# PRIVACY POLICY FOR LIFEASSIST WELLBEING SOLUTIONS (PTY) LTD

# **CLIENT PRIVACY NOTICE**

This notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act No. 4 of 2013 ("POPIA").

At LifeAssist Wellbeing Solutions (Pty) Ltd. (including this website), we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

#### 1. The Company

LifeAssist Wellbeing Solutions (Pty) Ltd, a registered company in terms of the laws of the republic of South Africa, with registration number 2010 / 002238 / 07, provides wellbeing solutions in Africa focused on developing healthy people, teams, leaders, organisations. This includes but is not limited to Employee Assistance Programme (EAP) and Employee Wellbeing Programme (EWP) services.

## 2. Definition of personal information

According to the Act "**personal information**" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, LifeAssist Wellbeing Solutions (Pty) Ltd. also includes the following items as personal information:

- All addresses including residential, postal and email addresses.
- Change of name for which we require copies of the marriage certificate or official change of name document issued by the state department.

#### 3. How Life Assist uses your information

LifeAssist Wellbeing Solutions (Pty) Ltd. uses your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for further sessions if there is a need and or legal purposes. Further processing will require your consent before the information can be used.

### For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

#### 4. The information Life Assist collect

LifeAssist Wellbeing Solutions (Pty) Ltd. collects and process your personal information mainly to contact you for the purposes of understanding your needs, requirements and delivering services accordingly. For this purpose, we will collect contact details including your name and surname, identity number, telephone numbers, address, email, race, gender, and organisation.

LifeAssist Wellbeing Solutions (Pty) Ltd. collects information directly from you where you provide them with your personal details and or from your employer if it is a managerial referral. Your consent will be necessary and required at all times. Where possible, we will inform you what information you are required to provide to us and what information is optional. LifeAssist Wellbeing Solutions (Pty) Ltd. will further interact with you about your written consent before any engagement/ services can be provided.

### 5. Disclosure of information

LifeAssist Wellbeing Solutions (Pty) Ltd. may disclose your personal information to our service providers who are involved in the delivery of services to you (i.e., affiliates). We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe is necessary to pursue your legitimate rights and interests or the interest of a third party to which the information is supplied.

### 6. Information Security

LifeAssist Wellbeing Solutions (Pty) Ltd. is legally bound to provide appropriate protection for the personal information they hold and to cease any unauthorized access and use of personal information. We will continuously attend to review our security control measures and related processes to ensure that your personal information remains secure.

Security policies and procedures entails:

- Computer and network security;
- Physical security;
- · Retention and disposal of information;
- Acceptable usage of personal information;
- · Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security breach.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.