



Protection of Personal Information Policy

Issued by:
The Board of Lion Life

Owner:
The Risk and TCF Committee of Lion Life

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1. INTRODUCTION

- 1.1 As an authorised financial service provider and licensed insurer, LionLife has a legal duty to ensure that all personal information it processed, is lawfully processed in terms of the conditions for lawful processing of personal information as highlighted in POPIA.
- 1.2 Furthermore, this document sets out specific duties for LionLife in processing data subject personal information, from when it is collected or sourced until the information is of no more use and needs to be destroyed.

2. POLICY STATEMENT

- 2.1 This policy gives effect to our commitment to process information in accordance with the mandate obtained from the data subject and any obligatory nature, subject to complying with the Protection of Personal Information Act of 2013, “POPIA”. This policy is not limited to complying with provisions of POPIA, this extends to information governance in general and standards that the Board deems relevant for effective information governance.
- 2.2 We further commit to comply with POPIA, not just in letter, but in spirit as well. We understand the intent behind the introduction of the legislation and therefore we are embracing this as it is seeking to ensure privacy and structured way of information management.

3. DEFINITIONS

For purposes of this policy, the below mentioned words and/or phrases shall have the following meaning assigned to them:

- 2.1. **“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;
- 2.2. **“competent person”** means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child;

- 2.3. **“consent”** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 2.4. **“Constitution”** means the Constitution of the Republic of South Africa, 1996;
- 2.5. **“data subject”** means the person to whom personal information relates e.g. policyholders, employees, intermediaries, consultants etc;
- 2.6. **“intermediaries”** means any person rendering services as an intermediary.
- 2.7. **“LionLife”** means the insurer Lion of Africa Life Assurance Company Limited (registration no: 1942/015587/06, FSP no: 15283);
- 2.8. **“personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—
- 2.8.1. 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 the person;
 - 2.8.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.8.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.8.4. the biometric information of the person;
 - 2.8.5. the personal opinions, views or preferences of the person;
 - 2.8.6. 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;
 - 2.8.7. the views or opinions of another individual about the person; and
 - 2.8.8. 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;
- 2.9. **“POPI”** stands for Protection of Personal Information Act, 2013 (Act No. 4 of 2013);
- 2.10. **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including-
- 2.10.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.10.2. dissemination by means of transmission by means of transmission, distribution or making available in any other form; or

- 2.10.3. merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 2.11. **“Regulator”** means the Information Regulator as established by section 39 of POPI.
- 2.12. **“third parties”** intermediaries, companies in our group of companies, contractors and verification agencies.

4. PROCESSING PERSONAL INFORMATION

- 4.1 LionLife is required to process personal information to enter into contract to fulfil contractual requirements and to fulfil its regulatory obligation. The company further processes personal information to enable it to enhance the experience of data subject in relation to the business relationship. To ensure that data subject is always treated fairly and in promoting transparency, LionLife will disclose up-front the purpose of processing the personal information obtained and what it may further be used for.
- 4.2 Where information may potentially be used for other objectives than originally acquired for, LionLife will, prior to processing the personal information, obtain a consent from the data subject concerned.
- 4.3 LionLife may however process personal information in absence of a consent if processing is required to:
- 4.3.1 exercise contractual or legal obligation;
 - 4.3.2 processing is required to protect legitimate interest of the data subject;
 - 4.3.3 processing is necessary for pursuing the legitimate interest of LionLife or third-party contract to LionLife.
- 4.4 Personal information will only be collected from a consenting adult, competent person or from a third party, subject to valid consent from the data subject.

5. HOW WE WILL COLLECT PERSONAL INFORMATION

5.1 LionLife will primarily collect personal information directly from the data subject, which would typically be face-to-face, via other channels like emails, fax, telephone and business account WhatsApp.

5.2 Personal information may also be collected from third parties, however, the data subject consent will be requested prior executing on this action. LionLife will clearly advise data subject why this action may be necessary.

5.3 LionLife will never request for personal information on the social media accounts except where 6.1 above applies.

6. HOW YOUR PERSONAL INFORMATION WILL BE PROCESSED?

6.1 The following are some of the reasons for processing personal information:

- 6.1.1 Compliance with law, in letter and spirit;
- 6.1.2 To argue our cases or defend us from prosecution or legal disputes within the ambit of the law;
- 6.1.3 To fulfil contractual obligation;
- 6.1.4 To enhance the data subject's experience;
- 6.1.5 For marketing;
- 6.1.6 For research and product development or enhancement; and
- 6.1.7 Protecting data subject's legitimate interests.

7. CROSS BORDER INFORMATION

7.1 LionLife will never transfer personal information deemed confidential, unless this is public knowledge, to any entity outside the Republic of South Africa. Where an obligation arises to transfer personal information outside the republic, the data subject will be accordingly notified.

8. DISCLOSURE OF PERSONAL INFORMATION

- 8.1 LionLife may share any personal information of a data subject with a third party contracted to perform services approved by LionLife in terms of the contractual agreement. In such instances, LionLife will ensure that third parties have the relevant controls in place to comply with the conditions for lawful processing of personal information.
- 8.2 LionLife may also disclose any personal information when it has a duty or right to do so in terms of legislation or in any legal proceedings.

9. RETENTION AND DELETING OF PERSONAL INFORMATION

- 9.1 LionLife will not retain records of personal information any longer than is necessary for achieving the purpose for which the information was collected or processed, unless:
- 9.1.1 the retention of such record is required by law;
 - 9.1.2 LionLife requires such record for lawful purposes related to its function or activities;
 - 9.1.3 the retention of such record is required in terms of a contractual agreement between the parties thereto; or
 - 9.1.4 the necessary consent has been obtained from the data subject and is for a legitimate interest
- 9.2 LionLife will destroy or delete a record of personal information as soon as reasonably practicable, where it is no longer authorised to retain such record.

10. SECURITY SAFEGUARDS

- 10.1 LionLife will ensure that all the information that gets processed is adequately safeguarded to ensure that the integrity of information is maintained and that there is proper access control.
- 10.2 Where LionLife makes use of third parties to process personal information, LionLife will ensure that that the third parties have adequate control measures in place.
- 10.3 Should there be reasonable grounds to believe that the personal information has been accessed or acquired by any unauthorised person, LionLife will take immediate steps to mitigate any risk

that might be suffered by the data subject and will notify the Regulator and impacted data subject of such breach including mitigations in writing.

11. THE RIGHTS OF A DATA SUBJECT

The data subject has the right to lawful processing of their personal information in terms of the provisions of POPI, including the right to:

- 11.1 Be made aware when personal information is collected, accessed or acquired by an unauthorised person;
- 11.2 Inquire whether LionLife holds personal information of the data subject and to request access to the personal information;
- 11.3 Withdraw consent; provided that the lawfulness of the processing of personal information before such withdrawal or the processing of personal information required to exercise legitimate obligation as provided by POPI will not be affected.
- 11.4 Request, where necessary, the correction, destruction or deletion of personal information *(through sending Form 2)*;
- 11.5 Object on reasonable grounds relating to a particular situation to the processing of your personal information *(through sending Form 1)*;
- 11.6 Object to the processing of personal information at any time for purposes of direct marketing or unsolicited electronic communications *(through sending Form 1)*;
- 11.7 Not to have personal information processed for purposes of direct marketing by means of unsolicited electronic communications;
- 11.8 Not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of personal information intended to provide a profile;
- 11.9 Submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject *(through sending Form 5)*;
- 11.10 Institute a civil action for damages against LionLife, in a court with competent jurisdiction, for breach of any of the provisions of POPI.

12. LIMITATION

- 12.1 LionLife processes personal information of children to the extent allowed to fulfil its contractual obligation and where there is a legal obligation to disclose that information. LionLife does not directly engage or enter into contract with minors.
- 12.2 LionLife will not be processing the following special personal information, unless it is required to do so by law and where it is essential to enter into contract as part of risk mitigation to the business. The following is examples of special personal information:
 - 12.2.1 the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject;
 - 12.2.2 the 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.

13. REPORTING

- 13.1 For any questions or where further information may be required please contact us, details provided on Annexure A.
- 13.2 Any violations or complaints may be reported to the Information Regulator, details provided on Annexure A

FORM 1

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 2]

Note:

- 1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- 3. Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	

Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject/designated person

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

☐

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	

	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person

FORM 5

**COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 7]**

Note:

- 1. Affidavits or other documentary evidence as applicable in support of the request may be attached.*
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- 3. Complete as is applicable.*

Mark the appropriate box with an "x".

Complaint regarding:

☐

Alleged interference with the protection of personal information

☐

Determination of an adjudicator.

PART I	ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION IN TERMS OF SECTION 74(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (Act No. 4 of 2013)
A	PARTICULARS OF COMPLAINANT
Name(s) and surname / registered name of data subject:	
Unique Identifier/Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address :	

B	PARTICULARS OF RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the complaint)</i>
PART II	COMPLAINT REGARDING DETERMINATION OF ADJUDICATOR IN TERMS OF SECTION 74(2) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)
A	PARTICULARS OF COMPLAINANT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	

Fax number/ E-mail address:	
B	PARTICULARS OF ADJUDICATOR AND RESPONSIBLE PARTY
Name(s) and surname of adjudicator:	
Name(s) and surname of responsible party /registered name:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the grievance)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person

Annexure A - Incident Response Plan

1. Introduction

This incident response plan is to guide employees how to respond to an incident or suspected incident which is in the form of a breach in personal information held or hosted by LionLife, directly or indirectly. This further demonstrates to the data subject, how breaches in personal information will be treated and the issuance of any notifications where may be required.

2. Incident

An incident/breach is an event where data, especially personal information, gets accessed by an unauthorised user or where this is suspected to have been accessed by an unauthorised user. Any other security compromise to data is also considered as an incident or data breach.

3. Lodging an incident

All incident identified or suspected must be reported to the information officer immediately upon discovery or suspicion. Contact details are provided in Annexure?.

4. Management of lodged incidents.

- 4.1. All lodged incidents will be investigated to validate the allegation/suspicion. Depending on the magnitude and nature of investigation required, third parties may be onboarded as part of the investigation team.
- 4.2. As part of the investigation, LionLife may be required to further process personal information of data subjects. Irrespective of this, LionLife ensure to the protection of personal information, even where it is processed further.
- 4.3. On conclusion of the investigation, LionLife will communicate with the relevant parties depending on the nature of the outcome.

5. Communication of outcome

- 5.1. Where a threat has been identified depending on the magnitude of the threat, LionLife will timeously inform the following parties:

5.1.1. The Information Regulator on:

- 5.1.1.1. Breach, detailed description of this breach
- 5.1.1.2. Extent of the breach
- 5.1.1.3. Actions already taken to mitigate and remediate the situation
- 5.1.1.4. Actions still to be taken, and
- 5.1.1.5. The respective timelines of the above actions

5.1.2. Data subject on:

- 5.1.2.1. Breach, detailed description of this breach
- 5.1.2.2. Extent of personal information of the data subject that was breached
- 5.1.2.3. Recommended actions or non-actions to be taken by the data subject to mitigate the possible adverse effects of the security compromise,
- 5.1.2.4. Respective timelines where applicable. and
- 5.1.2.5. if known, the identity of the unauthorised person who may have accessed or acquired the personal information.
- 5.1.3. Other parties with interest to the breach will also be notified where applicable. Some examples would be SAPS, insurer, etc. This will dependent on the nature of the breach.
- 5.2. It is critical that the relevant parties be informed as soon as possible so that they can take the necessary precautions where require. Investigations in nature takes a while to conclude, as result the delay could aggravate the situation. LionLife will as soon as reasonably possible, even before the conclusion of any investigation, where it can confidently confirm the breach, immediately communicate/inform the relevant parties of the breach. This communication will be sent out within 48 hours of positively identifying the breach.
- 6. Closure
 - 6.1. LionLife will further investigate, where required, to establish the root cause of the breach or the causal event and notify the relevant authorities where applicable.
 - 6.2. Further case studies will be conducted to find a suitable mitigation as well as remediation of the risk that occurred.
 - 6.3. LionLife will communicate with affected parties to provide the outcome if not already provided.

Annexure B – Contact details

Information Officer

Paul Myeza (CEO)

Lion of Africa Life Assurance Company Limited

10th Floor

2 Long Street

Cape Town CBD

8000

Tel: 021 461 8233

Fax: 021 461 7280

POPI related enquiries: popi@lionlife.co.za

The Information Regulator (South Africa)

33 Hoofd Street

Forum III, 3rd Floor Braampark

Braamfontein, Johannesburg

Tel: 010 023 5207

Fax: Not available as yet

Complaints: complaints.IR@justice.gov.za

General enquiries: infoereg@justice.gov.za

REVIEW OF THIS POLICY

This policy will be reviewed every two (2) years or whenever regulatory changes occur.

VERSION

	Notes
Version number	2
Effective date	May 2021
Changes since previous version	Content created
Policy owner	Risk committee
Distribution to	Board of Directors
	Heads of Control Functions
	Senior Management Team
	Managers and senior officials

DOCUMENT HISTORY

Date	Document Version	Changes	Author/Reviewer
May 2021	1	Initial Drafting	Legal & Compliance
	1	Review	MANCO
	1	Approval	Board
01 October 2023	2	Review	Compliance
	2	Reviewer and approver	Risk Committee
	2	Approval	Board
November 2024	2	Review	Compliance
November 2024	2	Reviewer	Risk Committee
April 2025	2	Reviewer	Risk Committee
April 2025	2	Approval	Board