














DISCOVERY GROUP

Privacy Statement



DISCOVERY GROUP'S PRIVACY STATEMENT DESCRIBES HOW DISCOVERY COLLECTS, USES AND SHARES YOUR PERSONAL INFORMATION

Discovery's core purpose is to make people healthier and enhance and protect their lives. Our Shared-value Insurance model, which is founded on this purpose, is built on the Vitality behaviour-change platform, which guides and incentivises people towards better health, driving and financial behaviours. Our Shared-value Insurance model delivers better health and value for clients, superior actuarial dynamics for the insurer, and a healthier society. Discovery combines insights from behavioural economics with clinical science, driving, and personal financial management information to create a loop of value that is shared between clients, the business and society. When you engage with Discovery, you are entrusting us with your personal information. We are committed to protecting your right to privacy and keeping your information safe. This Privacy Statement tells you how we collect, use and share your personal information, including personal information about your spouse, employees, dependants, beneficiaries and life assureds, where applicable.

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Discovery Limited is the licensed controlling company of the designated Discovery Insurance Group. Registration number: 1999/007789/06. Companies in the Group are licensed insurers and authorised financial services providers.



WHO WE ARE

'We', 'us', 'our' or 'Discovery' refers to Discovery Limited and its South African subsidiaries. All these entities are covered by this Privacy Statement. 'Discovery Group' refers to Discovery Limited, its South African subsidiaries and its subsidiaries and business operations established in other jurisdictions. You can find us at 1 Discovery Place, Sandton, Johannesburg.

You can find the privacy statements for the medical schemes administered by Discovery Health (Pty) Ltd on the website for the specific medical scheme. The privacy statements for retirement funds administered by the Discovery Group subsidiaries are also on the respective fund websites.

WHAT PERSONAL INFORMATION WE COLLECT AND FROM WHERE

We will collect personal information from you, when possible. If we are not able to, or we want to make sure that your information is up to date and accurate, we may collect your personal information from other sources. Some of the personal information we collect may be sensitive in nature. This is known as special personal information and includes information about your health, biometrics, race and any alleged criminal or objectionable behaviour. Below are the categories of personal and special personal information which we may collect about you, your spouse, life assureds, dependants, employees, and beneficiaries, and from which sources.

Category	Types of personal information	Source
Biographic and demographic information, which may be special personal information (including details of dependants and beneficiaries, where applicable)	Names, marital status, age and date of birth, gender or sex, relationship to dependants or beneficiaries, race	<p>From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website</p> <p>From your appointed financial adviser, the appointed financial adviser of the fund, scheme or product, or your employer where you join as part of an employer group</p>
Contact information (including details of dependants, beneficiaries, and employees, where applicable)	Physical address, postal address, telephone numbers (cell phone, home, work or preferred), email address	<p>By cross-referencing within the Discovery Group and/or with authoritative sources such as the national population register or Home Affairs National Identification System of the Department of Home Affairs</p> <p>From other companies within the Discovery Group, your retirement fund administered by Discovery's subsidiaries and your medical scheme administered by Discovery Health or its subsidiaries</p> <p>From consumer data verification bureaus, insurance bureaus, credit bureaus and</p>





Category	Types of personal information	Source
Unique identifiers (including details of dependants and beneficiaries, where applicable)	Government identifiers including national identification number, passport number, tax identification number, driver's licence number, or other related identifiers issued by a government branch or department	<p>other third parties including leads providers</p> <p>From tracing agents that we may appoint when, for example, we are unable to locate you, a beneficiary or dependant</p>
Financial information	Income, bank account information, financial history, insurance information, asset information, financial needs	<p>From you when you apply for or use one of our products, services, facilities or electronic platforms such as the Discovery applications or website</p> <p>From your appointed financial adviser or your employer where you join as part of an employer group</p> <p>From consumer data verification bureaus, credit bureaus, insurance bureaus and other third parties</p>
Credit information	Credit history, credit score and related financial or credit information, including insights and behaviour	From consumer data verification bureaus, credit bureaus, insurance bureaus and other third parties
Special personal information on criminal behaviour (including alleged criminal behaviour or objectionable conduct)	Criminal history or behaviour	<p>From regulatory authorities</p> <p>From international and local registers and industry bodies</p> <p>From industry databases operated by or for insurers as a group or banks</p> <p>From CCTV cameras when you visit our premises</p> <p>From forensic investigators appointed by us</p>
Administrative information	Policy, benefits, rewards, statuses, claims, financial information, servicing interactions	<p>From other companies within the Discovery Group, your retirement fund administered by Discovery's subsidiaries and your medical scheme administered by Discovery Health or its subsidiaries</p> <p>From industry databases operated by or for insurers as a group or banks</p> <p>From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms</p>





Category	Types of personal information	Source
		such as the Discovery applications or website
Non-life insurance information	Policy content, asset information, and previous insurance information (including insured asset information, address, previous policy and claim information)	<p>From you when you apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website</p> <p>From financial services exchanges</p> <p>From industry databases operated by or for insurers as a group or banks</p> <p>From your previous insurer</p>
Life insurance, medical insurance and special personal information relating to health information	Claims information, hospital admission information, previous policy and claim information, medical conditions, treatment plans, prescriptions and medication, medical history, family medical history and inherited characteristics, test results, underwriting information	<p>From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website</p> <p>From your health professional (including treating physician, pathology laboratory, radiology, hospital or treating facility)</p> <p>From health information exchanges</p> <p>From your medical scheme which is administered by Discovery Health or its subsidiaries</p> <p>From Discovery Vitality</p>
Physical activity information, which may include special personal information	Step count, heart rate, weight, blood pressure, activity information (type, duration, location), sleep data, mindfulness data and other details relating to physical activity and fitness	<p>From you when you or your employer apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website</p> <p>From partners, applications or devices linked to your Discovery product/s</p> <p>From Discovery Vitality</p>
Reward use and activity information	Purchasing behaviour	<p>From partners, applications or devices linked to your Discovery product/s</p> <p>From Discovery Group subsidiaries such as Discovery Vitality and Bank</p>
Tracking information	Location or geolocation. To find your location or location of insured assets, we will collect the latitude and longitude of	From partners, applications or devices linked to your Discovery product/s





Category	Types of personal information	Source
	<p>your device/s as well as information relating to you using:</p> <ul style="list-style-type: none"> • GPS • An IP address • Sensor data from your devices • Cell phone towers and Bluetooth-enabled devices near your device, such as beacons 	From your electronic device/s when you use our electronic platforms such as the Discovery applications or website
Employment information	Employment status and remuneration	From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website
Opinions	Survey responses, commentary, or feedback	From you when you take part in a survey
Complaint information	Information about complaints submitted to regulatory authorities	From you, your employer or regulatory authorities and ombudsmen
Biometric information, which is special personal information	Fingerprints, images used for facial recognition, genetic data, recordings used for voice recognition purposes	<p>From you when you apply for or use one of our products, services, facilities, or electronic platforms such as the Discovery applications or website</p> <p>From independent third parties or partners and government departments, such as the Department of Home Affairs</p> <p>From CCTV cameras when you visit our premises</p> <p>From voice recognition software which we use to identify you when you call into our call centres</p>
Other	Any other personal information referred to in benefit guides and terms and conditions of specific Discovery products	From you or other companies within the Discovery Group
Preferences and online identifiers	<p>Session cookies, which are temporary and will be erased once you have closed your browser. Session cookies help with security while you browse the website and will also help you navigate from page to page while you browse. These cookies cannot be disabled</p> <p>Persistent cookies, which are stored on your device to save information, settings, preferences, or login details relating to a website or mobile application. Your device will use these cookies when you visit that website or mobile application again. These</p>	When you access, interact with, or visit Discovery websites or applications, a small file with an identifier (cookie) is stored on your electronic device (such as a computer, smart phone, or tablet), which collects this information from you





Category	Types of personal information	Source
	<p>cookies are stored on your device until they expire or until you delete them</p> <p>Third-party cookies, which are created by third-party domains outside of Discovery. These cookies are used for personalised marketing and advertising purposes</p>	

NOTE

By using the Discovery websites, you agree that we may place cookies on your electronic devices for the purposes set out in this privacy statement. The Discovery websites give you the option to disable or delete cookies. You can manage your preference relating to a specific type of cookie at any time on our website by visiting [Cookies Settings](#) or the mobile application. Note that session cookies are necessary for the operation of Discovery websites and cannot be disabled. If you prefer not to have non-essential cookies placed on your electronic device while using the Discovery websites, you can disable them by turning them off in your browser. However, this may affect the overall experience of access, navigation and use of the Discovery websites. When you disable cookies, no information is gathered from your device.

NOTE

If you are giving us the personal information or special personal information of a person under the age of 18 (a minor), you confirm that you are their parent or legal guardian and that you give consent for us to process their personal and/or special personal information for the purposes covered in this Privacy Statement.

NOTE

When you give us information about other people, such as dependants, beneficiaries, or your employees, where applicable, you confirm that you are authorised to give us their information to process for the purposes covered in this Privacy Statement. You agree to indemnify us against any loss or damage (whether direct or indirect) that such person may suffer because of the unauthorised use of their personal information given by you to us.

- Most of the personal information collected about you is necessary for the Discovery Group to activate your products or provide services to you. If you do not give us the information we need, we may not be able to provide our products or services to you. If it is voluntary for you to give us certain information (such as race, except where required by legislation), we will tell you at the time when that information is collected, and you may decide whether to give us this information.
- We are required to collect and keep personal information in terms of applicable laws. For more information, please have a look at our [Access to Information Manuals](#).





HOW WE WILL USE YOUR PERSONAL INFORMATION

We use your personal information and special personal information to:

- Develop, monitor, and improve our systems and processes
- Communicate with you
- Share basic contact information across Discovery for data quality and to make sure your records are up to date and complete
- Administer and manage your products, benefits, and services across the Discovery Group, which includes assessing and paying claims, determining, and collecting premiums and providing any information, services or benefits that you are entitled to
- Conduct underwriting, risk, and fraud assessments before accepting your application for a product
- Make decisions about you or your application for any product or service using automated means and without human intervention in the decision-making process
- Resolve your complaints or queries
- Improve our existing products and services, and develop new products and services for the Discovery Group, through research and development
- Improve customer experience and service efficiency by conducting surveys and analysing your service interactions
- Fulfil legal or contractual obligations, including assisting with law enforcement, anti-money laundering and counter-terrorist financing initiatives or complying with information requests by regulators and meeting our regulatory reporting obligations
- Comply with codes of conduct and industry agreements
- Manage promotions and competitions
- Give you rewards in relation to products you hold
- Manage Discovery events and award continuing professional development points to attendees
- Make you aware of benefits that you are entitled to on any of your existing products
- Offer you personalised discounts on any existing or new products that you may be interested in
- Ensure you get access to health treatments and other benefits when required and as stipulated by the benefit rules of the products you have taken out and help you to navigate the healthcare system or the services of any healthcare or other providers when relevant (To ensure this, we may share your medical information with third parties, such as your treating doctor, with your consent, where required)
- Provide managed care services to you
- Support the early identification of medical conditions or other lifestyle risks and to encourage you to change your lifestyle to lessen the impact of these conditions
- Through cookies on the Discovery websites, authenticate you, provide security against the fraudulent use of login details and for the protection of the Discovery websites, personalise content and better understand how you use advertisements that are relevant to you, and perform analytics to improve your experience
- Trace or locate you, a beneficiary or dependant, if tracing becomes necessary for any reason relating to the administration and management of products or services provided by Discovery, a fund or a scheme administered by Discovery



NOTE

By accepting this Privacy Statement you provide us with your express consent that we may process (collect, store, use and share) your personal and special personal information for the following purposes:

- Depersonalising (removing the ways in which you may be identified) your personal information and special personal information and sharing this information within the Discovery Group for any of the purposes mentioned in this privacy statement, but specifically for research and analysis activities.
- Giving you and your dependants personalised advice about risks to your health, how you may become healthier (such as by seeing a health practitioner, having additional tests done or activating benefits) and the rewards and incentives which you may receive as a result. We will give you this advice based on market and behavioural research and analysis carried out using your personal information and special personal information held across the Discovery Group. We may communicate this advice to you or your dependants using the Discovery website or applications or other Discovery communication channels.
- Sharing your relevant personal and special personal information within the Discovery Group for underwriting a new product that you have applied for or for administering an existing product or benefit.
- Sharing personal information, including special personal information –
 - within the Discovery Group; and
 - with industry bodies and third parties,to prevent, detect and investigate fraud, financial crime and identity theft.
- Conducting sanction screening in respect of you, and where you are a juristic person, your shareholders and beneficial owners, where applicable, against all mandatory and non-mandatory sanctions lists as we may in our sole discretion determine and sending your personal information to local and international regulatory bodies and other entities in the Discovery Group if you are matched to one of these lists. If you are found on one of these lists, we may terminate our agreement with you with immediate effect.
- Obtaining from and sharing your personal and special personal information (whether confidential or not), including your creditworthiness or the creditworthiness of any payer on your product or on enquiry for a product with any Discovery Group subsidiary, credit bureau, credit provider's industry association or industry body for risk analysis, tracing, profiling, marketing and any related purposes. This includes information about credit history, financial history, judgments against you and your payment default history.
- Where you subscribe to or use the services on any Discovery website or application that need your real-time location, such as emergency services, finding a service provider, ordering medicine, measuring your driving to allocate rewards, or applying for a product, we may determine your real-time location when providing these services to you.





WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share your personal information with the following categories of persons:

- Contracted third parties who require the information to provide a service to you or us in relation to your products with Discovery, provided that the third party agrees to keep the information confidential
- Third parties such as academics and researchers, including those outside South Africa. We will ensure that the academics and researchers only use information that has been de-identified
- If we become involved in a proposed or actual merger, acquisition, or any form of sale of any assets, with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply
- Third parties, such as benefit partners, service providers and health professionals, who you have already consented to receiving your personal information
- Third parties, local and foreign regulatory bodies, or government institutions to whom we have a legal or contractual duty to give your personal information
For instance, we have a legal or contractual duty to give your information to other insurers and re-insurers or industry bodies such as the South African Insurance Association. Where we share information with other insurers or industry body registers, you may be identifiable
- Your financial adviser or the appointed financial adviser of the fund, scheme, or product:
 - Any information necessary to ensure the efficient administration of the fund, scheme, or product and to ensure that we comply with all relevant legislation
 - Your health information during any underwriting process
- If you have joined as a member of an employer group, your employer may be provided information that is relevant to your application and ongoing administration of the product, fund, or membership
- External health professionals for them to assess or evaluate clinical information if you have to do a clinical assessment
- The Discovery Group, for the purposes set out in this Privacy Statement
- A foreign regulator or law enforcement body, where required in terms of foreign legislation applicable to Discovery

In all other instances, we will ask for your consent to share personal information, unless we are permitted to do so in terms of applicable law.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

NOTE

By accepting this Privacy Statement, you agree that we may decide how long we need to keep your personal information for our business purposes.

You may withdraw your consent and we will destroy or delete your personal information unless the law allows or requires us to keep it. Where we cannot delete your personal information, we will take steps to make it anonymous.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We have put reasonable security measures in place based on the sensitivity of the information which we hold. We have put measures in place to protect your personal information from being disclosed without your authorisation and to prevent loss or misuse. No method of transmission over the internet, or method of electronic storage, is 100%





secure. While we strive to use commercially acceptable means to protect your personal information, you acknowledge that no protection which we provide is absolutely guaranteed.

For more information on how to protect your information and not fall victim to fraud, scams, phishing, and theft, visit our [Security and fraud page](#).

TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA

We may transfer your personal information outside South Africa to:

- Communicate using an email address which you give us that is hosted outside South Africa
- Administer certain services, for example, cloud and IT services
- Administer an international treatment or benefit or monitor an international emergency
- Administer any offshore product or service
- Share with entities within the Discovery Group, when they process your personal or special personal information as mentioned in this Privacy Statement

We will ensure that any company or person that we pass your personal information to agrees or is required by law to treat your information with the same level of protection as we are obliged to.

KEEPING YOU INFORMED

We would like to keep you updated about any offers and new products that the Discovery Group makes available from time to time. The Discovery Group and contracted third-party service providers may communicate with you about these and other products which we think are relevant and of benefit to you.

Discovery Group does not want to spam you. We want to send you marketing of products that suit your needs and you can afford. For this reason we may obtain data from third parties, such as credit bureaus, to enrich and analyse your personal information and by agreeing to this privacy statement, you tell us to do so.

You may unsubscribe from any direct marketing communications we may send you or from telephone marketing by:

- Logging into your profile on the Discovery website or applications and updating your communication preferences
- Following the unsubscribe prompts on the electronic marketing communication received

Please note that your unsubscribe request will take some time to action, and your selection will not automatically be effective during that time.

To make sure that we do not contact you with unwanted marketing communication after you have unsubscribed, we will store a minimal amount of your personal information (such as your name and contact details) on an opt-out register.

Note that this opt out does not relate to communication about changes on your policy, including your contributions or changes and improvements to the benefits you are entitled to on your policy.

YOU HAVE RIGHTS

You have the right to:





- Ask what personal information we have about you, by completing our [Access Request Form](#).
- Ask what personal information was sent to our suppliers, service providers or any other third party, by completing our [Access Request Form](#).
- Ask us to update, correct or delete any out-of-date or incorrect personal information we have about you, by completing our [Request for Deletion or Correction of Information Form](#). To correct your personal information, you may access your profile on the Discovery website or application, alternatively you may contact your broker or adviser for help.
- Query and make representations where we make a decision about you using automated means.
- Object to the processing of your personal information, by completing our [Objection to Processing of Personal Information Form](#).

NOTE

You may withdraw your consent for the processing activities mentioned in this Privacy Statement by contacting privacy@discovery.co.za. However, be advised that the withdrawal of your consent may result in us being unable to provide you with certain services and product offerings.

It can take us up to 30 days to respond to your request because there are procedures that we need to follow. In certain cases, we may ask for proof of your identity and at times we may have additional requirements to process your request.

CHANGES TO THIS PRIVACY STATEMENT

We may change this Privacy Statement at any time. The most updated version will be available on [our website](#). **It is your responsibility to check our website regularly to ensure that you are aware of these changes. By continuing to be a member or policyholder, you agree that the latest version will apply to you.**

WHAT TO DO IF YOU HAVE A CONCERN

01 | Follow our internal complaints process

If you believe that we have used your personal information contrary to this Privacy Statement, you have the right to lodge a complaint with the Information Regulator. However, we encourage you to first follow our internal complaints process to resolve the complaint or contact our Information Officer at privacy@discovery.co.za. If you still feel that we have not resolved your complaint adequately, contact the Information Regulator (South Africa).

For answers to any Frequently Asked Questions regarding this Privacy Statement please visit the Discovery Group privacy page at <https://www.discovery.co.za/corporate/privacy/>

02 | Contact the Information Regulator of South Africa

Discovery is regulated by the Information Regulator. Contact details: Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg | Postal address: PO Box 31533, Braamfontein, Johannesburg 2001 | POPIAComplaints@infoeregulator.org.za or PAIAComplaints@infoeregulator.org.za or <https://infoeregulator.org.za/>

