Privacy Policy

Corporate Governance & Compliance
Version 1.0 (2026)

The purpose of a FAIS (Financial Advisory and Intermediary Services) Privacy Policy is to outline how Financial Services Providers (FSPs) process, store, and protect your personal and financial data. It ensures that institutions comply with data privacy laws (like POPIA) while adhering to FAIS legislation.

INTRODUCTION

This Privacy Policy applies to all personal information processed through the iMPAC website and related services. Please bear in mind that the terms and conditions of this privacy policy constitutes a legally binding agreement between you and iMPAC. By accessing, browsing and/or using this website, you acknowledge that you have read, understood, and agree to be bound by this policy, as may be amended from time to time. If you do not agree to these terms and conditions you must promptly exit the website, as further use will automatically bind you to these terms and conditions.

We are committed to protecting the personal information of iMPAC customers/visitors and value the information that you choose to provide us with. We adhere to the principles as outlined in Section 51 of the Electronic Communications and Transactions Act, 2002 (ECT Act) as well as the provisions contained in the Protection of Personal Information Act 4 of 2013 (PoPI Act). In line with these principles, iMPAC undertakes:

- Obtain your permission to process your personal information;
- Inform you, upon request, of the specific purpose for which we process your personal information;
- Only use your personal information for the purpose for which it was obtained and not for any other purpose, unless you give us your express permission to do so or unless we are required to do so by law;
- Retain personal information in accordance with applicable statutory retention periods and iMPAC's Information Management Policy, after which such information is securely destroyed or anonymised where appropriate;

WHAT IS PERSONAL INFORMATION?

Personal information is defined as any information provided by you to us over the internet or any other channel; for instance, when obtaining an online quotation, acquiring or using a registration in a survey or when making entries into a forum or social media platform. In terms of PoPI, Personal Information is defined as: *information relating to a natural/juristic person, including, but not limited to—*

- 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;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- when subscribing/creating an account online for the purpose of purchasing the products listed on our website;
- if you want iMPAC to contact you via our contact page or our website;
- when you enter any competition which may be run by iMPAC from time to time;
- payment information;
- the views or opinions of another individual about the person;
- 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.

(**PLEASE NOTE:** that this information, if input on our website, WhatsApp, social media pages, or captured by us will be used for the purpose of processing payments and/or refunds as may be applicable to any of your iMPAC policies. Where this payment information is input via a third party provider, this information is not collected, stored or otherwise processed by us).

PROCESSING OF YOUR PERSONAL INFORMATION

The processing of personal information includes, inter alia: collecting, storing, using, receiving, erasing, destroying, backing-up, transmitting, changing, organising and sharing of your personal information.

The type of information we collect shall depend on the purpose for which it is collected and used. We shall only collect information that we need for that particular purpose and no more than necessary. In some instances, we shall inform you what information you are required to provide to us and what information is optional.

Primarily, information shall be collected directly from you; however, we may also collect information about you from other sources, with or without your consent. We may collect information about you from sources which are publicly available. Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION

Your personal information is collected for the primary purpose of providing you with insurance cover and for all other activities and processes incidental to and relevant to this purpose, including but not limited to –

- providing you with information about our products, goods and/or services you have requested and notifying you about important changes or developments relating to these products and/or services;
- to follow up as part of our customer care procedures;
- updating our records about you;
- internal record keeping;
- to improve our products and services;
- crime detection prevention and prosecution;
- keeping you informed of promotions;
- evaluating the effectiveness of our marketing and for research, training and statistical analysis with the aim of improving our services;
- to contact you for market research purposes, where you have consented to this.

WHAT IS THE PURPOSE OF COLLECTING YOUR PERSONAL INFORMATION?

As an insurance company, we require your personal information for the following reasons, some of which are mandatory:

- process policy applications;
- administering your policy;
- underwriting purposes;
- to provide you with access to our goods, products and services, including but not limited to analysis, intermediary services in relation to your policy;
- monitor and analyse your conduct relating to the policy for fraud, compliance and other risk related purposes;
- develop new products, goods and services;
- to help us improve our offerings to you;
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- to conduct market or customer satisfaction research or for statistical analysis;
- for audit and record keeping purposes;
- in connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.
- transactional and payment-related metadata;
- device, application, and usage information;
- fraud detection, monitoring, and risk indicators.

SPECIAL PERSONAL INFORMATION

iMPAC processes special personal information, where necessary for the provision of insurance, claims, and related services. Such information is subject to enhanced safeguards, restricted access, and additional security controls in line with applicable law and internal policies.

DISCLOSURE OF YOUR PERSONAL

Your personal information shall be kept confidential; however, we shall disclose it to the following third parties as may be legally required and/or as arranged via the South African Insurance Association:

- Service providers;
- Agents;
- Insurance association or other insurers;
- iMPAC authorised personnel;
- Bryte Insurance Company Limited (Insurer);
- Court of Law;
- The Information Regulator.

We have agreements and security measures in place to ensure that all third parties to whom your personal information is disclosed comply with the terms and provisions of the PoPI Act. We ensure that third parties fully understand the duties and obligations they become encumbered with in retaining the privacy and integrity of your personal information.

SECURITY MEASURES TO ENSURE PROTECTION OF

Due to the nature of the internet, information submitted by our website may not be secure, unless submitted by/ through a secure connection. We do, however, have reasonable security measures in place to protect your Personal Information. Unfortunately, we cannot assume any guarantee for other providers whose websites you might reach through links on our website. We would also like to inform you that we cannot control the confidentiality, access or dissemination of any information that is retrieved through the use of “cookies” or information retrieved through the collecting and storing of IP addresses of visitors to this website.

ACCESS TO YOUR PERSONAL INFORMATION

You may send a request to compliance@impacuma.co.za to enquire what personal information we hold for you. We shall make the information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

CHANGES TO YOUR PERSONAL INFORMATION

PoPI requires us to store information which is accurate and updated. You may update, correct, amend or delete your personal information at any time by sending a request to info@imacuma.co.za

Please note that before any changes to your personal information are made, we will take all reasonable steps to confirm your identity.

COMPLAINTS

You have the right to address any complaints you may have regarding your personal information to our complaints department, as per our Complaint Resolution Policy, alternately you may contact the Personal Information Regulator:
The Information Regulator (South Africa)
Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
P.O Box 31533, Braamfontein, Johannesburg, 2017
Tel: 010 023 5200
Email: POPIAComplaints@inforegulator.org.za

AMENDMENTS TO THIS PRIVACY POLICY

Please note that iMPAC reserves the right to make amendments and/or changes to this privacy policy from time to time and will take all reasonable steps to inform you of any such amendments or changes. You are also requested to please check our website periodically to inform yourself of any changes.

CONSENT TO PROCESS PERSONAL INFORMATION

Consent is obtained where required by law. In other instances, personal information is processed where necessary for the performance of a contract, compliance with legal or regulatory obligations, or for legitimate operational purposes.

OTHER IMPORTANT POINTS TAKE NOTE OF:

1. All information on the website is intended as general information about our company, products and services. The information is not to be construed as advice. Always consult a professional financial advisor when making financial decisions regarding any changes to your financial services products.
2. While all attempts are made to ensure that the information published is true and correct at all times, we will not be held liable for any incorrect information published, nor will we accept any liability when you opt to use our website.

3. We own the copyright and intellectual rights to the content on our website. Please obtain permission from us before using any logo's, graphics, product information etc.
4. Should you reproduce any part of our website in any form without our consent, we are entitled to take legal action and any legal fees and/or costs will be for your account.
5. Our contact details displayed on this website may not be used for any electronic marketing or database purposes.
6. Before providing links through to our website, please obtain prior consent from us.
7. While we will attempt to ensure that our website and downloads remain virus free, we cannot control or promise that you will not be at risk while using our website.
8. We may at any time, without notice and our discretion, amend this privacy policy, suspend or terminate any functions or products on this website and from time to time perform routine maintenance on the site.

The Privacy Policy, together with the iMPAC Terms of Use which are available at www.impacuma.co.za, sets out the general rules and policies governing your use of our internet sites.