate Life will ensure the level of security and privacy protections of the jurisdiction to which the information is transferred is at least equivalent to the protections within the Republic and meets the requirements of the Regulator, or that a contract signed between parties establishes such requirements.

The Transfers of Personal Data to Third Countries or International Organisations Procedure includes the relevant procedures for cross border transfers and evidence is recorded in the Data Inventory_including any deviations and notifications reported to the Registrar.

Elevate Life's Information Officer is responsible for ensuring that the necessary authorisations are obtained from impacted parties and the Regulator if required.

9. Training

Periodic privacy training and ongoing awareness communications will be provided to existing and new employees and contractors. Training will be done at least annually or when a significant event or organizational change occurs, warranting an update.

Training and awareness activities will include role-based training, situational training and professional certifications for key workforce members based on their responsibilities and associated privacy risk.

Training and awareness communications will cover all internal privacy policies, and the enterprise privacy notices, communications with data subjects, and any other activity that involves personal information. Satisfactory privacy training completion will be tracked on the [Elevate Life Training Register](#) and documentation retained for 3 years as required by legislation.

Executive Management must promote Privacy and Information protection training and awareness programmes and make resources available in order to raise awareness.

The Information Officer is responsible for ensuring all employees are sufficiently trained on the Privacy laws and Elevate Life's Privacy and Information Security policy as detailed in the Information Officer Job description.

10. Dissemination and implementation

The dissemination and implementation of this policy shall be done through an established Privacy and Data Protection project with the full support of Elevate Life's Directors and Top management. Tracking of project progress will be monitored and guided by the project Steerco with regular audits of progress against the agreed milestones.

11. Monitoring

The Information Officer is responsible for reviewing the register of processing annually in the light of any changes to Elevate Life's activities (as determined by changes to the Data Inventory Register and the management review) and to any additional requirements identified by means of data protection impact assessments. This register needs to be available on the supervisory authority's request.

Elevate Life shall establish appropriate and consistent monitoring, measuring and reporting of the effectiveness of the privacy management program and tools and establish framework for measuring and monitoring the following:

- Effectiveness of the privacy management program.
- Level of compliance with applicable policies, standards and legal requirements.
- Use and implementation of privacy tools.
- Types and numbers of privacy breaches that occur.
- Privacy risk areas within Elevate Life.
- Third parties that have access to personal information and the associated risk levels
- Report compliance with privacy policies, applicable standards and laws to key stakeholders.
- Integrate internationally accepted privacy practices into business practices, such as those from International Organization for Standardization (ISO), the National Institute of Standards and Technology (NIST) and ISACA.
- Establish procedures that cover the use of personal information in investigating, monitoring, continuous auditing, analytics, etc. done by internal and/or external auditors.
- Anonymize data if the local/national law is not allowed to monitor pure personal information for fraud/crime prevention or other.

11.1.1. Information asset register/data inventory

Elevate Life shall establish a data inventory and data flow process as part of its approach to address risks and opportunities throughout its Privacy compliance project. Elevate Life's Data Inventory and Data Flow determine:

- business processes that use personal information.
- source of personal information.
 - volume of data subjects.
 - description of each item of personal information.
 - processing activity.
 - maintains the inventory of data categories of personal information processed.
 - documents the purpose(s) for which each category of personal information is used.

- recipients, and potential recipients, of the personal information.
- the role of Elevate Life throughout the data flow.
- key systems and repositories.
- any data transfers.
- all retention and disposal requirements.

Elevate Life is aware of any risks associated with the processing of types of personal information.

- 1.1.1 Elevate Life assesses the level of risk to individuals associated with the processing of their personal information. [Elevate Life Data Protection Impact Assessments](#) (DPIA) are carried out in relation to the processing of personal information by Elevate Life, and in relation to processing undertaken by other organisations on behalf of Elevate Life.
- 1.1.2 Elevate Life will manage any risks identified by the risk assessment to reduce the likelihood of a non-conformance with this policy.
- 1.1.3 Where a type of processing, in particular using new technologies and taking into account the nature, scope, context and purposes of the processing is likely to result in a high risk to the rights and freedoms of natural persons, Elevate Life will, prior to the processing, carry out a DPIA of the impact of the envisaged processing operations on the protection of personal information. A single DPIA may address a set of similar processing operations that present similar high risks.
- 1.1.4 Where, as a result of a DPIA it is clear that Elevate Life is about to commence processing of personal information that could cause damage and/or distress to the data subjects, the decision as to whether or not Elevate Life may proceed must be escalated for review to the Information Officer.
- 1.1.5 The Information Officer will, if there are significant concerns, either as to the potential damage or distress, or the quantity of data concerned, escalate the matter to the CEOs.
- 1.1.6 Appropriate controls will be selected from *ISO 27001, ISO 27017, ISO 27018, COBIT etc., as appropriate* and applied to reduce the level of risk associated with processing individual data to an acceptable level, by reference to Elevate Life's documented risk acceptance criteria and the requirements of the POPIA or other applicable regulations.

11.1.2. Personal Information Management System (PIMS)

In compliance with the ISO/IEC 27001 standards, Elevate Life's Board of Directors has approved and supported the development, implementation, maintenance and continual improvement of a documented personal information management system ('PIMS') for Elevate Life. All Employees, and certain external parties, will receive appropriate training.

In determining its scope for compliance with International standards and POPIA regulations and in line with Elevate Life's Privacy approach, Elevate Life has considered:

- any external and internal issues that may affect its ability to achieve the intended outcomes of its Privacy Information Management System (PIMS);
- specific needs and expectations of interested parties that are relevant to the implementation of the PIMS;
- the organisational objectives and obligations;
- the organisations acceptable level of risk; and
- any applicable statutory, regulatory or contractual obligations.

12. Review

The Information Officer shall ensure that this policy is reviewed, updated and tabled for ratification and approval by the Elevate Life Board at least on an annual basis and upon any significant change to the POPIA or additional privacy requirements from our clients.

Appendix A – Applicable Republic Regulations

A detailed context of Privacy is provided the Elevate Life Privacy Context document.

In terms of Privacy in South Africa, The Constitution is the supreme law (section 2), and the state is required to respect, protect, promote and fulfil the rights in the Bill of Rights (section 7(2)). It is binding on both state and non-state actors (section 8). All rights in the Bill of Rights can be limited by a law of general application, to the extent that the limitation is reasonable and justifiable in an open and democratic society (section 36). Certain statutes also compel organs of the state or other parties to protect private information obtained from the public, such as the National Health Act 61 of 2003; the National Credit Act 34 of 2005; the Consumer Protection Act 68 of 2008; the Electronic Communication and Transactions Act 25 of 2002; and the Promotion of Access to Information Act 2 of 2000.

ⁱ where they can be identified and not under criminal suspicion as per POPIA (22-3)(4)(5)