Group Privacy Notice

The Kin Group (Pty) Ltd and its subsidiaries | Version V02_2026

Document	Group Privacy Notice
Version	V02_2026
Supersedes	POPIA Privacy Notice 01/2025
Owner	Head of Risk, Legal & Compliance
Effective Date	Date of signature
Review Frequency	Annually, or earlier when our processing changes

APPROVAL AND ADOPTION

By signing below, the Head of Risk, Legal & Compliance approves and adopts this Privacy Notice on behalf of The Kin Group (Pty) Ltd and each Group Company to which it applies.

Name and Surname	Stephan Groenewald
Capacity	Head of Risk, Legal & Compliance
Signature	
Date	1 August 2026

1. ABOUT THIS NOTICE

1.1 Your privacy is important to us. This notice explains how The Kin Group and its subsidiaries collect, use, share, protect and retain your personal information, and the rights you have under the Protection of Personal Information Act No. 4 of 2013 ("POPIA").

1.2 This notice applies to prospective clients, policyholders, insured lives, beneficiaries, claimants, members of group schemes, intermediaries, website users and representatives of our suppliers and business partners. Our employees and job applicants are informed separately about the processing of their personal information.

2. WHO WE ARE

2.1 "We", "us" and "our" refer to the following companies (together "the Group"):

Company	Registration Number	FSP Number
The Kin Group (Pty) Ltd	2025/438660/07	—
MHA Management Holdings (Pty) Ltd	1996/011241/07	10134
NHB Administrators (Pty) Ltd	2017/513758/07	11314
Zazu Life (Pty) Ltd	2017/516074/07	5070
WISH Fulfilment (Pty) Ltd	2024/098721/07	**Not an FSP**
Fore Financial Services (Pty) Ltd	2024/753986/07	55301

2.2 **This Notice applies to all entities listed**.

2.3 All Group companies are located at 8 Bedford Road, St Andrews, Bedfordview, 2007, and can be contacted on 086 100 1788.

2.4 The Group company with which you deal is the responsible party for your personal information. Where we administer policies or render services on behalf of an insurer, that insurer is also a responsible party and we process your information on its behalf as its operator. The insurer's own privacy notice will also apply.

2.5 MHA Management Holdings, NHB Administrators, Zazu Life and Fore Financial Services are authorised financial services providers. They render financial services in, among others, Long-term Insurance subcategories A, B1 and B1-A, Health Service Benefits and assistance business, as reflected in each company's licence. WISH Fulfilment is not an authorised financial services provider and does not render financial services.

3. OUR INFORMATION OFFICER

3.1 If you have any question or concern about your personal information, or wish to exercise any of your rights, please contact our Information Officer:

Name	Mr Stephan Groenewald
Telephone	086 100 1788
Email	informationofficer@nhb.co.za
Address	8 Bedford Road, St Andrews, Bedfordview, 2007

4. THE PERSONAL INFORMATION WE COLLECT

4.1 Depending on your relationship with us, we may collect:

(a) **identity and contact information**, such as your name, title, identity or passport number, date of birth, gender, marital status, nationality, residency status, physical and postal addresses, telephone numbers and email address;

(b) **financial information**, such as your banking details, income, expenditure, assets, liabilities, investments and existing insurance;

(c) **employment and education information**, such as your occupation, employer, employment history and qualifications;

(d) **policy and claims information**, such as the products you hold, premiums, beneficiaries, dependants, claims history and correspondence;

(e) **special personal information**, such as health and medical information and family medical history required for underwriting and claims, trade union membership where your cover is provided through a union or scheme, and information about criminal behaviour where required for fraud prevention or regulatory checks;

(f) **information about children**, where they are insured lives, dependants or beneficiaries under a policy;

(g) **recordings and communications**, including telephone call recordings and messages exchanged with us; and

(h) **technical information**, such as your IP address, device and browser information, and information collected by cookies when you use our websites.

4.2 We process special personal information and children's personal information only where POPIA permits it, with access limited to persons who need it and who are bound by confidentiality.

5. HOW WE COLLECT YOUR PERSONAL INFORMATION

5.1 We collect personal information directly from you when you apply for a product, complete a form (in paper or electronic form), speak to a representative or our call centre, submit a claim, respond to an advertisement or campaign, or use our websites.

5.2 We may also collect personal information from other sources where the law permits, including your employer, trade union or group scheme, intermediaries and brokers, insurers and reinsurers, medical practitioners (with your authorisation), public records, credit bureaus and fraud prevention databases where applicable, and other Group companies.

6. WHY WE PROCESS YOUR PERSONAL INFORMATION

6.1 We process your personal information for the following purposes, on the lawful grounds indicated:

Purpose	Lawful ground
Providing advice, quotations, products and services you request	Conclusion or performance of a contract; consent where required
Underwriting, issuing, administering and managing policies, including premium collection	Conclusion or performance of a contract; legal obligation
Assessing and paying claims and benefits, and taking recovery action	Performance of a contract; legitimate interests
Verifying your identity and complying with anti-money laundering and sanctions obligations	Legal obligation
Preventing, detecting and investigating fraud and financial crime	Legal obligation; legitimate interests
Keeping your details accurate and up to date	Legal obligation; performance of a contract
Handling complaints, queries and requests	Legal obligation; legitimate interests
Recording calls for quality, record-keeping and dispute resolution	Legal obligation; legitimate interests
Telling you about our products and services that may interest you	Consent, or legitimate interests for existing clients (subject to your right to object)

Purpose	Lawful ground
Complying with regulatory reporting, audit and other legal requirements	Legal obligation
Statistical and actuarial analysis, product development and improving our services	Legitimate interests (using de-identified information where possible)

6.2 We will only use your personal information for another purpose if that purpose is compatible with the original purpose or if we have your consent.

7. IS PROVIDING YOUR INFORMATION COMPULSORY?

7.1 Some information is required by law or is necessary for us to conclude or perform a contract with you, such as identity information for anti-money laundering checks or medical information for underwriting. We will tell you when information is compulsory. If you do not provide it, we may be unable to provide the product or service, process your claim or comply with our legal obligations.

8. LAWS THAT REQUIRE OR AUTHORISE COLLECTION

8.1 We collect personal information in terms of, among others, the Financial Advisory and Intermediary Services Act No. 37 of 2002, the Financial Intelligence Centre Act No. 38 of 2001, the Insurance Act No. 18 of 2017, the Long-term Insurance Act No. 52 of 1998 and the Policyholder Protection Rules made under it, the Financial Sector Regulation Act No. 9 of 2017, the Tax Administration Act No. 28 of 2011 and the Companies Act No. 71 of 2008.

9. WHO WE SHARE YOUR INFORMATION WITH

9.1 We share personal information only where necessary for the purposes described in this notice, and require recipients to protect it. Recipients may include:

(a) other Group companies that provide administration, IT, finance and other shared services, or that are involved in providing your product or service;

(b) the insurers whose products we distribute or administer, and their reinsurers;

(c) your employer, trade union or group scheme, where your cover is provided through them;

(d) service providers acting on our behalf, including IT, cloud hosting, call centre, payment and collection, printing, courier, document storage and destruction providers;

(e) medical practitioners, assessors and investigators involved in underwriting or claims;

(f) our auditors, legal advisers and other professional advisers;

(g) regulators and authorities, including the Financial Sector Conduct Authority, the Prudential Authority, the Financial Intelligence Centre, the South African Revenue Service and the Information Regulator; and

(h) the National Financial Ombud Scheme South Africa, the Office of the FAIS Ombud and courts, where a complaint or dispute is referred to them.

9.2 We do not sell your personal information.

10. TRANSFERS OUTSIDE SOUTH AFRICA

10.1 Some of our service providers, including cloud hosting and software providers, may store or process information on servers located outside South Africa, including in the United States of America, the European Union, the United Kingdom, the Asia-Pacific region and Australia. We transfer personal information outside South Africa only where POPIA permits it, including where the recipient is bound by law, binding corporate rules or a binding agreement that provides an adequate level of protection substantially similar to that required by POPIA.

11. DIRECT MARKETING

11.1 If you are an existing client, we may tell you about our similar products and services. If you are not a client, we will only send you marketing by electronic means, including telephone calls, if you have given your consent.

11.2 You may opt out of marketing at any time, free of charge, by using the opt-out option in any of our communications or by contacting the Information Officer. Your opt-out will be honoured across the Group.

12. AUTOMATED DECISIONS

12.1 Some of our underwriting, claims or fraud prevention processes may use automated tools. No decision with legal or substantial consequences for you is based solely on automated processing.

13. HOW WE PROTECT YOUR INFORMATION

13.1 We take appropriate, reasonable technical and organisational measures to protect your personal information against loss, damage and unauthorised access, including access controls, encryption, secure systems, staff training and confidentiality obligations. Our service providers are contractually required to apply similar measures. If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify you and the Information Regulator as required by POPIA.

14. HOW LONG WE KEEP YOUR INFORMATION

14.1 We keep personal information only for as long as we need it for the purpose for which it was collected, or for longer where the law, a contract or our legitimate business needs require it. In general, we keep records relating to advice, policies and claims, and records required for anti-money laundering purposes, for at least five years after your policy or our relationship ends or your claim is finalised. Because complaints and claims are sometimes raised after this period, we may keep policy, claims and complaints records for longer, with access restricted to dealing with such matters, and we review this need every year. We keep information about prospective clients who do not apply for a product for 12 months after our last contact.

14.2 When we no longer need your information, we securely destroy or delete it or de-identify it so that it can no longer identify you. Where we must keep information only for purposes of proof, we restrict its use.

15. COOKIES

15.1 Our websites use cookies and similar technologies to operate properly, to remember your preferences and to analyse how they are used. You can control or delete cookies through your browser settings, although some features may not work if cookies are disabled.

16. YOUR RIGHTS

16.1 Subject to POPIA and the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"), you have the right to:

(a) ask us to confirm, free of charge, whether we hold personal information about you;

(b) request a record or description of your personal information, including the identity of third parties who have had access to it, in accordance with our PAIA manual;

(c) ask us to correct, update, destroy or delete your personal information (using Form 2 of the Regulations Relating to the Protection of Personal Information);

(d) object, on reasonable grounds, to the processing of your personal information, and object at any time to direct marketing (using Form 1 of those Regulations);

(e) withdraw your consent where we rely on it, without affecting processing that took place before withdrawal;

(f) not be subject to a decision based solely on automated processing, except as permitted by POPIA; and

(g) submit a complaint to the Information Regulator.

16.2 To exercise these rights, contact our Information Officer. The prescribed forms are available from the Information Officer, and we will help you complete them free of charge. We will verify your identity before acting on a request. Fees prescribed under PAIA may apply to requests for copies of records.

17. COMPLAINTS

17.1 If you believe that we have not processed your personal information lawfully, please contact our Information Officer first, using the form in the Annexure or by email. We will acknowledge your complaint within two working days and respond within seven working days, or tell you why we need more time.

17.2 If you are not satisfied with our response, you may submit a complaint to the Information Regulator:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 / 0800 017 160 (toll free)
Complaints email	POPIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

18. CHANGES TO THIS NOTICE

18.1 We may update this notice from time to time. The current version is available on our websites and from the Information Officer.

ANNEXURE

Complaint to the Information Officer

Please send the completed form to the Information Officer at informationofficer@nhb.co.za or 8 Bedford Road, St Andrews, Bedfordview, 2007. We may ask you for proof of identity before we deal with your complaint.

A. Your details

Name and surname	
Identity number	
Policy number (if any)	
Group company concerned	
Postal or physical address	
Telephone	
Email	

B. Details of your complaint

C. What outcome are you seeking?

D. Signature

Signature	
Date	