



SanlamAllianz General Insurance 's Privacy Notice

This Privacy Notice describes how the SanlamAllianz General Insurance Plc collects, uses, discloses, retains, and protects your personal information, in accordance with the Data Protection law and other relevant laws.

Rwanda data protection and privacy law defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person”. This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

Who we are,

In this Privacy Notice, any reference to “SanlamAllianz GI”, refers to SanlamAllianz General Insurance Plc. A general insurance company incorporated in Rwanda which is a subsidiary of Sanlam Allianz Africa.

How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws,

Directly from you when you complete a product or service application form or claim declaration, electronically, telephonically or by way of a hard copy; Indirectly from you when you interact with us electronically by way of our website or apps.

From employers, and other contracted entities in the context of medical schemes and group insurance policies and where relevant, from third-party sources such as Hospitals and Pharmacies.

Note that where we require personal information to provide you with our products and services, your failure to provide us with the necessary information, may result in the SanlamAllianz GI being unable to provide you with our products and services.

Collection of information by third parties

Owners or information system administrators of third parties that have links to the SanlamAllianz GI, may collect personal information about you when you use their services. SanlamAllianz GI does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. SanlamAllianz GI does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform, or services.

What information we collect

Information about you - for example, your name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, status of health, medical history and any existing conditions of each person insured. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties. We acknowledge that information about

your health is special personal information. Note that we will use that information strictly in accordance with applicable laws and for insurance purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).

Contact information - in some cases, for example, we may receive your email, address, phone number and postal address.

Contractual information - for example, details about the policies you hold and with whom you hold them.

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, and it will not affect the processing of your personal information where consent is not required.

How we use your information:

To provide clients with our products and services they have requested and to notify them of important changes to such products and services, we need to collect, use, and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.

To the extent permissible under applicable laws, SanlamAllianz GI may use your information:

- To conclude and administer your application, which may include underwriting.
- To execute a transaction in accordance with your request.
- To assess, check, and process claims.
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you.
- To comply with regulatory requirements, such as regulatory reporting.
- Including as part of party due diligence required under applicable laws and in terms of Sanlam Group policies.
- For debt recovery or debt tracing.
- To perform any risk analysis or for purposes of risk management to you or our business in general.
- For audit and record-keeping purposes.
- For purposes of proof and legal proceedings.
- To enhance your experience when interacting with the SanlamAllianz GI and to help us improve our offerings to you.

For any other purpose related to and compatible with the above.

Sharing your information

SanlamAllianz GI will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to the following entities:

- Other third parties in relation to the purposes set out under the previous section (How we use your information) such as CAL, BNR,¹
- Other insurers, public bodies, and law enforcement (either directly or through shared databases) for fraud detection and prevention
- Reinsurers who provide reinsurance services to SanlamAllianz GI and for each other. Reinsurers will use your personal information to decide whether to provide reinsurance cover, assess and deal with reinsurance claims, and to meet legal obligations.

SanlamAllianz GI will not sell, rent, or trade your personal information to any third party. SanlamAllianz GI may share information about you with financial advisers that are SanlamAllianz GI representatives or have intermediary agreements with SanlamAllianz GI. SanlamAllianz may also share information within the SanlamAllianz Group where it is in SanlamAllianz legitimate interest to do so.

SanlamAllianz GI will disclose information when lawfully required

to do so: To comply with any relevant legislation.

To comply with any legal process.

On occasion, SanlamAllianz GI may - for legitimate purposes - share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, SanlamAllianz GI will not disclose your personal information to third parties unless there is valid processing ground as set out in the data protection law.

Transfer across borders. Some of the persons to whom we disclose your personal information may be situated outside of the Republic of Rwanda in jurisdictions that may not have similar data protection laws to Rwanda. In this regard, we may send your personal information to service providers outside of the Rwanda for storage or processing on SanlamAllianz GI behalf. However, we will not send your information to a country that does not have data protection legislation similar to that of Rwanda, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with Rwanda data protection law.

Security and storage of information: SanlamAllianz GI intends to protect the integrity and confidentiality of your personal information and has implemented appropriate technical and organizational information security measures (including, but not limited to, using encryption) to keep your information secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Right of access to information: The Rwanda data protection law offers an individual the rights to access information held by a public or private body in certain instances. This right can also be exercised in accordance with the Sanlam AG data privacy policy.

Correction of your information: In accordance with Rwanda data protection law, you have a right to correct any of your personal information held by Sanlam AG. This right should be exercised in accordance with the procedure outlined in the law.

Updates

This privacy statement was last updated 11 October 2024. A notice will be posted on the Sanlam website home page whenever the Privacy Notice is materially changed. You can make a request or exercise your rights by contacting Data protection officer and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and internal policies.

Contact Us: If you have any questions or concerns regarding this Privacy Notice and would like further information about how we protect your information and/or when you want to contact the Data Protection Officer (DPO), please email us at Herbert.ngamiye@rw.sanlamallianz.com for clarification or Tel:0788540340.

Finally, you always have the right to lodge a complaint with the supervisory authority in charge of protecting Personal Data, the Data protection office, whose contact details are:

Postal Address: 21 KG 7 Ave, Kacyiru, Kigali-Rwanda

Email Address: complaint@dpo.gov.rw, databreach@dpo.gov.rw

Telephone number: +250 782 847 756 or 9080.

Website: <https://dpo.gov.rw>

DATA SUBJECT CONSENT FORM

I acknowledge and confirm that I have read and understood “SANLAMALLIANZ GENERAL INSURANCE PLC’s CLIENT DATA PRIVACY NOTICE”, my rights as a data subject and the company personal data protection and privacy practices published in the same notice. I am also aware that though subject to conditions I may withdraw my consent at any time by using the “DATA SUBJECT CONSENT WITHDRAWAL FORM”, and sending it to Data Protection Officer via email at Herbert.ngamiye@rw.sanlamallianz.com

I hereby consent to have SANLAMALLIANZ GENERAL INSURANCE process my personal information provided for the purposes and to the extent stated therein.

¹ CAL (collection Africa helps SanlamAllianz GI on insurance premium debt recovery),