

— CARLTON BROKERS —

Carlton Brokers Privacy Policy

Effective Date: 6 May 2023

This Privacy Policy outlines how Carlton Brokers ("we," "us," or "our") collects, uses, discloses, and protects the personal information of individuals ("you" or "your") who interact with our insurance brokerage services. We are committed to maintaining the privacy and security of your personal information in accordance with applicable data protection laws in South Africa. Please read this Privacy Policy carefully to understand our practices regarding your personal information.

1. Information We Collect

We may collect the following types of personal information when you engage with our brokerage services:

1.1. Personal Identification Information: This may include your name, address, telephone number, email address, date of birth, identification numbers (such as ID or passport numbers), and other similar information necessary for providing insurance services.

1.2. Financial Information: We may collect financial information, including bank account details and payment card details, to facilitate premium payments, claims processing, and other related insurance services.

1.3. Insurance Information: We may collect information related to insurance policies, claims history, coverage details, and other relevant information required to provide insurance brokerage services.

1.4. Communication Information: We may collect information from our communications with you, such as emails, phone calls, or other forms of correspondence.

1.5. Website Usage Information: We may collect information about how you use our website, including your IP address, browser type, operating system, browsing actions, and patterns. This data helps us enhance your online experience and improve our website's functionality.

2. Use of Personal Information

We use your personal information for the following purposes:

2.1. Providing Insurance Services: We use your personal information to assess your insurance needs, provide insurance quotes, manage insurance policies, process claims, and offer related insurance services.

2.2. Communication: We may use your personal information to communicate with you regarding insurance-related matters, including policy updates, claims processing, and other service-related information.

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2.3. Marketing: With your consent, we may use your personal information to inform you about our products, services, promotions, and events that we believe may be of interest to you. You have the right to opt-out of receiving marketing communications at any time.

2.4. Legal Obligations: We may process your personal information to comply with applicable laws, regulations, or legal processes, such as fraud prevention, anti-money laundering measures, or responding to requests from government authorities.

3. **Disclosure of Personal Information**

We may disclose your personal information to third parties under the following circumstances:

3.1. Insurance Providers: We may share your personal information with insurance providers to facilitate the underwriting, administration, and claims handling processes.

3.2. Service Providers: We may engage third-party service providers who assist us in operating our business and providing insurance brokerage services. These service providers are contractually obligated to protect the confidentiality and security of your personal information.

3.3. Legal Requirements: We may disclose your personal information to comply with legal obligations, respond to lawful requests, enforce our policies, or protect our rights, property, or safety, as required or permitted by applicable law.

4. **Security of Personal Information**

We take reasonable and appropriate security measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. We implement physical, technical, and organizational safeguards to maintain the confidentiality and integrity of your personal information.

5. **Your Rights**

You have certain rights regarding your personal information under applicable data protection laws. These rights may include:

5.1. Access: You have the right to request access to the personal information we hold about you.

5.2. Correction: You may request the correction of inaccurate or incomplete personal information.

5.3. Erasure: In certain circumstances.

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Purpose for Processing your Information

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Providing you with advice, products and services that suit your needs as requested.
- To verify your identity and to conduct credit reference searches.
- To issue, administer and manage your insurance policies.
- To process insurance claims and to take recovery action.
- To notify you of new products or developments that may be of interest to you.
- To confirm, verify and update your details.
- To comply with any legal and regulatory requirements.

General Notes

- Please note that we are required in terms of the General Code of Conduct for Financial Services Provider to retain records for 5 years after the termination of the transaction.
- Please note that we are required in terms of the General Code of Conduct for Financial Services Provider to retain records for 5 years after the termination of the transaction.
- We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of Personal Information is protected and maintained.