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## ***Sigma Risk Solutions (Pty)Ltd*** **PRIVACY MANAGEMENT POLICY**

## 1. Interpretation:

<b>“Client/s”</b>	Means a Company that contracted with Sigma including such Company’s employees which are listed on an Insurance scheme, Policyholders, claimants or beneficiaries as may be applicable.
<b>“Sigma”/“SRS”</b>	Means Sigma Risk Solutions (Pty) Ltd
<b>“Personal Information”</b>	Has the meaning ascribed to it under the Section 1 of the POPI Act
<b>“Act”</b>	Means the Protection of Personal Information Act (also POPI or POPIA) (2013)
<b>“You/your”</b>	Has the meaning ascribed to “client” under this section

## 2. Introduction:

The Protection of Personal Information Act (POPIA) requires us to inform you, our client, how we use and to whom we disclose personal information we obtain from you.

We are committed to protecting every client’s privacy and ensure that your personal information is used appropriately, transparently and according to applicable law (the right to privacy is protected by section 14 of the constitution).

Changes to this policy will be communicated to relevant management in your organization by e-mail.

## 3. What Information we collect from our client(s):

Sigma only processes information (personal or otherwise) that are specifically provided for in relevant Agreement(s) with the client. The type and frequency of information collected depends on the nature of the services selected in applicable Agreements. Information collected from client(s) may include the following (this list is not exhaustive):

- a) Copy of Identification document and/or Passport and/or Driver’s Licence
- b) Residential and Business address and contact details
- c) Bank account details
- d) Affidavit(s) where applicable
- e) Claim documents
- f) Documentation serving as “proof of residence”
- g) Additional data as may be required to assist adequately

## 4. What the information is used for:

We will only use your personal information for the purpose it was collected with consent obtained from you, our Client. You have the right of refusal at any time to withdraw your consent to the information you provided us with.

Reasons for the collection of your information may include the following:

- a) General underwriting purposes, credit reference checks, criminal checks and ongoing administration.
- b) Assessment and processing of claims.
- c) To monitor and prevent possible instances of a conflict of interest(s), fraud and money laundering.
- d) To confirm your identity.

- e) For the purposes of verifying your claims history etc.

## **5. Who has access to your information?**

- a) Relevant Sigma personnel (including our claims manager, assessor and Director)
- b) Relevant third parties charged with specific duties in the claims process (including third party recovery specialists, third party claim assessors, surveyors, repairers and insurance brokers)
- c) Any other party to whom we are legally obliged to disclose your information

## **6. The steps we take to ensure your information is protected:**

Sigma is committed to protect all client information in accordance with the Act and all relevant privacy laws. Sigma has recorded its record keeping procedures in the following Policies (which can be viewed upon request):

- Sigma Claims Filing System
- Sigma Record Management Procedure

Client records are stored in accordance with these Policies in either hard copy, soft copy or both. The hard copy files are placed in named folders and stored in cabinets once the relevant documents have been processed.

The soft copy records are stored on our computer claims system and is password protected and contain the latest firewall and anti-virus protection. In addition to existing protection on the system, personal information is also subject to an automatic redaction process for claim records which has not been changed for 5 years or more. More information on the redaction process may be requested from: [andrew.wethmar@sigmarisk.co.za](mailto:andrew.wethmar@sigmarisk.co.za)

## **7. Breach and Incident Management Protocol:**

In the unlikely event that your information is disclosed to an unauthorized third party we will:

- a) Investigate the breach.
- b) Establish the seriousness of the breach.
- c) Resolve internally where possible.
- d) Inform you.
- e) Follow the necessary steps to resolve the situation.

**Please note:** In the event that your complaint is not resolved to your satisfaction you have the right to bring the complaint to the “Information Regulator” that is mandated under the Act.

## **8. How do we dispose of your information?**

Your information is held for a period of five years, in terms of current legislation, even after termination of our business relationship. After five years, hard copy information will be shredded, and soft copy records will be redacted our computer system. The redacted information may be accessed at a later stage, but only by authorized personnel.

## **9. Your rights of access to information**

You have the right to access the information that we collect from you as well as the right to request that we delete your information. You can contact us by means of the following contact information:

- a) **Information Officer:** Brett Wethmar
- b) **Telephone No:** (011) 463 0105
- c) **Physical Address:**  
Ground Floor, Coral House  
20 Peter Place  
Lyme Park  
Sandton, 2060
- d) **Postal Address:**  
Po Box 803  
Cramerview  
2060
- e) Email Address: [brett.wethmar@sigmarisk.co.za](mailto:brett.wethmar@sigmarisk.co.za)
- f) Website Address: <http://www.sigmarisk.co.za/>

## 10. Training

Sigma's staff is made aware of, and from time to time will receive training on privacy regulations like the POPI Act, as well as related company policies like this Policy. Record is kept of all staff training programmes.

**Version History:**  
17/07/2019