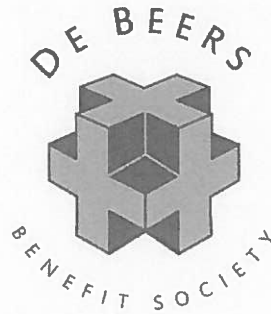


POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018



Contents

1. PURPOSE	2
2. OBJECTIVE	2
3. SCOPE	2
4. RESPONSIBILITY	2
4.1 Responsibility for Review	2
4.2 Responsibility for Implementation.....	2
5. CHANGES TO PRIVACY POLICY	2
6. PERSONAL INFORMATION	3
6.1 Sensitive personal information.....	3
7. ACCEPTANCE	4
8. DEEMED ACCEPTANCE	4
9. BENEFICIARY OBLIGATION	4
10. COLLECTION OF PERSONAL INFORMATION ON REGISTRATION AS A BENEFICIARY	4
11. PURPOSE FOR COLLECTION	5
12. USE	5
13. DISCLOSURE	5
13.1 Sharing.....	5
13.2 Legal Disclosures	6
13.3 Sale of personal information.....	6
13.4 DBBS Employees	6
13.5 Change of ownership	6
13.6 Security	7
14. ACCURATE AND UP-TO-DATE INFORMATION	7
15. RETENTION	7
16. TRANSFER TO ANOTHER COUNTRY	7
17. LIMITATIONS	8
18. ENQUIRIES	8
19. AUTHORISATION AND APPROVAL	8
20. REVISION HISTORY	9

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

1. PURPOSE

The introduction of the Protection of Personal Information Act (Act No 4 of 2013) (POPIA) in South Africa, requires that organisations who process personal information, put in place reasonable measures to protect such information. The DBBS has accordingly developed a Privacy Policy which covers how the DBBS collects, uses, discloses, transfers, and stores members' personal information.

2. OBJECTIVE

This Policy sets out the DBBS's policy with regard to the protection of personal information for the following people (or data subjects in terms of POPIA):

- members and their dependants ('Beneficiaries');

Beneficiaries have a responsibility to familiarise themselves with the DBBS Privacy Policy.

3. SCOPE

This Policy applies to the personal information of all DBBS Beneficiaries,

4. RESPONSIBILITY

4.1 Responsibility for Review

The DBBS's **Information Officer** is responsible for reviewing this Policy annually.

4.2 Responsibility for Implementation

This Policy has been authorised by the DBBS's Board of Trustees (BoT) and it is the responsibility of Society Management to implement this Policy and ensure that it is applied in a consistent manner. The BoT is also responsible for endeavouring to take reasonable steps to ensure that any third party service providers to the DBBS comply with relevant legislation.

5. CHANGES TO PRIVACY POLICY

The DBBS may change the terms of this Policy at any time by updating this document. The updated document will be published on the DBBS website and can be accessed at any time with Beneficiaries being advised of changes in the DBBS's publication (Benefit Beat) and by notice on the DBBS's website. Should Beneficiaries continue as Beneficiaries of the DBBS or continue to use the website following notification of a change to the Policy terms, or not lodge any written objection with the Information Officer of the Society to the change in Policy, the changed terms will apply to all Beneficiaries and they will be deemed to have accepted such terms.

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

6. PERSONAL INFORMATION

Personal information includes:

- personal information collected on registering as a Beneficiary of the DBBS (see below);
- personal information collected on submission of claims and other related documentation;
- personal information collected automatically by the DBBS when a Beneficiary visits the DBBS's website; and
- personal information that the DBBS collects generally at any other time in the course of conducting its business.

but excludes:

- information that has been made anonymous so that it does not identify a specific Beneficiary;
- permanently de-identified information that does not relate or cannot be traced back to a Beneficiary specifically;
- non-personal statistical information collected and compiled by the DBBS; and
- information that Beneficiaries have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board. (Because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this Policy.)

Common examples of the types of personal information which the DBBS may collect and process include:

- **identifying information** – such as a Beneficiary's name, date of birth and identification number;
- **contact information** – such as a Beneficiary's phone number, cell phone number and email address;
- **address information** – such as a Beneficiary's physical and postal address; or
- **demographic information** – such as a Beneficiary's gender or marital status.

6.1 Sensitive personal information

- In the course of normal business, the DBBS also needs to be provided with sensitive special personal information, including but not limited to the following, for all Beneficiaries for the use as explained in paragraph 11 below;
- **financial information** – such as bank account details and salary/pension information;
- **medical information** – such as information about the Beneficiary's physical or mental health;

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

- **child information** – personal information of children who are Beneficiaries (under the age of 18).

7. ACCEPTANCE

Beneficiaries of the DBBS must accept all the terms of this Policy either when they become a member or as part of their ongoing membership of the DBBS. If they do not agree with anything in this Policy, then they may not become or remain a member, whichever is applicable. See paragraph 5 above to note how changes to the Policy will be communicated.

8. DEEMED ACCEPTANCE

By accepting this Policy, Beneficiaries are deemed to have read, understood, accepted, and agreed to be bound by all of its terms as may be updated from time to time.

9. BENEFICIARY OBLIGATION

A Beneficiary may only send the DBBS their own personal information, except where the personal information of a Beneficiary associated with the main member is sent to DBBS e.g. a dependant of the main member such as a child. In this case, the main Beneficiary will have consented to send this information to DBBS. The main Beneficiary must be a competent person who is any person who is legally competent to consent to any action or decision being taken in respect of the child.

Furthermore, the processing of this child's personal information by DBBS is also permitted in terms of POPIA because it is necessary for the establishment and exercise of a right in law e.g. managing a medical claim for a child.

10. COLLECTION OF PERSONAL INFORMATION ON REGISTRATION AS A BENEFICIARY

Beneficiaries are required to provide the DBBS with certain personal information when they register and this personal information will include:

- their **personal details** – such as their title, initials, first name, last name, marital status, employer details, email address, date of birth and identity number;
- their **contact details** – such as their home phone number, cell phone number, residential address and postal address;
- their **preferred methods of contact** (bearing in mind the DBBS's objective of distributing communications electronically);
- their **banking details**;
- the personal details of all Beneficiaries covered by virtue of membership application; and

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

- **health** - related information of all Beneficiaries covered by virtue of membership application.

The DBBS will use all personal and sensitive personal information to fulfil its duties in terms of its contractual obligation to receive and process medical claims, as contained in the Rules of the DBBS, on behalf of Beneficiaries.

The DBBS records all telephone calls made to the DBBS call centre. The DBBS may use these recordings to clarify any queries raised by a Beneficiary as to the information disclosed during a telephone conversation, or for training purposes.

11. PURPOSE FOR COLLECTION

The DBBS may use any personal information that Beneficiaries provide to:

- allow the DBBS to process a Beneficiary's medical claims and to make payment to service providers on the Beneficiary's behalf, as provided for in the Rules of the DBBS;
- determine the overall sustainability of the DBBS;
- send Beneficiaries their weekly / monthly statements or other communication as appropriate;
- manage a Beneficiary's medical accounts and payments effectively;
- monitor website usage metrics, such as total number of visitors and pages accessed; and
- facilitate member Trustee election processes where applicable.

12. USE

The DBBS may use a Beneficiary's personal information to fulfil its obligations to each applicable Beneficiary in terms of the applicable legislation and the Rules of the DBBS.

13. DISCLOSURE

13.1 Sharing

The DBBS may share relevant Beneficiary personal information to the extent required, with the following entities. Prior to the sharing of Beneficiary personal information with third parties where applicable, the DBBS will conclude formal agreements with such parties to ensure that personal information remains protected and confidential and that the information shared is limited to that required to perform the task at hand and only used for the purpose for which that provider has been provided access to it.

The DBBS may share personal information with the following entities:

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

- the De Beers group of companies and De Beers Pension Fund to facilitate medical co-payment collections and any other function deemed to be in the best interest of Beneficiaries;
- the De Beers Pension Fund so as to promote administrative efficiency through the transfer of limited relevant personal information (where appropriate); and
- DBBS service providers providing consulting and other services, including auditing services, legal services, actuarial services, claims processing, technology services and other consulting services;
- other third parties who provide the DBBS with relevant services where appropriate; and
- other medical schemes should a Beneficiary resign from the DBBS and join another medical scheme in order to facilitate an efficient change to another scheme.

13.2 Legal Disclosures

The DBBS will need to disclose personal information about Beneficiaries when required by law, subpoena, or other legal process or if the DBBS has a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce the DBBS agreements with Beneficiaries, (3) investigate and defend the DBBS against any third-party claims or allegations, or (4) to exercise or protect the rights and safety of DBBS Beneficiaries, DBBS staff, or others.

The DBBS will notify Beneficiaries about legal demands for their personal data when appropriate in its judgment, unless prohibited by law or a court order or when the request is an emergency. The DBBS may dispute such demands if they are regarded as being ill considered, vague or lack proper authority, but will not challenge every demand.

13.3 Sale of personal information

The DBBS will not sell any Beneficiary's personal information. No personal information will be disclosed to any party except as provided for in this Privacy Policy.

13.4 DBBS Employees

The DBBS needs to disclose a Beneficiary's personal information to DBBS employees who require such personal information to perform their duties.

13.5 Change of ownership

Should the DBBS undergo an amalgamation with another medical scheme the DBBS may assign the DBBS rights to the personal information to an amalgamation partner. The DBBS will disclose the amalgamation to Beneficiaries on the DBBS website and through other communication vehicles.

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

13.6 Security

The DBBS will endeavour to ensure reasonable security of personal information and to comply with applicable data protection laws. The DBBS's website hosting company will host the DBBS website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders.

In terms of hardcopy documentation, the DBBS will ensure that these records are reasonably secured and that only authorised parties have access to the information.

14. ACCURATE AND UP-TO-DATE INFORMATION

The DBBS will attempt to keep the personal information it collects as accurate, complete and up-to-date as is necessary for the purposes as defined in this Policy (see paragraph 11). From time to time the DBBS may request members to update their personal information. Members are able to update any of their (or their Beneficiaries') personal information that the DBBS holds by completing the required Personal Information Update form available on the DBBS's website or by requesting the form by phoning the DBBS or by emailing the DBBS. The DBBS may require that some of the documents that are submitted to the DBBS be certified in order to update certain personal information. Some personal information is reflected on monthly member benefit statement. Any changes that are required should be advised to the DBBS as soon as possible by completing the required form and supplying the required documents as may be necessary.

15. RETENTION

The DBBS will only retain a Beneficiary's personal information for as long as it is necessary to fulfil the purposes as set out in this Policy (see paragraph 11) at its discretion in physical or electronic record format, unless:

- retention of the record is required or authorised by law; or
- a Beneficiary has provided consent to the DBBS to retain their record.

During the period of retention, the DBBS will continue to abide by the DBBS's non-disclosure obligations and will not share or sell a Beneficiary's personal information in contravention of this policy.

16. TRANSFER TO ANOTHER COUNTRY

The DBBS will only transfer any Beneficiary's personal information across the RSA border in order to fulfil its contractual obligations to Beneficiaries and by accepting this Policy the Beneficiary consents to this transfer.

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

17. LIMITATIONS

Although the DBBS enters into formal agreements with its third party service providers to ensure that Beneficiaries' personal information remains protected and confidential and is only used for the purpose for which it has been provided, it is not responsible for, nor provides any warranties, nor makes any representations in respect of the privacy policies or practices of any third party service providers, although reasonable attempts to ensure that the safety and security of members' personal information will be made.

18. ENQUIRIES

Any Beneficiary questions or concerns arising from this Policy, or the way in which the DBBS handles personal information, may contact the DBBS as follows:

Email benefitpost@dbbs.co.za (For attention the Information Officer)

Switchboard 053 807 3111

Office hours 08h00 – 12h45
14h00 – 16h30

Postal address P. O. Box 1922
Kimberley
8300

19. AUTHORISATION AND APPROVAL

Approved by the Board of Trustees.



CHAIRPERSON OF THE DBBS
C J Blanckenberg

Date: 16/4/2018

POLICY					
Owner	De Beers Benefit Society (DBBS)				
Subject	Privacy Policy				
Revision no	1	Review cycle	Annual	Effective date	28 March 2018

20. REVISION HISTORY

REVISION NO	DATE REVIEWED	DATE APPROVED	MINUTE NO
1	Created	28 March 2018	5.18.7