

DIGIWILL'S POPI NOTICE

1. INTRODUCTION

DigiWill (Pty) Ltd is committed to ensuring the privacy and integrity of information submitted by data subjects on our website. All information of a personal nature submitted or provided by data subjects will be treated with confidentiality and will not be disclosed to any person without express consent of the data subject concerned. However, any information provided or submitted by a data subject may be disclosed where such information is in the public domain or DigiWill (Pty) Ltd is obliged in terms of any law, order of court, legal process, or other lawful reason to disclose such information.

This POPI Notice sets out how DigiWill collects and processes your personal information so that it can complete business operations around Wills, Financial services and testament drafting and it also applies to the tech platform/ website of DigiWill.

2. WHAT PERSONAL INFORMATION WE COLLECT

2.1 *User information*

DigiWill sole purpose is to collect the information that you voluntarily submit while using the platform, to generate your Will and provide Financial services. The information collected are your details disclosed including but not limited to the following:

- Personal information –
 - Full names, address, marriage details and
 - Typical SEC status - smoking status, highest education, Income band
 - Identity number, , email address, telephone number, cellular number,
 - Personal information of members associated to you and that are listed in your Will.
 - Pets Name and Type
- Details as well as contact details of Executors, Trustees, Guardians, Children, Family members and other associated people included in your Will
- Distribution of your Estate – special bequests and residue.
- Last wishes .
- Personal information of Nominations for Executors, Trustees, and Guardians.

- Assets and investments information.
- Nomination of Beneficiaries, including Children's details .
- Banking details.
- Any other information required by DigiWill, the insurers, or third parties in order to create a Will and Testament, use of the calculator to illustrate estate costs, get a quote for DigiProtect Estate insurance, and issue a policy digitally.

When you contact our Support team or provide feedback, we may collect this information that you submit.

2.2 Information from other sources.

This may include:

- **Referrals;** users providing information of a Data subject in connection with referral programmes.
- **Third-party links.** You acknowledge that third parties that have links on their communications may also collect your Personal Information. You agree that the information processing practices of those third parties are neither under our control nor regulated by this Privacy Policy and that we cannot accept liability for such practices. Please make sure that you are aware of third parties' particular information processing practices.
- Publicly available sources.

3. HOW DIGIWILL USES YOUR PERSONAL INFORMATION

3.1 Providing services and features

Your information will only be used for the specific purpose for which it was intended. These may include:

- Creating a Last Will and Testament using the DigiWill website, or any changes and edits thereto.
- Determining illustrative estate admin costs for each data subject.
- Provide a quote and digital journey for issue of DigiProtect Estate Insurance.
- Providing a quote for other Financial Services offerings.
- Process your requests or instructions that are received digitally or through the support line.
- Underwriting.
- Assessing and processing claims.

- Claims history and reporting.
- Detection of fraud, crime, money laundering or other malpractice.
- Auditing and record keeping.
- Tracing of Legatees and beneficiaries
- legal proceedings; and
- complying with legal and regulatory requirements.

3.2 Safety and security

To maintain the security of our services, we may use your data in a safe and regulated manner.

3.3 Customer support

DigiWill uses the information we collect to assist you when you contact customer support, including to:

- Investigate and address your issues, concerns, and questions.
- Supporting your user journey and facilitating edits and inputs while creating a Will on the DigiWill platform.
- Monitor and improve our response to support issues.

3.4 Communications from DigiWill

DigiWill may use information you provided to communicate with you, regarding marketing materials that are aligned to needs determined from the platform.

DigiWill may also use the information provided by you on the platform to promote and provide you with relevant financial service offerings, adverts and content about our services.

4. HOW WE COLLECT PERSONAL INFORMATION

We may collect your personal information in several ways while interacting with the DigiWill team, these may include:

- through the website / tech platform where you proceed on the user journey providing relevant information on appropriate pages for your Will.
- when you engage with DigiWill team or consultants to solicit DigiWill's products or services.
- when our support team responds to your enquiries and requests.
- when we obtain feedback from you about our services; and

We may also collect your personal information from third-party sources and third parties including public databases, business partners with whom we offer co-branded services or engage in joint marketing activities, and third parties that provide list enhancement or similar services, to the extent that this is permitted by applicable law.

5. LEGAL GROUNDS FOR PROCESSING

By virtue of your engagement with DigiWill, you acknowledge that DigiWill shall have the right to process Personal Information provided to DigiWill by you or some other party, to enable DigiWill to fulfil an obligation to you in terms of its financial and estate planning offerings.

Personal Information may also be used based on the legitimate interests pursued by DigiWill, except where such interests are overridden by your interests or fundamental rights and freedoms which require the protection of your Personal Information.

In the event that you refuse to permit DigiWill to utilise your Personal Information in the manner described in this Privacy Notice, DigiWill will revoke your access to the use of its services.

6. TRANSFERS TO THIRD PARTIES

DigiWill may share the information we collect with:

- Old Mutual Alternative Risk Transfer Limited (Insurer)
- Shackleton Life (Binder Holder)

6.1 DigiWill service providers and business partners

DigiWill may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

- payment processors and facilitators.
- cloud storage providers.
- marketing partners and marketing platform providers.
- data analytics providers.
- research partners.
- vendors that assist DigiWill to enhance the safety and security of its business activities.

- consultants, lawyers, accountants, and other professional service providers; and
- insurance and financing partners.
- Binder function business partners
- Platform software developers
- SAAS partners

6.2 Other entities for legal reasons or in the event of a dispute

DigiWill may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process, or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

6.3 With your consent

DigiWill may share your information other than as described in this notice if we notify you and you consent to the sharing.

7. CROSS-BORDER DATA TRANSFERS

DigiWill currently have no reasons to conduct cross border Data transfers, however if your data were to be subjected to cross-border data transfers DigiWill would implement the following process. When making cross-border transfers of Personal Information.

- When Personal Information is processed in other countries, we will ensure that the level of protection of your Personal Information will be the same as or higher than in South Africa, as required in terms of South African law.
- Protection of this information will be the top priority.

8. RETENTION

We will keep your Personal Information only for as long as it is necessary to achieve the purpose for which it was collected or subsequently Processed, unless the requirements are different in instances as set out below.

- **Law.** We are required or authorised by law to keep your Personal Information for a longer period.
- **Lawful purposes.** We require the Personal Information for lawful purposes relating to our functions or activities.
- **Legal rights.** We require the Personal Information to exercise or defend our legal rights.

- **Statistics.** We require the Personal Information for historical, statistical or research purposes (such information will be anonymised).
- **Contractual.** We require the Personal Information because of our contract with you.

DigiWill may also retain certain information, of the data subject who have taken up Financial Services, including a DigiProtect policy through the platform. We retain such information for as long as required by law or for as long as they maintain paid up premiums and the policy are in active status. We will then maintain the record for a further 5 years before destroying it.

9. SECURITY OF YOUR PERSONAL INFORMATION

DigiWill is committed to protecting your personal information from misuse, loss, unauthorised access, modification, or disclosure by using a combination of physical, administrative, and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same. We will take all reasonable measures to ensure that the information you transmit to us using our website will remain confidential and protected from unauthorised access.

Keeping secure all the Personal Information associated with you is of the utmost importance to us. While we exercise great care in providing secure transmission of your Personal Information, no data transmission over the Internet can be guaranteed to be 100% secure.

10. WEBSITE

By using the DigiWill website/platform, you accept that your Personal Information may be disclosed to DigiWill employees, service providers and Partners and marketing agents where this information is necessary for them to offer, evaluate and enhance products and services offered on the DigiWill website.

11. DIRECT MARKETING

As our client, we are allowed to send you marketing material relating to the financial services offered around the intent of you doing a Will digitally.

You may opt out of receiving further marketing materials from us at any time and manage your communication preferences by:

- following the unsubscribe instructions included in each marketing email or SMS text message from us; or

- sending an email to support@digiwill.co.za including your details and a description of the marketing material you no longer wish to receive from us. Your request will be actioned within 48 hrs from the receipt of correspondence.

If you opt out of receiving marketing-related communications from us, we may still send you administrative messages as part of your ongoing use of our website, solutions, products, or services.

We do not provide your Personal Information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute, or otherwise make Personal Information commercially available to any third party.

12. SOCIAL MEDIA

We operate and communicate through our designated social media channels, pages, and accounts to inform, help, and engage with our users. We monitor and record comments and posts made about us on these channels so that we can improve our services.

The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials.

- We do not endorse the social media sites themselves, or any information posted on them by third parties or other users. When you engage with us through social media, your personal information may be processed by the site owner; this processing occurs outside of our control and may take place in a country outside South Africa that may have different privacy regulations.
- We regularly update and monitor our social media accounts and offer is as communication platform to show where we can do better and share ideas. We try to join conversations whenever possible but cannot guarantee that we will read or reply to all messages sent to official DigiWill social media accounts.
- Consistent feedback and helpful suggestions will be given to the relevant people within the company for consideration, but we cannot guarantee that any feedback or suggestions will be acted upon by DigiWill team.
- We align our content to the community standards that these social platforms condone.

13. CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice at any time. The most updated version will always be available on www.digiwill.co.za.

14. YOUR RIGHTS

Upon your request, we will provide you with access to any Personal Information on you that we may hold. You may also request us to correct your Personal Information, at any time. You can contact us on support@digiwill.co.za to request access to your personal information or the correction of your personal information.

- You can also seek to be removed from any of DigiWill subscriptions lists at any time by contacting us on support@digiwill.co.za.

If you have any complaint about the way in which DigiWill handles your Personal Information, you may lodge a complaint with DigiWill directly by emailing support@digiwill.co.za and indicating on the subject line POPIA.

- Should you be unhappy with the way your complaint has been managed, you can lodge a complaint with the South African Information Regulator (IR@justice.gov.za).

If you still feel that your Personal Information has not been handled appropriately according to the law, you can contact South African Information Regulator (infoereg@justice.gov.za) and file a complaint with them.

