



PROTECTION OF PERSONAL INFORMATION POLICY

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1. Purpose and Scope

- 1.1 This Policy is issued in line with the Protection of Personal Information Act, Act 4 of 2013 (“POPIA”) and the Promotion of Access to Information Act, Act 2 of 2000 (“PAIA”). These Acts define the framework within which Moruo Life collects, holds, uses, shares, and disposes of personal information.
- 1.2 Moruo Life Limited (“Moruo Life”, “we”, “us”, or “our”) is a licensed life insurer operating within the Republic of South Africa. We, as Moruo Life, are fully committed to protecting the personal information of our clients and members, and to conducting our business in a lawful, transparent, and accountable manner, in accordance with the afore-mentioned legislation

2. Definitions

For the purposes of this Policy, the following definitions shall apply:

“Child” means a person under the age of 18 years;

“Consent” means any voluntary, specific and informed expression of will in terms of which permission is given for the processing personal information;

“Data subject” means the natural or juristic person to whom personal information relates, such as an individual member, employee or an entity that provides Moruo Life with products or services;

“Information Officer” means the head of a private body. Once appointed the Information Officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties. Deputy Information Officers can also be appointed to assist the Information Officer;

“Deputy Information Officer” means the person to whom any power or duty conferred or imposed on an Information Officer in terms of POPIA has been delegated;

“Information Regulator” means the Regulator established in terms of section in terms of section 39 of the POPIA

“Operator” means a person processing personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party e.g. a third party service provider that has contracted with Moruo Life to shred documents containing personal information.

“Processing” means any operation or activity or any set of operations, whether by automatic means or not, concerning personal information, including-

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or products and legal matters relating to those products; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information.

“Record” means any recorded information-

- a) regardless of form or medium, including any of the following;
 - (i) writing of any material;
 - (ii) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - (iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - (iv) book, map, plan, graph or drawing;
 - (v) photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced;
- b) in the possession or under the control of a responsible party;
- c) whether or not it was created by a responsible party and regardless of when it came into existence.

“Responsible party” means a public or private body or any other person which, alone or in conjunction with others determines the purpose of and means for processing personal

information.

“Person” means a natural person or a juristic person;

“Personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person and;
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

“Private body” means-

- a) natural person who carries or has carried on any trade, business or profession, but only in such capacity;

- b) a partnership which carries or has carried any trade, business or profession;
- c) any former or existing juristic person but excludes a public body.

“Special personal information” means personal information concerning –

- a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- b) the criminal behaviour of a data subject to the extent that such information relates to-
 - i) the alleged commission by a data subject of any offence; or
 - ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

3. Information Officer & Deputy Information Officer

- 3.1 In line with Section 55 of POPI Act, Moruo Life has appointed an Information Officer, as well as a Deputy Information Officer. The Information Officer bears overall accountability for the implementation and enforcement of this Policy and for the lawful processing of personal information within our organisation.

Information Officer

Name: Bafedile Mafologele

Email: bafedile@sampada.co.za

Deputy Information Officer

Name: Erick Mabela

Email: compliance@moruolife.co.za

Deputy Information Officer

Name: Roomanah Hassen-Bootha

Email: roomanah@moruolife.co.za

- 3.2 All queries, requests, and complaints relating to the processing of personal information must be addressed to the Information Officer in the first instance.

4. Principles

Moruo Life is committed to complying with all applicable regulatory requirements relating to the collection and processing of personal information. All employees and persons acting on behalf of Moruo Life will be subject to, and act in accordance with, the following principles:

Principle 1: Accountability and open communication

Reasonable measures will be taken to ensure that data subjects are made aware that their personal information is being collected (directly from the data subject or from an external source e.g. scheme data).

Principle 2: Processing limitation

Moruo Life will ensure that personal information under its control is processed in a fair, lawful and non-excessive manner that does not infringe the privacy of the data subject. Moruo Life will inform the data subject of the reasons for collecting their personal information and obtain written consent, where required, prior to processing personal information. Where applicable, the data subject will be informed of the possibility that their personal information will be shared with other entities within Moruo Life or its authorised service providers, and be provided with reasons for doing so.

Principle 3: Purpose specification

Moruo Life will process personal information only for specific, explicitly defined and legitimate reasons. Data subjects will be informed of these reasons when collecting or recording the data subject's personal information.

Principle 4: Further processing limitation

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Principle 5: Information quality

Moruo Life undertakes to take reasonable steps to ensure that personal information collected is complete, up to date, accurate and not misleading. Where personal information is collected or received from third parties, Moruo Life will take reasonable steps to confirm that the information is correct by requesting the third party confirm the accuracy of the information.

Principle 6: Security safeguards

Moruo Life undertakes to secure the integrity and confidentiality of personal information in its possession, as personal information is at great risk of loss, breach of confidentiality, corruption, hacking or theft. Moruo Life will provide the necessary reasonable security of data and keep it in accordance with prescribed legislation. Moruo Life's outsourced service providers as defined in the outsourcing policy, are required to enter into agreements with Moruo Life where both parties undertake their mutual commitment to POPIA and the lawful processing of personal information as defined by POPIA and under this policy.

Principle 7: Processing of personal information

Personal Information will only be used for the purpose for which it was collected and agreed upon. This may include, but not limited to:

- For underwriting purposes;
- Assess and process claims;
- Confirm, verify and update members and client details;
- For purposes of claims history;
- For the detection and prevention of fraud, crime, money laundering or any other misconduct; and
- In connection with legal proceedings.

Personal Information that is received via a third party for further processing, this further processing must be compatible with the purpose for which the data was initially collected.

Principle 8: Data subject participation

A data subject may request access, correct or delete their personal information held by Moruo

Life.

5. Personal Information We Collect

The categories of personal information we may collect, depending on the nature of our relationship with you, may include, but are not limited to the following:

5.1 Identity and Contact Information

- Full name, date of birth, gender, and nationality;
- Identity number or passport number;
- Residential and postal addresses;
- Email addresses and telephone numbers;
- Next-of-kin and beneficiary details.

5.2 Financial and Insurance Information

- Bank account details;
- Income, employment, and tax information;
- Policy details, premium history, and claims records;
- Tax identification numbers (TIN) and SARS correspondence.

5.3 Behavioural and Technical Information

- IP addresses and browser/device identifiers when you visit our website;
- Cookies and usage data relating to your interactions with our digital platforms;
- Communication records, including call recordings for quality and compliance purposes.

6. Purposes for which information is processed

6.1 Moruo Life processes personal information strictly for specified, explicit, and legitimate purposes. We do not process personal information in a manner that is incompatible with those purposes. Our primary processing purposes include:

- Underwriting and risk assessment;
- Administering existing policies, including collecting premiums and managing changes;

- Assessing, investigating, and settling claims;
- Fulfilling our legal and regulatory reporting obligations, including under FICA, SARS, and the Prudential Authority;
- Conducting fraud prevention, detection, and risk management activities;
- Communicating service updates, policy information, and legally required notifications;
- Improving our products, services, and internal processes through analytics and research;
- Training staff and monitoring service quality;
- Establishing, exercising, or defending legal claims and rights;
- Customer engagement and service.

6.2 Where we process personal information for a new purpose that is materially different from the original purpose disclosed at the time of collection, we will notify you and, where required, seek fresh consent.

7. Processing of Special Personal Information

7.1 Moruo Life recognises that certain categories of personal information require heightened protection given their sensitive nature. We will only process special personal information in the following circumstances:

- You have given us explicit, written consent for such processing;
- Processing is necessary to comply with an obligation of international public law;
- Processing is for historical, statistical, or research purposes and appropriate safeguards are in place;
- The information has been made public by you;
- Processing is necessary for the establishment, exercise, or defense of a legal claim;
- Processing is required by law or to protect your vital interests where consent cannot be obtained.

7.2 We apply additional technical and organisational safeguards to special personal information, including restricted access controls, enhanced encryption, and more frequent access audits. Staff who handle special personal information are subject to enhanced training and

confidentiality obligations.

8. Processing of Children's Personal Information

- 8.1 Moruo Life recognizes the heightened vulnerability of children and does not knowingly collect personal information from minors (persons under the age of 18) without the prior consent of a competent person, such as a parent, guardian, or other person legally responsible for the child.
- 8.2 Where we hold information about minor beneficiaries or dependents on existing policies, such information is held strictly for the purpose of administering the policy and paying benefits upon the occurrence of an insured event. Such information is afforded the highest level of protection within our information security framework.

9. Information Security and Safeguards

Moruo Life has implemented and maintains appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised access, use, alteration, disclosure, or destruction. Our information security programme complies with the required international standards and includes, among others, the following measures:

9.1 Technical Controls

- End-to-end encryption of personal information in transit and at rest;
- Multi-factor authentication for access to systems holding personal information;
- Regular vulnerability assessments and penetration testing;
- Network monitoring, intrusion detection systems, and firewalls;
- Automated data loss prevention (DLP) tools.

9.2 Organisational Controls

- Role-based access controls limiting personal information access to authorised personnel only;
- Mandatory annual information security and POPIA awareness training for all staff;
- Confidentiality agreements with employees, contractors, and service providers;

- Regular internal and external audits of information processing activities;
- A formal Information Security Policy and incident response plan.

9.3 Security Compromise Response

In the event of a security compromise or data breach that may adversely affect any personal information, Moruo Life will notify the Information Regulator and any affected data subjects as soon as reasonably possible after discovering the compromise. Our notification will include a description of the possible consequences of the compromise and the measures we have taken or intend to take to address it, as well as implementing risk mitigation measures.

10. Retention of Personal Information

10.1 Moruo Life will not retain personal information for longer than is necessary for the purpose for which it was collected, unless:

- Retention is required or authorised by law;
- Moruo Life is legally required to retain the information for evidentiary purposes;
- Retention is reasonably necessary to protect your or our legitimate interests.

11. Sharing of Personal Information

Moruo life may share personal information only in the following circumstances and only to the extent strictly necessary for the relevant, lawful processing purpose:

11.1 Authorised Third-Party Operators

Moruo Life engages carefully with selected third-party operators who process personal information on our behalf under written agreements that require them to maintain appropriate confidentiality and security measures. These include:

- Reinsurers and co-insurers for risk transfer purposes;
- Claims administrators and loss adjusters;
- Actuarial, legal, compliance and audit service providers;

- IT service providers, cloud computing platforms, and system integrators;
- Credit bureaus and fraud prevention organisations;
- Printing and postal service providers for policyholder communications.

11.2 Regulatory and Legal Disclosure

We may disclose personal information to regulators, law enforcement agencies, courts, and public bodies where required or permitted by law, including:

- The Financial Intelligence Centre (FIC);
- The South African Revenue Service (SARS) for tax reporting;
- The Financial Sector Conduct Authority (FSCA) and Prudential Authority;
- Courts of law in connection with legal proceedings.

11.3 Business Transactions

In the event of a merger, acquisition, restructuring, or sale of all or part of our business, personal information may be transferred to the acquiring entity, subject to appropriate safeguards and notification to affected data subjects where required.

12. Cross-border transfer of Personal Information

12.1 Moruo Life does not plan to transfer your personal information beyond the borders of the Republic of South Africa. However, in the unlikely event of Moruo Life having to transfer personal information outside the borders of the Republic of South Africa, Moruo Life will ensure that such transfers comply with the requirements of Section 72 of POPIA. Specifically, we will only transfer personal information to a foreign country where:

- The foreign country affords an adequate level of protection that is substantially similar to the conditions prescribed in POPIA;
- The data subject has given express consent to the transfer;
- The transfer is necessary for the conclusion or performance of a contract in the interest of the data subject;

- The transfer is for the benefit of the data subject and it is not reasonably practicable to obtain consent, and the data subject would, in all likelihood, provide such consent if asked;
- We have entered into a binding agreement with the recipient that imposes obligations equivalent to those under POPIA (including provisions for onward transfer).

13. Your rights as a Data Subject

The POPI Act grants data subjects a set of rights with respect to the processing of their personal information. Moruo Life is committed to honouring these rights and without undue formality. Your rights are as follows:

13.1 Right of Access

You have the right to request confirmation from us as to whether we hold personal information about you, and to access that information. Access requests should be submitted using the Promotion of Access to Information Act (PAIA) request form addressed to our Information Officer. We will respond within 30 days of receiving a valid request, or within such extended period as permitted by the PAIA.

13.2 Right to Correction and Deletion

You have the right to request that we correct or delete personal information that is inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained. We will act on your request within a reasonable period and notify you of the outcome.

13.3 Right to Object

You have the right to object, on reasonable grounds, to the processing of your personal information.

13.4 Right to Complain

Data subjects have the right to complain in the event where any of their rights in terms of POPIA have been infringed. Moruo Life takes all complaints in a serious light and will address all personal information/privacy related complaints in accordance with its documented procedure.

If you believe that Moruo Life has processed your personal information in violation of the POPIA, we encourage you to contact Moruo Life directly at complaints@moruolife.co.za in the first instance so that we can address your concerns internally before escalation to the Regulator of South Africa at the following address:

Information Regulator: Woodmead North Office Park, 54 Maxwell Dr., Woodmead,
Johannesburg, 2191

Email: POPIAcomplaints@inforegulator.org.za

Telephone: 0800017160 (Toll Free)

Website: www.inforegulator.org.za

14. Policy Review and Updates

Moruo Life will review this Policy annually or whenever there is a material change in our processing activities, applicable law, or regulatory guidance. The current version of this Policy is always available on our website at www.moruolife.co.za.

15. Document Control

Version	Effective date	Changes	Revision date
V1	11 May 2026	Policy established	10 May 2027