

PRIVACY POLICY

Insight Solutions Group and its subsidiaries ("The Group")

Version 2.0 • Effective date: 30 June 2026 • Prepared in line with the Protection of Personal Information Act 4 of 2013 (POPIA)

1. Introduction

Insight Solutions Group is committed to protecting your privacy and to processing your personal information lawfully, fairly and transparently. This Privacy Policy explains how the Group obtains, uses, shares, stores and protects personal information, and the rights you have in respect of your personal information, in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and other applicable laws.

This policy applies to all of the following companies, which share common ownership and a single website and are referred to collectively as "The Group", "we", "us" or "our":

Entity	Registration number
Insight Solutions Group (Pty) Ltd	2017/169658/07
Insight Actuarial Solutions (Pty) Ltd	2002/016023/07
Insight Advisory Solutions (Pty) Ltd	2019/205265/07
Insight Data Solutions (Pty) Ltd	2023/266434/07
Insight Health Solutions (Pty) Ltd	2023/266268/07
Insight Life Solutions (Pty) Ltd	1999/021278/07
Leaf Strategic Projects (Pty) Ltd	2018/001955/07
Health Data Metrics (Pty) Ltd	2002/018543/07

Registered address: 2nd Floor, Gateway West Offices, 22 Magwa Crescent, Waterfall City, Midrand, 2066. Each entity is a separate responsible party under POPIA in respect of the personal information it determines the purpose and means of processing; this policy applies across the Group for ease of reference.

2. Scope of this policy

This policy covers the personal information of all data subjects whose information we process, including clients and their representatives, prospective clients, website visitors, suppliers and service providers, business contacts, job applicants, directors, and visitors to our premises.

This policy also applies to our employees. The specific purposes for which we process employee personal information, and the related employee consents, are set out in employees' employment agreements; we also rely on the performance of the employment contract, compliance with our legal obligations, and our legitimate interests as lawful bases. This policy gives employees the information required under section 18 of POPIA — including the categories of information we process, their rights as data subjects, our security and retention measures, and how to contact our Information Officer — and should be read together with their employment agreements. Where an employee provides us with the personal information of third parties (such as dependants, beneficiaries, next of kin or emergency contacts), the employee confirms that they are authorised to do so and have informed those persons of this policy.

This policy should be read together with the Group's PAIA Manual (which describes the records we hold and how to request access) and our website Cookie Policy.

3. Key terms

Personal information: information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person — for example name, contact details, identity number, financial information, and online identifiers.

Special personal information: information concerning a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour. Health information is treated as special personal information.

Processing: any activity involving personal information, including collecting, receiving, recording, organising, storing, updating, using, disseminating, or destroying it.

Responsible party / Operator: a responsible party determines why and how personal information is processed; an operator processes personal information on behalf of, and on the instruction of, a responsible party. Depending on the engagement, a Group entity may act as either.

Data subject, Information Regulator, and other terms have the meanings given to them in POPIA.

4. How we protect your information: the eight conditions

We process personal information in accordance with the eight conditions for the lawful processing of personal information set out in POPIA:

- **Accountability** — we take responsibility for complying with POPIA and have appointed an Information Officer.
- **Processing limitation** — we process personal information lawfully, minimally, and with your consent or another lawful basis.
- **Purpose specification** — we collect personal information for specific, explicitly defined and lawful purposes.
- **Further processing limitation** — we use personal information only in ways compatible with the purpose for which it was collected.
- **Information quality** — we take reasonable steps to keep personal information accurate, complete and up to date.
- **Openness** — we are transparent about our processing, as set out in this policy and our PAIA Manual.
- **Security safeguards** — we apply appropriate technical and organisational measures to protect personal information.
- **Data subject participation** — we respect your rights to access and correct your personal information.

5. Categories of data subjects and personal information we process

Depending on your relationship with us, we may process the following categories of personal information:

Category of data subject	Personal information that may be processed
Clients and their representatives	Names, contact details, identity/registration numbers, financial and banking details, contractual records, and information relevant to the services we provide.
Service providers / suppliers	Business details (name, registration number, VAT number, address), representative contact details, banking information, contractual and trade information.
Job applicants	Names, contact details, curriculum vitae, qualifications, employment history and references.
Employees (overview)	Personal and contact details, employment records, qualifications, payroll and tax information, and information required for labour-law compliance. The specific employee processing purposes and consents are set out in employees' employment agreements, while this policy covers employees' POPIA rights, the security and retention of their information, and how to contact the Information Officer.

Directors	Names, identity numbers, contact details, shareholding details and records required under the Companies Act.
Website users / visitors	Contact details submitted online, IP addresses, browsing activity and cookies where applicable.
Visitors to our premises	Names, contact details and CCTV/video footage (likeness).
Data subjects in client / scheme data	As part of our actuarial, health, insurance and analytics work we process data about members, policyholders and beneficiaries — including health information — on behalf of, or in collaboration with, clients (see Section 7).

6. How we collect personal information

- Directly from you — when you contact us, contract with us, use our website, apply for a role, or visit our premises.
- From our clients and third parties — for example medical schemes, administrators, insurers, employers and other stakeholders who provide data for the services we deliver.
- Automatically — through cookies and similar technologies when you use our website (see Section 9).
- From public and third-party sources — such as regulators, credit bureaus, and verification agencies, where lawful and relevant.

7. Purposes and lawful basis for processing

We process personal information for the following purposes, relying on one or more lawful bases under section 11 of POPIA (your consent; performance of a contract; compliance with a legal obligation; protection of a legitimate interest of you, us or a third party; or the proper performance of a public-law duty):

- Providing actuarial, healthcare, insurance, life, advisory, data analytics, modelling and related professional services to our clients.
- Entering into and managing agreements with clients, schemes, insurers, employers, suppliers and other stakeholders, and processing payments.
- Recruitment, onboarding and employment administration.
- Legal, regulatory, professional and governance compliance, including record-keeping, audits, regulatory reporting and the exercise or defence of legal rights.
- Security, fraud prevention, risk management and protection of our people, assets, systems and information.

- Administering, maintaining and securing our IT systems, analytical platforms and website.

Special personal information and health information

In the course of our actuarial, healthcare, insurance and advisory work we process special personal information, including health information (for example medical scheme member data, claims and healthcare-utilisation data, occupational-health and disability information). Section 26 of POPIA generally prohibits processing special personal information unless an authorisation applies.

We process such information only where an authorisation in section 27 of POPIA applies — for example with your consent, where necessary to establish, exercise or defend a right or obligation in law, where you have deliberately made the information public, or for historical, statistical or research purposes subject to appropriate safeguards.

In particular, where health information is processed for or on behalf of insurers, medical schemes, medical scheme administrators, managed healthcare organisations, administrative bodies, pension funds and employers, we rely on the specific authorisations in sections 32(1)(b) and 32(1)(f) of POPIA, as interpreted by the Regulations Relating to the Processing of Data Subjects' Health Information by Certain Responsible Parties, 2026 (Government Notice 7198, Government Gazette 54268, 6 March 2026). All processing of health information is undertaken subject to a duty of confidentiality as contemplated in section 32(2) of POPIA. Where we process health information as an operator, we do so only under a written operator agreement and on the documented instructions of the responsible party.

Where we process the personal information of children, we do so only where a competent person (such as a parent or guardian) has consented or another authorisation under section 35 of POPIA applies.

8. Cookies and website analytics

Our website uses cookies and similar technologies to enable core functionality, remember your preferences, and collect standard internet usage information to help us improve the site. You can control or disable cookies through your browser settings, although some features may not function properly as a result. Please see our Cookie Policy for more detail.

9. When and with whom we share personal information

We share personal information only where necessary and lawful, with recipients such as:

Category of information	Recipients or categories of recipients
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Identity, names and contact details	Government departments, courts, tribunals, regulatory authorities, law-enforcement agencies and auditors, where legally required.
Qualifications and professional history	Verification agencies, SAQA, professional bodies and recruitment service providers.
Financial, banking and payment information	Credit bureaus, financial institutions, payment service providers, insurers, auditors, regulators and debt-collection agencies (where applicable).
Health, disability and occupational-health information	Medical schemes, healthcare practitioners, occupational-health and wellness providers, insurers, and authorities where required by law.
Tax and payroll records	SARS, pension/provident fund administrators and benefit providers.
Contractual and business information	Insurers, legal advisers, auditors, consultants and engaged service providers.
Digital and IT records	Cloud service providers, IT support vendors and data-security providers, subject to data-protection safeguards.

Where we appoint operators (processors) to process personal information on our behalf, we require them to do so only on our instruction and to maintain appropriate security and confidentiality safeguards under a written agreement.

10. Cross-border transfers

We will transfer personal information outside the Republic of South Africa only where permitted by section 72 of POPIA — for example where the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate, substantially similar level of protection; where you consent; where the transfer is necessary for the performance of a contract with you or in your interest; or where the transfer is otherwise lawful. This includes any use of offshore cloud, administration or technology providers.

11. How we keep personal information secure

We have implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information and to prevent its loss, damage, unauthorised destruction, and unlawful access or processing, in line with section 19 of POPIA and generally accepted information-security practices. These measures, set out in our internal policies, include:

- Information classification and handling, with health and other special personal information treated as the most sensitive;
- Access control on a need-to-know basis, with user authentication and management of privileged access;
- Encryption of personal information in transit and at rest, and secure configuration of networks, servers and endpoint devices;
- Anti-malware, intrusion-prevention and cloud-security controls;
- Logging and monitoring to detect and respond to unauthorised activity;
- A formal information-security incident and breach-management process, including notification of affected data subjects and the Information Regulator where required;
- Data-retention and secure disposal/destruction of records (physical and electronic), including health records;
- Physical and environmental security at our premises;
- Written operator agreements imposing comparable safeguards on third parties.

If a security compromise affecting your personal information occurs, we will notify you and the Information Regulator as required by section 22 of POPIA.

12. How long we keep personal information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or for longer where required or permitted by law (for example tax, company-law, labour and sector-specific record-keeping obligations) or where we need it to exercise or defend legal rights. When personal information no longer needs to be retained, it is securely deleted, destroyed or de-identified in line with our data retention and disposal policy.

13. Your rights

Subject to POPIA, you have the right to:

- be notified that we are collecting your personal information, and where it is collected from another source;
- request access to the personal information we hold about you (through the access-request process in our PAIA Manual);
- request that we correct, update, or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;

- object, on reasonable grounds, to the processing of your personal information (section 11(3));
- withdraw consent where our processing is based on consent (this does not affect processing already carried out);
- object to processing for purposes of direct marketing, including by unsolicited electronic communication (section 69); and
- lodge a complaint with the Information Regulator.

We may need to verify your identity (for example with a copy of your ID) before acting on a request. Access requests may be subject to the fees set out in our PAIA Manual.

Direct marketing

We will only send you direct marketing where the law allows — either with your consent or, in the case of existing customers, in relation to similar products and services — and every marketing communication will give you the opportunity to opt out.

14. Automated decision making

Section 71 of POPIA prohibits the automatic processing of personal information, especially if the processing will substantially affect you as the data subject. We therefore strive to ensure that all processing activities have human interventions.

15. How to contact us and exercise your rights

To exercise any of your rights, ask a question about this policy, or withdraw consent, please contact our Information Officer:

Information Officer	Barry Allan Childs
Email	informationofficer@insight.co.za info@insight.co.za
Telephone	011 541 0900
Postal address	PostNet Suite #026, Private Bag X159, Halfway House, Midrand, 1685
Physical address	2nd Floor, Gateway West Offices, 22 Magwa Crescent, Waterfall City, Midrand, 2066

16. Complaints to the Information Regulator

If you are not satisfied with how we have processed your personal information or handled your request, you may lodge a complaint with the Information Regulator:

**Information Regulator
(South Africa)**

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 Toll-free: 0800 017 160
General email	enquiries@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
Website	https://infoeregulator.org.za

17. Access to records (PAIA)

Our PAIA Manual, prepared under section 51 of the Promotion of Access to Information Act 2 of 2000, describes the records we hold and how to request access to them. It is available on our website and on request from the Information Officer.

18. Changes to this policy

We review this policy regularly and may update it from time to time to reflect changes in our processing or in the law. The current version will always be available on our website at <https://www.insight.co.za>. Material changes will be highlighted where appropriate. This policy was last updated in September 2020.