



Privacy Policy of Universal Risk Solutions

Introduction

This Privacy Policy outlines the practices of **Universal Risk Solutions** regarding the collection, use, protection, and disclosure of personal information gathered from our clients through various interactions and engagements. By using our services, you consent to the processing of your personal information as described in this policy.

Universal Risk Solutions respects your privacy and is committed to protecting your personal information. This policy outlines our practices regarding the collection, use, and disclosure of your information through our website and services.

Information We Collect:

Personal Information: Includes name, contact details, and any other information you provide when using our services, such as during inquiries or service engagements.

Usage Data: Information on how the services is accessed and used, which may include IP addresses, browser type, and usage times.

What is Personal Information?

Personal information refers to any information that can identify you as an individual. This includes, but is not limited to, your marital status, national origin, age, language, education, financial history, identification numbers, contact details, biometric data, and information related to your physical and mental health, beliefs, and personal preferences.

Examples of Personal Information:

- ✓ **Marital Status:** Information such as whether you are married, single, or divorced.
- ✓ **National Origin and Demographics:** Includes details like your age, language, birthplace, and education.
- ✓ **Financial Information:** Covers aspects such as your income, any third-party payments made on your behalf, and other financial records.



- ✓ **Identification Numbers:** This could be any number used to identify you, such as an employee ID, social security number, identity document number, or passport number.
- ✓ **Contact Details:** Your email address, physical addresses (residential or work), and telephone numbers.
- ✓ **Biometric Data:** Unique biological attributes like fingerprints, voice recognition data, and signatures.
- ✓ **Personal Characteristics:** Details about your race, gender, sexual orientation, ethnicity, religious beliefs, and other similar personal attributes.
- ✓ **Health and Medical Information:** Includes sensitive health data like medical conditions, disability status, and medical history, including HIV/AIDS status.
- ✓ **Legal and Employment History:** Any records pertaining to your employment, legal interactions, and criminal background.
- ✓ **Personal Beliefs and Opinions:** Encompasses your private views, opinions, or any confidential correspondence.
- ✓ **Observations by Others:** Includes information about you as expressed by others, which can impact your privacy.

Collection of Personal Information

We collect personal information through:

- ✓ Direct interactions with our payroll, HR departments, or client services.
- ✓ Third-party integrations with our software platforms.
- ✓ Your use of our products and services.
- ✓ Your engagements with us via support desks, emails, telephone calls, social media, and surveys.



What is Special Personal Information?

Definition: Special personal information is a subset of personal information that pertains to more sensitive aspects of an individual's life. This type of information requires higher levels of protection due to its potential impact on an individual's privacy and well-being.

Categories of Special Personal Information:

- **Race:** Information about your race may be processed, for example, when companies need to submit statistical reports to regulatory bodies like the Department of Labour.
- **Ethnic Origin:** Details about your ethnic background.
- **Trade Union Membership:** Information regarding your affiliation with trade unions.
- **Health:** Data about your health, which might be necessary when applying for insurance policies or during medical assessments.
- **Biometric Information:** Used for verifying identity, such as fingerprints, facial recognition data, or voice prints.
- **Criminal Behaviour:** Information about any criminal behaviour or alleged offenses, which can be relevant in security clearances or legal proceedings.

The handling of special personal information is governed strictly under privacy laws, ensuring that it is processed only under stringent conditions and with proper safeguards to protect your privacy rights.

When Will We Process Your Special Personal Information?

Circumstances for Processing Special Personal Information: At **Universal Risk Solutions**, we are committed to handling your sensitive data with the highest standards of confidentiality and compliance. We may process your special personal information under these specific circumstances:

- **With Your Consent:** If you have explicitly agreed to the processing of your special personal information.
- **HR and Payroll Needs:** If the information is necessary for human resource or payroll purposes.
- **Legal Rights and Obligations:** If processing is required to establish, exercise, or defend a legal right or obligation.



- **Statistical and Research Purposes:** If the information is used for statistical or research purposes, provided that all legal requirements for such processing are met.
- **Public Information:** If you have made the special personal information public yourself.
- **Legal Requirement:** If processing is mandated by law.
- **Identification Purposes:** If racial information needs to be processed to identify you.
- **Insurance-related Processing:** If health information is processed to assess insurance risks, comply with insurance policies, or enforce insurance rights and obligations.

We ensure that all processing of special personal information is conducted lawfully, ethically, and with your privacy rights as our priority.

When and From Where Do We Obtain Personal Information About You?

Sources of Personal Information: At Universal Risk Solutions, we gather personal information through various channels to better serve you and fulfil our business functions. Here's how and from where we may obtain your personal information:

- **Internal Sources:** We collect personal information internally from our payroll and HR departments, as well as from similar departments of our clients.
- **Direct from Clients:** Clients directly provide us with both financial and non-financial information.
- **Third-Party Integrations:** We obtain personal information from third parties that integrate directly with our software platforms.
- **Usage Data:** Information is collected based on your use of our products, services, or service interaction channels.
- **Engagements and Interactions:** We gather data when you engage with us through various mediums such as our support desk, emails, telephone calls, social media, and surveys.

Consent for Third-Party Collection: If legally required, we will seek your consent before collecting personal information from third parties.

Third-Party Information Providers: The third parties from whom we might collect your personal information include but are not limited to:



- **Business Partners:** For purposes outlined in this Privacy Policy.
- **Personal Connections:** Such as your spouse, dependents, employer, and other similar sources.
- **Authorized Representatives:** Individuals you authorize to act on your behalf, such as those making bookings or medical practitioners for insurance verification.
- **Legal and Financial Advisors:** Including attorneys, debt collectors, and others who assist with enforcing agreements.
- **Financial Service Providers:** Such as payment processors, banks, and entities involved in managing financial transactions.
- **Insurance and Financial Institutions:** For underwriting, policy provision, and claims assessment purposes.
- **Regulatory and Legal Authorities:** Including law enforcement, fraud prevention agencies, regulatory bodies, industry ombudsmen, and tax authorities.
- **Legal Representatives:** Trustees, executors, or curators appointed by courts.
- **Service Providers and Contractors:** Including couriers and subcontractors who assist in delivering our services.
- **Legal Forums:** Courts of law or tribunals.
- **Loyalty and Reward Partners:** Partners in our customer loyalty programs.
- **Joint Venture Partners:** Entities with whom we have joint venture agreements.

We ensure that the collection and processing of your personal information are carried out transparently, ethically, and in compliance with applicable laws, safeguarding your privacy and maintaining trust.

Reasons We Process Your Personal Information

At Universal Risk Solutions, we take your privacy seriously and process your personal information for specific, lawful reasons. These reasons include:

- **Service Provision:** To provide you with our products, goods, and services.
- **Marketing Activities:** To promote our products, goods, and services directly to you.



- **Customer Support:** To respond to your inquiries and address any complaints you may have.
- **Compliance and Reporting:** To adhere to legal, regulatory, and compliance obligations, including fulfilling reporting requirements and responding to information requests.
- **Research and Development:** To conduct market and behavioural research for product and service improvement, including credit and insurance risk assessments.
- **Product Enhancement:** To develop, test, and improve the products and services we offer you.
- **Statistical Analysis:** For historical, statistical, and research purposes, such as market segmentation.
- **Payment Processing:** To process payment instruments and manage transactions.
- **Document Management:** To create and distribute documents related to payments, such as payslips.
- **Delivery and Notification:** To facilitate the delivery of goods, documents, or notices to you.
- **Security and Verification:** For security purposes, identity verification, and to ensure the accuracy of the information we hold.
- **Communication:** To communicate with you and execute your instructions and requests.
- **Customer Engagement:** To conduct customer satisfaction surveys and provide promotional offerings.
- **Insurance Operations:** For insurance and assurance underwriting, administration, claim processing and assessment, and the provision of related services.
- **Loyalty Programs:** To manage and operate customer loyalty reward programs, including tracking your qualifications for participation, managing reward points, and informing you of relevant offers.
- **Value-Added Services:** To enable you to participate in and benefit from additional services we offer.
- **Risk Management:** To assess lending and insurance risks associated with our services.
- **Other Related Purposes:** For any other purposes related or ancillary to any of the above.

These processing activities allow us to efficiently manage our operations and provide high-quality service to you, ensuring that your needs are met, and your rights are protected.



How We Use Your Personal Information for Marketing

At Universal Risk Solutions, we utilize your personal information to offer you a range of products, goods, and services that may not be strictly financial or banking related. Here's how we manage marketing communications:

- **Marketing Channels:** We may contact you in person, via mail, telephone, or through digital channels such as SMS, email, and fax to present our offerings.
- **Consent Requirement:** If you are not currently one of our customers, or when otherwise required by law, we will engage in marketing through electronic communications only with your explicit consent.
- **Opt-out Option:** Regardless of your customer status, you have the right at any time to ask us to discontinue sending you marketing materials.

This approach ensures that we respect your preferences and comply with legal standards regarding marketing communications.

Sharing Your Personal Information

At Universal Risk Solutions, we handle your personal information with utmost care and share it only under specific conditions. Here's how and when your information may be shared:

- **With Your Consent:** We will share your personal information if you have explicitly agreed to it.
- **Contractual Necessities:** If sharing your information is essential to fulfil or enforce a contract we have with you, we may share necessary details.
- **Legal Obligations:** We will share information if required by law, such as for compliance with legal processes or mandatory disclosures.
- **Legitimate Interests:** We may share your information when it is necessary to protect or pursue the legitimate interests of you, our company, or a third party.

These guidelines ensure that your information is shared responsibly and in accordance with applicable laws and regulations, protecting your privacy while meeting our operational needs.



International Transfer of Your Personal Information

At Universal Risk Solutions, we take careful steps when transferring your personal information to third parties in other countries, ensuring all such transfers comply with applicable legal standards. Here are the circumstances under which we may transfer your data internationally:

- **Adequate Protections:** We will transfer personal information only to countries where there is an assurance of adequate protection, either through the country's laws or a specific agreement with the recipient.
- **Contractual Requirements:** The transfer may be necessary to fulfil a contract with you, or to carry out a contract with a third party that benefits you.
- **Consent:** We will transfer information based on your explicit consent to do so.
- **Your Interests:** In cases where obtaining your consent is not practically feasible, the transfer will occur only if it is in your interests.

Safeguards and Legal Compliance: These transfers will always occur within the robust framework of legal requirements and safeguards. Where possible, the recipient in the foreign country will commit to protecting your information to the same extent as is legally required in your country or adhere to even stricter protections if the foreign country's laws offer greater security.

Practical Example: A typical scenario involving the international transfer of your information might include transactions where you make payments for goods or services in a foreign country, necessitating the transfer of your financial details to facilitate the transaction.

This approach ensures that your personal data is handled responsibly across borders, with respect for your privacy and compliance with international data protection standards.

Your Responsibilities and Rights Regarding Personal Information

Your Responsibilities:

- **Proof of Identity:** You must provide proof of identity when exercising any of the rights outlined below.
- **Updates to Personal Information:** Please inform us promptly if there are any changes to your personal information.



Your Rights and Responsibilities:

POPIA gives you certain rights regarding your personal information, including the right to access, correct, or delete the personal data we hold about you.

You have the right to:

- ✓ Access, correct, or delete your personal information.
- ✓ Object to processing based on legitimate grounds.
- ✓ Withdraw consent for processing your personal information.
- ✓ File complaints regarding data protection violations.

You are responsible for providing proof of identity when exercising your rights and notifying us of changes to your personal information.

Your Rights in more detail:

✓ **Access:**

You have the right to access the personal information we hold about you. This includes:

- ❖ Confirming whether we hold personal information about you.
- ❖ Obtaining a copy or a description of the record containing your personal information.
- ❖ Learning the identity or categories of third parties who have accessed your personal information.
- ❖ Requests for access will be addressed within a reasonable time frame. A fee may be required for processing your request, which we will disclose to you in advance.

✓ **Correction or Deletion:**

You have the right to request that we correct or delete any personal information that is inaccurate, irrelevant, excessive, outdated, incomplete, misleading, unlawfully obtained, or no longer authorized for us to retain. All requests must be made in writing. Corrections may take



up to 15 business days to update in our systems. If specific agreements or laws require us to retain your personal information, it may not be deleted.

✓ **Objection to Processing:**

You may object to the processing of your personal information on reasonable grounds. However, we may continue processing if:

- ❖ The processing is legally permissible.
- ❖ You have consented to the processing.
- ❖ The processing is necessary to fulfil a contract with you.

- ✓ **Withdrawal of Consent:** You may withdraw your consent for processing your personal information at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. We will explain the consequences of withdrawal. If the law allows or requires, we may continue to process your information even after consent is withdrawn. Please allow up to 15 business days for this change to be reflected in our systems.

- ✓ **Complaints:** If you believe your personal information has been handled in a way that contravenes its protection, you have the right to lodge a complaint with us or any relevant Regulator. We will address complaints to the best of our ability.

Further Information:

- ✓ For detailed procedures on how to exercise these rights, please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual), available for download from our website.

These rights and responsibilities are designed to ensure that your personal information is managed transparently, responsibly, and in compliance with applicable laws.



How We Secure Your Personal Information

Our Commitment to Security: At Universal Risk Solutions, we prioritize the security of your personal information by implementing appropriate and reasonable technical and organizational measures. These measures align with industry best practices and are designed to safeguard your data effectively. Our comprehensive security strategy includes:

- **System Security:** We ensure the security of our systems by actively monitoring access and usage, implementing stringent controls to detect and mitigate potential threats.
- **Secure Storage:** All personal records are stored securely, safeguarding them against unauthorized access, theft, or loss.
- **Access Control:** We meticulously control access to our facilities, systems, and records, ensuring only authorized personnel have entry based on strict security protocols.
- **Record Destruction:** We responsibly destroy or delete personal records when they are no longer needed, using methods that prevent data recovery to ensure your information is permanently and securely erased.
- **Compliance with Standards:** We adhere to international ISO security standards, maintaining high levels of security compliance across all operations.

Your Role in Security:

You also play a crucial role in protecting your personal information. For specific tips and guidelines on how you can keep your data safe, please visit the website of the business entity with which you have a relationship or contact our support team for more personalized advice.

These proactive security measures ensure that your personal information is protected against unauthorized access, disclosure, alteration, and destruction, maintaining its confidentiality and integrity.

Further Information:

- ✓ For detailed procedures on how to exercise these rights, please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual), available for download from our website.

These rights and responsibilities are designed to ensure that your personal information is managed transparently, responsibly, and in compliance with applicable laws.



Changes to the Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in our practices or legal requirements. Any changes will be posted on our website and effective immediately upon posting.

Cookie Policy

Definition of Cookies: A cookie is a small data file that our websites or applications transfer to your computer's hard drive or your Internet browser for storage. This file contains information that personalizes and potentially enhances your experience on our websites or applications, while also helping to identify your specific device, such as a computer or smartphone.

Consent to Use Cookies: By accessing and using our websites or applications, you consent to the transmission of cookies from our platforms to your device. These cookies enable us to recognize you as a previous visitor and tailor your experience accordingly.

Purpose of Cookies: Cookies serve multiple purposes at Universal Risk Solutions:

- ✓ They help us verify your identity and maintain your session.
- ✓ They play a role in our security measures, helping to prevent fraudulent activities.
- ✓ They enable the collection of analytics data to improve our services and your user experience.

This Cookie Policy should be considered in conjunction with our broader privacy practices and terms of use. If you have questions or need further information, please contact us.

Website Privacy Policy

Definition of Processing: In this policy, "process" refers to the various ways we may handle your personal information. These activities include collecting, using, storing, disclosing, updating, destroying, or otherwise managing your personal data. We process personal information primarily to provide services, products, or to complete transactions.

Governing Law:

These terms and conditions are governed by and construed in accordance with the laws of South Africa, and you irrevocably submit to the exclusive jurisdiction of the courts in that location.



References to Our Company: Throughout this document, terms such as “we,” “us,” and “our” refer to **Universal Risk Solutions** and all its subsidiaries.

Consent and Agreement: By utilizing our services, goods, products, and channels of service, you consent to our processing of your personal information as detailed in this Privacy Policy. It's important to review this document thoroughly as it may affect your legal rights.

Third-Party Processing: If we process personal information on behalf of another entity under a contract or mandate, the privacy policy of that other party will govern such processing.

Contact Us:

For any questions or concerns about our Privacy Policy or your personal information, please contact us directly.

Terms of Use

Acceptance of Terms:

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Links:

Universal Risk Solutions has not reviewed all of the sites linked to its website and is not responsible for the contents of any such linked site.

Modifications:

Universal Risk Solutions may revise these terms of use for its website at any time without notice.

Applicability: The version of the Privacy Policy posted on our website at any given time governs our interaction with you concerning your personal information.