

## Third-Party Privacy Notice

(In accordance with the Protection of Personal Information Act, No. 4 of 2013 – “POPIA”)

### 1. Introduction

Credora Financial Services (Pty) Ltd (“Credora”, “we”, “our”, or “us”), an authorised Financial Services Provider (FSP No. 43148), respects the right to privacy and is committed to protecting the personal information of all data subjects with whom we engage, including third parties such as product suppliers, brokers, administrators, contractors, service providers, and business partners.

This notice sets out how we collect, process, share, and protect personal information of third parties in compliance with the Protection of Personal Information Act (POPIA) and applicable South African privacy and financial sector laws.

### 2. Scope

This notice applies to all third parties who provide services to, receive services from, or otherwise interact with Credora Financial Services in the course of its short-term insurance and financial administration operations.

Third parties include, but are not limited to:

- Insurers, underwriting managers, and binder holders;
- Brokers, agents, and sub-administrators;
- External service providers such as assessors, loss adjusters, IT vendors, and marketing providers;
- Contractors and consultants; and
- Any legal or regulatory entity to whom we are obliged to disclose information.

### 3. Personal Information We May Collect

Credora may collect and process personal information relating to third parties, including but not limited to:

- Names, contact details, company registration information, and FSP or VAT numbers;
- Banking details for payment and commission purposes;
- B-BBEE certificates, professional qualifications, or accreditation information;
- Contractual and correspondence records; and

- Any information required for compliance with legislation (e.g., FAIS, FICA, FSCA regulations).

#### 4. Purpose of Processing

Personal information is collected and processed to:

- Facilitate contractual and business relationships;
- Fulfil our legal and regulatory obligations;
- Verify supplier, contractor, or intermediary credentials;
- Conduct due diligence and risk management;
- Administer payments, claims, and service agreements;
- Maintain communication and provide updates on products or compliance requirements;
- Detect, prevent, or investigate fraud, corruption, or unauthorised activity; and
- Ensure compliance with applicable legislation and industry standards.

#### 5. Lawful Basis for Processing

Credora processes personal information in terms of section 11 of POPIA on one or more of the following grounds:

- The data subject's consent;
- Performance of a contract or legitimate business obligation;
- Compliance with legal or regulatory duties;
- Protection of legitimate business interests; and
- To pursue or defend legal rights or claims.

#### 6. Sharing of Information

Personal information may be shared, where necessary, with:

- Insurers, underwriting managers, and reinsurers;
- Regulatory authorities such as the Financial Sector Conduct Authority (FSCA), FAIS Ombud, or Information Regulator;
- Professional advisors, auditors, and compliance officers;
- IT, system, and data-hosting providers who maintain strict confidentiality standards; and
- Other third parties as required by law or for the purpose of fulfilling our contractual obligations.

All recipients of shared information are required to comply with equivalent data protection and confidentiality standards.

## 7. Data Retention

Personal information will be retained only for as long as necessary to fulfil the purpose for which it was collected or as required by law, including the FAIS General Code of Conduct, Financial Intelligence Centre Act (FICA), and other regulatory frameworks—generally for five (5) years after the termination of the relationship.

## 8. Information Security

Credora implements appropriate technical and organisational safeguards to protect personal information against loss, unauthorised access, disclosure, or destruction. These measures include:

- Controlled access management;
- Data encryption and secure storage;
- Employee confidentiality undertakings; and
- Regular review of security and privacy compliance.

## 9. Cross-Border Transfers

Where necessary, personal information may be transferred across borders for legitimate business purposes (e.g., cloud hosting, reinsurer engagements). Such transfers will only occur where the receiving party is subject to privacy laws or binding agreements that provide a level of protection substantially similar to that afforded under POPIA.

## 10. Data Subject Rights

Third parties have the right to:

- Access, correct, or update their personal information;
- Object to or limit the processing of personal information;
- Withdraw consent (where applicable);
- Request deletion, subject to legal retention obligations; and
- Lodge a complaint with the Information Regulator ([www.inforegulator.org.za](http://www.inforegulator.org.za)).

Requests may be directed to [privacy@credora.co.za](mailto:privacy@credora.co.za).

## 11. Updates to This Notice

Credora may update this Third-Party Privacy Notice from time to time to align with legal or operational changes. The latest version will always be available on request or via our official communication channels.

## 12. Contact Information

Credora Financial Services (Pty) Ltd

Authorised Financial Services Provider | FSP No. 43148

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🕒 Office Hours: Monday to Friday 08:00 – 16:30

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