

January 2024

## TO WHOM IT MAY CONCERN

### Our Commitment

Total Risk Administrators (hereafter referred to as “TRA”) is committed to ensuring the security and protection of the personal information that we process and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the relevant data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the Protection of Personal Information Act – No 4 of 2013 (hereafter referred to as “POPIA”) and have created the appropriate framework for the implementation of such.

TRA is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose, and demonstrates an understanding and appreciation for the POPI Act. Our preparation and objectives for POPIA compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### POPIA preparation

TRA has always had a consistent level of data protection and security across our organisation. However, it is our aim to be fully compliant with the POPI Act that came into force on 1 July 2021.

TRA’s preparation and management according to POPIA framework interpretation has included:

- a) Information Audit - carrying out an audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed. This includes the correct procedural changes surrounding data storage, management and destruction of up-to-date records.
- b) A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information.
- c) Top Management buy-in – The management of TRA is fully committed to protecting data in the organisation and demonstrating that we are POPIA compliant.
- d) Policies & Procedures - revising and implementing our data protection policies and procedures to ensure we meet the requirements and standards of the POPI Act.
- e) Legal Basis for Processing - we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations are met.
- f) Privacy Notice/Policy – we have developed and adapted our Privacy Notice to comply with the POPI Act, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information. All updates will be communicated as effective changes are made.
- g) Obtaining Consent - we have revised our consent mechanisms for obtaining personal information, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have stringent processes for recording consent, making sure that we can evidence an opt-in, along with time and date records; and an accessible way to withdraw consent at any time.
- h) Data Subject Rights - In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we respect an individual’s right to access any personal information that our Organisation processes about them and to request information about:

- (i) What personal information we hold about them.
  - (ii) The purposes of the processing, i.e. for the provision of insurance related services
  - (iii) The categories of personal information concerned.
  - (iv) The recipients to whom the personal information has been/will be disclosed, i.e. medical service providers, insurers, healthcare funders, IT and assistance service providers
  - (v) How long we intend to store your personal information for.
  - (vi) If we did not collect the data directly from them, information about the source.
  - (vii) The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this.
  - (viii) The right to request erasure of personal information (where applicable) or to restrict processing in accordance with the POPI Act, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.
  - (ix) The right to lodge a complaint or seek judicial remedy and who to contact in such instances.
- i) Measures are in place ensuring that where we share personal information with third parties, i.e. medical service providers and healthcare funders, to assist us in providing insurance related services, like tariff confirmations and discount requests, on behalf of our policyholders, that they demonstrate an ongoing commitment to POPIA compliance. Where applicable, this may include performing security diligence and having appropriate contractual terms in place as well as any updates and changes to agreements that are currently in place and to be placed in the future.
  - j) Internal measures are developed together with adequate systems to identify personal information security incidents and how to handle them.
  - k) Internal awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.

#### Information Security & Technical and Organisational Measures

Our Organisation takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal information that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction. We will continue to invest in and improve our security practices.

#### Organisation Roles and Employees

TRA has designated the undermentioned as our Information Officer and Deputy Information Officers with the responsibility to maintain our POPIA compliance.

If you have any questions about our compliance with the POPI Act, please contact us by email at:

|  |   |
|--|---|
| <b>Information Officer:</b><br><b>Deputy Information Officer:</b><br><b>Deputy Information Officer:</b><br><b>Contact Number:</b><br><b>Address:</b> | <b>Rina Wheeler – Email Address: <a href="mailto:rinaw@totalrisksa.co.za">rinaw@totalrisksa.co.za</a></b><br><b>Warren Gates – Email Address: <a href="mailto:warren@totalrisksa.co.za">warren@totalrisksa.co.za</a></b><br><b>Naomi Buchner – Email Address: <a href="mailto:naomi@totalrisksa.co.za">naomi@totalrisksa.co.za</a></b><br><b>011 372 1540</b><br><b>16 Jersey Drive Longmeadow Business Estate East, Longmeadow,</b><br><b>Johannesburg, 1609</b> |
|--|---|

Yours sincerely



**Geoff Du Preez**  
**CHIEF OPERATING OFFICER**

16 Jersey Drive, Longmeadow Business Estate (East), Longmeadow, Edenvale, Johannesburg, 1609

P.O Box 8012, Greenstone, 1616

**T** 011 372 1540 | **F** 011 372 1579 | **W** [www.totalrisksa.co.za](http://www.totalrisksa.co.za)

**TOTAL RISK ADMINISTRATORS (PTY) LTD**  
 an authorised financial services provider

**Directors:** FRANK THAYER (CEO), GEOFF DU PREEZ (COO)  
 Reg. No.: 1999/024507/07 | FSP No. 40815