



GHT PROTECTION OF PERSONAL INFORMATION ACT POLICY

Entity Registration Number: 2014/254038/07

FSP Category: Category I (Long-term Insurance)

Date of Adoption & Implementation: 21 August 2026

1. STATUTORY INFORMATION OFFICER DESIGNATION & ADOPTION

In accordance with Section 55(1) of the Protection of Personal Information Act, No. 4 of 2013 (POPIA) and Section 17 of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA), the statutory Information Officer for GHT (Pty) Ltd is formally designated as follows:

Attribute	Official Details
Designated Information Officer	Nicole du Plooy
Executive Title	Chief Executive Officer / Director
Entity Name	GHT (Pty) Ltd
Company Registration	2014/254038/07
Direct Contact Number	073 345 3926
Official Email	nicole@policymaker.co.za
Compliance Desk Email	admin@policymaker.co.za
Head Office / Domicile	Cape Town, Western Cape, South Africa

2. POLICY INTRODUCTION & PURPOSE

2.1 Commitment to Privacy

GHT (Pty) Ltd ("GHT") is committed to protecting the privacy, confidentiality, and data integrity of all clients, employees, agents, service providers, underwriters, and external data

subjects whose personal information is processed. This Policy sets out GHT's operational compliance framework in terms of the **Protection of Personal Information Act, No. 4 of 2013 (POPIA)** and the **Promotion of Access to Information Act, No. 2 of 2000 (PAIA)**.

2.2 Scope of Application

This policy applies to all personal information and special personal information processed by GHT, whether stored in physical paper-based form or across digital environments (including cloud storage, backup repositories, and Disaster Recovery servers). It governs all directors, key individuals, representatives, administrative staff, contractors, and third-party Operators.

2.3 Operational Vulnerabilities & Demographics

As an authorized Financial Services Provider administering long-term insurance policies (including funeral cover), GHT processes personal data for diverse customer segments, including vulnerable demographics. GHT enforces heightened technical and operational controls to ensure ethical handling, absolute transparency, and data protection against unlawful exploitation.

2.4 Core Policy Objectives

- Establish lawful, reasonable, and clear mechanisms for processing personal information.
- Guarantee and facilitate the statutory rights of Data Subjects (access, correction, objection, and deletion).
- Define the compliance duties of GHT personnel and third-party Operators.
- Maintain rigorous technical and organizational controls to prevent unauthorized access, data compromise, or loss.

3. DEFINITIONS

- **"Act" / "POPIA"**: The Protection of Personal Information Act, No. 4 of 2013, together with all regulations and codes of conduct published thereunder.
- **"Consent"**: Any voluntary, specific, and informed expression of will by which a Data Subject agrees to the processing of their personal information.
- **"Data Subject"**: The natural or juristic person to whom personal information relates (including policyholders, beneficiaries, staff, suppliers, and business partners).
- **"Information Officer"**: The individual designated by GHT who is responsible for ensuring compliance with the Act, registered with the Information Regulator.
- **"Operator"**: Any person or entity who processes personal information on behalf of GHT in terms of a contract or mandate, without coming under the direct authority of GHT.
- **"Personal Information"**: Information relating to an identifiable, living natural person (and juristic person where applicable), including identity numbers, contact numbers, physical/email addresses, location identifiers, biometric data, financial and transactional history, and private correspondence.
- **"Special Personal Information"**: Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric data, or criminal history.
- **"Processing"**: Any automated or manual operation concerning personal information, including collection, receipt, recording, organization, collation, storage, updating, modification, retrieval, dissemination, linking, restriction, degradation, or destruction.



- **"Responsible Party":** GHT (Pty) Ltd, which determines the operational purpose and means for processing personal information.

4. EIGHT CONDITIONS FOR LAWFUL PROCESSING

GHT processes personal information in strict accordance with the eight statutory conditions outlined in Chapter 3 of the Act:

4.1 Condition 1: Accountability (Section 8)

GHT, as the Responsible Party, ensures that all measures necessary to give effect to the eight conditions are implemented at the time of determining the purpose and throughout the lifecycle of data processing.

4.2 Condition 2: Processing Limitation (Sections 9–12)

- Personal information is processed lawfully, reasonably, and without infringing data subject privacy.
- Processing is grounded on valid legal justification: **explicit consent**, **contractual necessity** (policy underwriting, issuance, premium collection, claims processing), **statutory compliance** (FAIS, FICA, Long-term Insurance Act), or **legitimate interest**.
- **Data Minimization:** Only information strictly adequate, relevant, and not excessive for policy fulfilment and administrative operations is collected.

4.3 Condition 3: Purpose Specification (Sections 13–14)

- Personal information is collected for explicit, defined, and lawful purposes directly connected to financial services delivery, underwriting administration, and staff onboarding.
- Data is retained only as long as necessary to achieve the stated purpose or comply with statutory retention mandates (e.g., the mandatory 5-year retention period under FAIS and FICA).

4.4 Condition 4: Further Processing Limitation (Section 15)

Any further processing of personal information must be compatible with the initial collection purpose. Direct marketing or third-party secondary data sharing is strictly prohibited without prior opt-in consent.

4.5 Condition 5: Information Quality (Section 16)

GHT takes reasonable, practicable steps to verify that personal data is complete, accurate, not misleading, and updated systematically during customer interactions and policy maintenance cycles.

4.6 Condition 6: Openness (Sections 17–18)

GHT maintains operational transparency by providing clear notification at the point of data capture detailing:

- GHT's identity and Information Officer contact details.
- The specific purpose of collection.

- The categories of recipients who will receive the data (e.g., underwriting partners, payment clearing houses).
- The data subject's right to access, rectify, or object to the information held.

4.7 Condition 7: Security Safeguards (Sections 19–22)

GHT establishes robust technical and physical safeguards to maintain data integrity and confidentiality:

- Role-based electronic access controls, multi-factor authentication, and SSL/TLS encryption for all web-based platforms.
- Automated **2-hour encrypted database backups** and **12-hour media/call recording synchronization** to isolated Disaster Recovery (DR) server environments.
- Physical access security at offices, clean-desk standards, and formal Operator SLA agreements requiring third-party service providers to maintain equal or greater POPIA safeguards.

4.8 Condition 8: Data Subject Participation (Sections 23–25)

Data subjects have the right to request access to, correction of, or deletion of their personal information, and to object to processing under defined statutory circumstances.

5. SPECIAL PERSONAL INFORMATION & CHILDREN'S DATA

- **Biometric Verification:** Biometric identifiers collected during onboarding or verification are processed strictly with explicit consent and stored in encrypted repositories for identity confirmation and fraud prevention.
- **Health Information:** Health details captured for underwriting claims are restricted exclusively to authorized claims handlers and underwriting partners.
- **Personal Information of Children (Section 34):** Where funeral or insurance policies nominate minor children as dependants or beneficiaries, GHT processes such data only with the explicit consent of a parent or legal guardian, or where necessary to establish, exercise, or defend a legal right or claim.

6. TRANSBORDER INFORMATION FLOWS (SECTION 72)

GHT will not transfer personal information to a foreign country unless:

- The recipient country enforces data privacy laws providing a level of protection substantially similar to POPIA; or
- The transfer is governed by a legally binding Operator Agreement containing data protection covenants matching POPIA requirements; or
- The data subject has provided explicit consent to the transborder transfer.

7. DATA SUBJECT RIGHTS AND PROCEDURES

7.1 Right of Access (Section 23 & PAIA Section 51)

Data subjects may request confirmation of whether GHT holds personal records regarding them and request a copy of the record in terms of GHT's PAIA Manual using prescribed **Form 2**. Proof of identity is mandatory prior to releasing records.

7.2 Right to Rectification or Erasure (Section 24)



Data subjects may request the correction, destruction, or deletion of inaccurate, out-of-date, incomplete, excessive, or unlawfully obtained personal records using prescribed **Form 4**.

7.3 Right to Object (Section 11(3))

Data subjects may object on reasonable grounds to the processing of their information. In line with the amended POPIA Regulations, objections can be submitted free of charge via written notice, digital channels (email/WhatsApp), or verbally to a GHT representative.

7.4 Complaints to the Information Regulator

If a data protection complaint cannot be resolved directly with GHT's Information Officer, the data subject may lodge a formal complaint with the Information Regulator:

- **Website:** <https://inforegulator.org.za/>
- **General Inquiries:** enquiries@inforegulator.org.za
- **POPIA Complaints:** POPIAComplaints@inforegulator.org.za
- **PAIA Complaints:** PAIAComplaints@inforegulator.org.za
- **Telephone:** 010 023 5200 | **Toll-Free:** 0800 017 160
- **Physical Address:** Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 / JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017

8. DATA BREACH MANAGEMENT (SECTION 22 NOTIFICATION)

Where there are reasonable grounds to believe that personal information has been accessed, compromised, or acquired by an unauthorized party:

1. **Immediate Containment:** The Information Officer and IT management isolate compromised systems, terminate unauthorized sessions, and secure backup infrastructure.
2. **Mandatory Notification to the Information Regulator:** The Information Officer formally notifies the Information Regulator **as soon as reasonably possible** via the prescribed Form SCOM1 electronic breach portal.
3. **Data Subject Notification:** Unless withheld at the written instruction of law enforcement or the Regulator, GHT notifies affected data subjects directly in writing (email, SMS, or direct post) specifying:
 - The nature and scope of the security compromise.
 - Suspected risks and possible consequences.
 - Remedial measures implemented by GHT to contain and mitigate the incident.
 - Recommended protective actions for the data subject.

9. RETENTION, DE-IDENTIFICATION & SECURE DISPOSAL

- Personal records are retained strictly for the operational or statutory period mandated by FAIS, FICA, the Companies Act, and SARS tax legislation (minimum 5 years).
- Physical records reaching the end of their retention lifecycle are shredded using cross-cut industrial destruction.
- Digital records and media logs on production and DR servers are permanently purged or irreversibly de-identified using secure cryptographic deletion protocols.

10. EMPLOYEE RESPONSIBILITIES & TRAINING

- All employees, sales agents, and administrative personnel must complete mandatory POPIA compliance training upon onboarding and participate in annual refresher programs.
- Maintaining data confidentiality is a binding condition of employment. Unauthorized disclosure, copying, or improper distribution of client records constitutes gross misconduct and grounds for disciplinary action, summary dismissal, and statutory reporting.

11. POLICY REVIEW

This Policy is reviewed annually by the Information Officer to ensure complete alignment with amendments to South African data protection legislation, Information Regulator guidance notes, and operational developments.

ADOPTION DECLARATION

I, Nicole du Plooy, in my capacity as the formally designated Information Officer and Chief Executive Officer of GHT (Pty) Ltd, hereby confirm the formal adoption, implementation, and operational enforcement of the GHT Protection of Personal Information Policy and its associated technical safeguards.

Signature:  _____

Nicole du Plooy

Information Officer & Chief Executive Officer

GHT (Pty) Ltd

Date: 21 August 2026