

BLUESTAR RISK CONSULTANTS - POPIA POLICY

Bluestar Risk Consultants our services, including (without limitation) our website and other interactive properties through which the services are delivered (collectively, the “Service”) are owned, operated, and distributed by Bluestar Risk Consultants (referred to in this Privacy Policy as “BLUESTAR RISK CONSULTANTS” or “we” and through similar words such as “us,” “our,” etc.). This Privacy Policy outlines the personal information that Bluestar Risk Consultants may collect, how Bluestar Risk Consultants uses and safeguards that information, and with whom we may share it.

Bluestar Risk Consultants encourages our customers, visitors, business associates, and other interested parties to read this Privacy Policy, which applies to all users. By using our Service or submitting personal information to Bluestar Risk Consultants by any other means, you acknowledge that you understand and agree to be bound by this Privacy Policy, and agree that Bluestar Risk Consultants may collect, process, transfer, use, and disclose your personal information as described in this Policy. Further, by accessing any part of the Service, you are agreeing to THE TERMS AND CONDITIONS OF OUR TERMS OF SERVICE (the “Terms of Service”). IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS OF SERVICE, PLEASE DO NOT USE ANY OF THE SERVICES.

The purpose of this notice

This privacy policy is meant to help you understand the type of personal information Infinite Risk collects and how we collect, use, share and protect your personal information. Bluestar Risk Consultants subscribes to the conditions of the Protection of Personal Information Act 4 of 2013 (POPIA) as well as the principles set out in Section 51 of the Electronic Communications and Transactions Act 25 of 2002 to make sure that you are always protected when supplying us with personal information.

What is personal information?

POPIA describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

Examples of personal information include but are not limited to, contact information, financial information, information relating to race, gender, sexual orientation, age, contact details, identity number, religion, name, culture, language and nationality.

The person to whom personal information relates is referred to as the “data subject”.

What personal information do we collect about you?

Personal information (also commonly known as personally identifiable information (PII) or personal data) is information that can be used to identify you, or any other individual to whom the information may relate.

Use of personal information.

After obtaining consent, the personal information collected or held by Infinite Risk may be used, stored, transferred, or disclosed or shared only for the purposes for which it was collected or agreed with you. This may include:

- For underwriting purposes.
- To assess and process claims;
- Providing on-going administration services for the duration of the contract;
- Fulfilling a transaction on request of a data subject;
- To respond to your inquiries and/or complaints;
- For Insurers to confirm and verify your identity or to verify that you are an authorised person for security purposes;
- For Insurers to perform detection and prevention of fraud, crime, money laundering or other malpractice.
- For any other purpose associated with your policy/contract or applicable legislation
- to send to you Bluestar Risk Consultants solicitations, product announcements like Value-Add Products, and the like that we feel may be of interest to you. Please note that you may “opt out” of receiving these marketing materials.

Records of personal information will be retained for the period necessary for achieving the purpose for which the information was collected and as prescribed by applicable legislation. Please note that you have a right to object to the processing of your personal information for example for purposes of direct marketing, unless consent was obtained from you.

What are the sources of personal information collected by Bluestar Risk Consultants (Pty) Ltd?

When providing personal information to Bluestar Risk Consultants as described in this Policy, that personal information is collected directly from you, and you will know the precise personal information being collected by us. Bluestar Risk Consultants does not collect personal information from any other sources, except where it may automatically be collected as described in the section titled “Cookies, Device Data, and How it is Used if the information in that section is considered personal information.

NOTE:

Bluestar Risk Consultants will not or does not sell, re-sell, or distribute for re-sale your personal information.

Methods of processing:

Data processing is carried out using computers and/or IT-enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In some cases, the data may be accessible to certain types of persons in charge, involved with the operations inside Infinite Risk (underwriting, compliance, marketing, system administration, etc.) or external parties (such as third- party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as data processors by Bluestar Risk Consultants.

How do we share your Personal Information with third parties?

If you agree to this in writing, we may provide any of the described categories of personal information to Bluestar Risk Consultants employees, consultants, affiliates like Insurance Companies other businesses related to insurance for the purpose of processing such information on our behalf in order to provide the Insurance Broking Service to you. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Policy.

We will not share your personal information with other, third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature which you will specifically be able to **opt-out of**.

In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) to enforce any provision of the Terms of Service , protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare; (iii) when disclosure is required to maintain the security and integrity of the Service, or to protect any user's security or the security of other persons, consistent with applicable laws (iv) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (v) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

Securing personal information

Infinite Risk processes the data of data subjects in a proper manner and shall take all reasonable technical and organisational security measures to prevent loss of, damage of personal information, unauthorised access, disclosure, modification, or unauthorised destruction of the data. However, the security of information transmitted through the internet or via a mobile device

can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.

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Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password-protected or secure areas of the Service.

The company will store all the personal information in secured environments, for example on secured Cloud space and External Data Solutions Service Provider's servers in a protected data centre.

Right to access and rectify personal information collected.

You have the right to request to review your personal information contained by Infinite Risk at any time to correct or update the information. If the purpose for which your personal information was requested initially does not exist anymore, for example you no longer have an active contract, you may request information held by the company to be removed. However, Infinite Risk can decline your request to delete the information from its records if other legislation requires the continued retention thereof or if it has been de-identified.

If you would like to obtain a copy of your personal information held by Infinite Risk, please review our information manual located at www.bluestarrisk.co.za

Direct Marketing Communications

We may communicate with you using email, SMS, and other channels (sometimes through automated means) as part of our effort to market our products or services, administer or improve our products or services, or for other reasons stated in this Privacy Policy. You have an opportunity to withdraw consent to receive such direct marketing communications, as permitted by law.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt out by submitting a request through in any email communication you may have received.

Further, you may express your communication preferences by:

- Noting your preferences at the time you register your account with the Site [or our mobile application];
- Logging into your account settings and updating your preferences; Contacting us using the contact information provided below

Please note that you may continue to receive non-marketing communications as may be required to maintain your relationship with Bluestar Risk Consultants (Pty) Ltd.

In addition to the communication described here, you may receive third-party marketing communications from providers we have engaged to market or promote our products and services. These third-party providers may be using communications lists they have acquired on their own, and you may have opted-in to those lists through other channels. If you no longer wish

to receive emails, SMSs, or other communications from such third parties, you may need to contact that third party directly.

Retention of Data

Bluestar Risk Consultants will retain your personal information only for as long as is necessary for the purposes set out in this Policy. We will retain and use personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Bluestar Risk Consultants will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Sites and/or Portals, or we are legally obligated to retain this data for longer periods.

Cookies, Device Data, and how they are used.

When you use our Service, we may record unique identifiers associated with your device (such as the device ID and IP address), your activity within the Service, and your network location. Bluestar Risk Consultants uses aggregated information (such as anonymous user usage information, cookies, IP addresses, browser type, clickstream information, etc.) to improve the quality and design of the Service and to create new features, promotions, functionality, and services by storing, tracking, and analyzing user preferences and trends. Specifically, we may automatically collect the following information about your use of Service through cookies, web beacons, and other technologies:

- domain name
- browser type and operating system
- web pages you view
- links you click
- IP address
- the length of time you visit the Sites, Portals, and/or Services
- the referring URL or the webpage that led you to the Sites

We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party service providers may do so on behalf of us).

In addition, we may use "cookies," clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Service, and the portion of the Service you choose to use. A cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site. Your browser has options to accept, reject or provide you with Policy when a cookie is sent. Our cookies can only be read by Bluestar Risk Consultants; they do not execute any code or virus; and **they do**

not contain any personal information. Cookies allow Bluestar Risk Consultants to serve you better and more efficiently, and to personalize your experience with the Service. We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Service, and to deliver content (which may include third party advertisements) specific to your interests.

We may use third party service providers to help us analyse certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyse visitor activity on the Service. We may permit these service providers to use cookies and other technologies to perform these services for Bluestar Risk Consultants. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Policy.

South African Privacy Rights

If you are a South African resident, South Africa law may provide you with certain rights with regard to your personal information under the Protection of Personal Information Act ("POPIA") and Promotion of Access to Information Act ("PAIA").as well the Consumer Protection Act Throughout this Privacy Policy you will find information required by POPIA regarding the categories of personal information collected from you; the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of the Policy and is applicable in the 12 months preceding the effective date of the Policy.

As a South African resident, the POPIA and PAIA provide you the ability to make inquiries regarding to your personal information. Specifically, the degree to which the information is not already provided in this Privacy Policy, you have the right to request disclosure or action your personal information, including:

- If your personal information is collected by us.
- The specific pieces of personal information collected about you.
- The ability to correct or delete certain personal information collected about you.
- The ability to delete all the personal information collected about you, subject to certain exceptions.
- To opt-in or opt-out of direct marketing to you.
- To object to processing of your personal information, or
- Appeal any rejection of access to your personal information.

You may submit a request regarding your rights under POPIA by submitting a request through by contacting us at one of the following: [our email address: info@infinitrisk.co.za

If we receive a POPIA request from you, we will first decide regarding the applicability of the law, and we will then take steps to verify your identity prior to responding. The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information submitted in the request with information already held by Bluestar Risk Consultants and/or contacting you through previously used channels to confirm

that you submitted the request (i.e. confirming identity through contact information that we have on file, and/or the contact information submitted to make the request).

The Bluestar Risk Consultants does not knowingly collect or process the special personal information such as your religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, health or sex life, or your criminal behaviour or biometric information.

External Links

The Service may contain links to other websites maintained by third parties. Please be aware that we exercise no control over linked sites and Bluestar Risk Consultants is not responsible for the privacy practices or the content of such sites. Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.

You hereby acknowledge and agree that Bluestar Risk Consultants is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party sites, and you hereby release Bluestar Risk Consultants from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

Children's Privacy

The Service is not intended for children under the age of 18, and Bluestar Risk Consultants does not knowingly collect the personal information of children under the age of 18.

Employee Training on Cyber Security and Data Privacy

Employee Training on Cyber Security and Data Privacy forms part of ongoing compliance training. Cyber Security training is currently further required as a basic compliance training that all employees must complete. As part of the POPIA management programme, there is a specific focus on training, awareness as well as communication that will cover data privacy, data security and more detailed cyber security training as mandatory compliance training to all staff.

Changes to this Privacy Policy

Bluestar Risk Consultants reserves the right to modify this Privacy Policy from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Privacy Policy, Bluestar Risk Consultants will post the revised Policy on our website. This Privacy Policy was last modified as of 01 November 2024.

Contact Us

If you have any questions or comments about this Privacy Policy or the Service provided by Bluestar Risk Consultants, please contact us at:

Company Email Address: info@bluestarrisk.co.za / pamelat@bluestarrisk.co.za

Company Postal Address: P O Box 2736
Northriding
2162

Contact Number: 084 580 7797

Upon receiving your request, we will contact you directly, investigate your request, and work to address your concerns. We will respond to your request without undue delay. We reserve the right to take reasonable steps to verify your identity prior to granting access or processing changes or corrections.

INFORMATION REGULATOR

If you are not satisfied with the manner in which Infinite Risk has handled and/or resolved your query, complaint or concern, you have the right to complain to the Information Regulator, whose contact details are:

Tel: 012 406 4818

Fax: 086 500 3351

Email: infoereg@justice.gov.za

Link: <https://www.justice.gov.za/infoereg/contact.html>

