



health & accident
An Authorised Financial Services Provider - FSP 376

22 Stiglingh Road
Rivonia
2128
P O Box 324
Rivonia
2128
Tel: (011) 2347333
Fax: (011) 2347351

Health & Accident Underwriting Managers (Pty) Ltd (H&A)

Protection of Personal Information Policy

Effective Date: 14 August 2025

Next Review Date: August 2026

Version: 2.0

Approved by: Executive Director

1. Purpose

This policy outlines H&A's commitment to protecting personal information in accordance with the Protection of Personal Information Act (POPIA), Act 4 of 2013, and the Promotion of Access to Information Act (PAIA), Act 2 of 2000. It ensures lawful processing, safeguarding, and responsible management of personal data.

H&A, as the responsible party, accepts accountability for ensuring compliance with all eight conditions for lawful processing of personal information as set out in POPIA.

2. Definitions

- Personal Information: Any information relating to an identifiable, living natural person or juristic person.
- Data Subject: The individual whose personal information is being processed.
- Processing: Any operation involving personal information, including collection, storage, use, dissemination, or destruction.
- Information Officer: The person responsible for ensuring compliance with POPIA and PAIA.
- Deputy Information Officer: Appointed to assist the Information Officer in fulfilling their duties.

3. Scope

This policy applies to all employees, contractors, service providers, and third parties who process personal information on behalf of H&A.

4. Collection of Personal Information

H&A collects personal information for legitimate business purposes, including:

- Employment and HR administration
- Client relationship management
- Supplier onboarding and compliance
- Legal and regulatory obligations

Consent is obtained through written agreements, digital forms, or documented verbal confirmation. Data subjects are informed of the purpose and their rights at the time of collection.

Personal information collected will be limited to what is necessary for the specific purpose (principle of minimality) and will be processed only on a lawful basis, including consent, contractual necessity, legal obligation, or legitimate interest as applicable.

5. Use and Disclosure

Personal information is used only for the purposes for which it was collected. Disclosure to third parties occurs only when:

- Required by law
- Necessary for service delivery
- Consent has been obtained

All thirdparty processors must sign a Data Processing Agreement confirming POPIA compliance.

Any further processing of personal information will be compatible with the original purpose of collection, as required by section 15 of POPIA.

6. CrossBorder Data Transfers

H&A may transfer personal information outside South Africa only if:

- The recipient country has adequate data protection laws
- The data subject consents
- Binding corporate rules or agreements are in place

7. Storage and Security

Personal information is stored securely using physical, electronic, and procedural safeguards. Measures include:

- Access controls and password protection
- Encryption and secure servers
- Regular audits and vulnerability assessments

7A. Information Quality

H&A will take reasonable steps to ensure that personal information is complete, accurate, not misleading, and updated where necessary. Data verification will be conducted periodically, and updates will be requested from data subjects where appropriate.

8. Retention and Disposal

Personal information is retained only as long as necessary for its intended purpose or as required by law. Secure disposal methods include:

- Shredding of physical documents
- Permanent deletion of electronic files

Retention periods will be linked to specific categories of personal information, with clear timelines aligned to business requirements and legal obligations.

9. Data Subject Rights

Data subjects have the right to:

- Access their personal information
- Request correction or deletion
- Object to processing
- Lodge complaints with the Information Regulator

Requests must be submitted in writing to the Information Officer.

H&A will respond to data subject requests within the timelines prescribed by POPIA and PAIA, and in the manner set out in the applicable regulations.

10. Data Breach Protocol

In the event of a breach:

- The Information Officer will assess the impact and contain the breach
- Affected data subjects and the Information Regulator will be notified within a reasonable time
- A breach register will be maintained
- Remedial actions will be documented

11. Training and Awareness

All employees receive annual POPIA training, including:

- Online modules
- Inperson workshops
- Rolespecific guidance

Completion is tracked and reviewed by HR.

12. Roles and Responsibilities

- Information Officer: Darlene Hofman, registered with the Information Regulator.
- Deputy Information Officer: N/A, appointed via Annexure C.
- All Staff: Responsible for understanding and complying with this policy.

The Information Officer's duties include monitoring compliance with POPIA, handling internal POPIA queries, liaising with the Information Regulator, ensuring that a PAIA manual is available, and overseeing the training and awareness programme.

13. Insurance-Specific Processing

As a UMA, H&A processes personal information relating to policyholders, claimants, brokers, and other insurance-related parties. This may include special personal information and children's information, which will be processed only in accordance with sections 26–33 of POPIA. Where applicable, additional safeguards will be applied to protect these categories of information.

14. Annexures

- Annexure A: POPIA Compliance Checklist
- Annexure B: Data Subject Request Form
- Annexure C: Deputy Information Officer Appointment Template
- Annexure D: Consent Collection Template
- Annexure E: ThirdParty Data Processing Agreement Template



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Annexure A: POPIA Compliance Checklist

POPIA Compliance Checklist

- Personal information is collected for a lawful and specific purpose
- Data subjects are informed of the purpose and their rights
- Consent is obtained and recorded appropriately
- Information is securely stored and access is restricted
- Retention periods are defined and enforced
- Disposal methods are secure and documented
- Thirdparty processors have signed Data Processing Agreements
- Data subjects can access, correct, or delete their information
- Breach protocols are in place and tested
- Information Officer is registered with the Information Regulator
- Staff receive annual POPIA training



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Annexure B: Data Subject Request Form

Data Subject Request Form

Full Name: _____

ID Number: _____

Contact Details: _____

Type of Request:

- ☐ Access to personal information
- ☐ Correction of personal information
- ☐ Deletion of personal information
- ☐ Objection to processing

Details of Request:

Signature: _____

Date: _____

Submit this form to the Information Officer at dhofman@healthacc.co.za.



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Annexure C: Deputy Information Officer Appointment Template

Deputy Information Officer Appointment

This document confirms the appointment of:

Name: _____

Position: _____

Department: _____

As Deputy Information Officer for H&A, effective from:

Date: _____

Responsibilities include:

Assisting the Information Officer with POPIA compliance

- Responding to data subject requests
- Managing breach response procedures
- Supporting training and awareness initiatives

Approved by:

Name: _____

Position: _____

Signature: _____

Date: _____



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Annexure D: Consent Collection Template

Consent to Process Personal Information

I, _____ (Full Name and ID Number), hereby give H&A permission to collect, store, and process my personal information for the purposes outlined below:

- ☐ Employment and HR administration
- ☐ Client relationship management
- ☐ Supplier onboarding and compliance
- ☐ Legal and regulatory obligations

I understand my rights under POPIA, including the right to access, correct, and object to the processing of my personal information.

Signature: _____

Date: _____



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Annexure E: Third-Party Data Processing Agreement Template

Third-Party Data Processing Agreement

This agreement is entered into between:

H&A

And

[Third-Party Name & ID/REG NO.]

Purpose: To ensure compliance with POPIA in the processing of personal information.

Obligations of the Third Party:

- Process personal information only for the agreed purpose
- Implement appropriate security measures
- Notify H&A of any data breaches immediately
- Ensure staff are trained in data protection
- Return or securely destroy personal information upon termination

Duration: _____

Signature (H&A): _____

Signature (Third Party): _____

Date: _____