

#### Annexure 7b:

### PRIVACY POLICY – LEGACY UNDERWRITING MANAGERS (PTY) LTD. FSP:13783

Your privacy is important to us. Our goal is to provide you with a personalized online experience that provides you with the information, resources, and services that are most relevant and helpful to you. This Privacy Policy has been written to describe the conditions under which this web site is being made available to you. The Privacy Policy discusses, among other things, how data obtained during your visit to this web site may be collected and used. We strongly recommend that you read the Privacy Policy carefully. By using this web site, you agree to be bound by the terms of this Privacy Policy. If you do not accept the terms of the Privacy Policy, you are directed to discontinue accessing or otherwise using the web site or any materials obtained from it. If you are dissatisfied with the web site, contact us; otherwise, your only recourse is to disconnect from this site and refrain from visiting the site in the future.

The process of maintaining a web site is an evolving one, and Legacy Underwriting Managers may decide at some point in the future, without advance notice, to modify the terms of this Privacy Policy. Your use of the web site, or materials obtained from the web site, indicates your assent to the Privacy Policy at the time of such use. The effective Privacy Policy will be posted on the web site, and you should check upon every visit for any changes.

### **Links to Non-Operators Web Sites**

Legacy Underwriting Managers web sites may provide links to third-party web sites for the convenience of our users. If you access those links, you will leave Legacy Underwriting Managers web site. Legacy Underwriting Managers does not control these third-party websites and cannot represent that their policies and practices will be consistent with this Privacy Policy. For example, other web sites may collect or use personal information about you in a manner different from that described in this document. Therefore, you should use other web sites with

caution, and you do so at your own risk. We encourage you to review the privacy policy of any web site before submitting personal information.

#### TYPES OF INFORMATION WE COLLECT:

#### **Non-Personal Information**

Non-personal information is data about usage and service operation that is not directly associated with a specific personal identity. Legacy Underwriting Managers may collect and analyze non-personal information to evaluate how visitors use Legacy Underwriting Managers web sites.

### **Aggregate Information**

Legacy Underwriting Managers may gather aggregate information, which refers to information your computer automatically provides to us and that cannot be tied back to you as a specific individual. Examples include referral data (the web sites you visited just before and just after our site), the pages viewed, time spent at our Web site, and Internet Protocol (IP) addresses. An IP address is a number that is automatically assigned to your computer whenever you access the Internet. For example, when you request a page from one of our sites, our servers log your IP address to create aggregate reports on user demographics and traffic patterns and for purposes of system administration.

## **Log Files**

Every time you request or download a file from the web site, Legacy Underwriting Managers may store data about these events and your IP address in a log file. Legacy Underwriting Managers may use this information to analyze trends, administer the web site, track users' movements, and gather broad demographic information for aggregate use or for other business purposes.

#### **Cookies**

Our site may use a feature of your browser to set a "cookie" on your computer. Cookies are small packets of information that a web site's computer stores on your computer. Legacy Underwriting Managers web sites can then read the cookies whenever you visit our site. We may use cookies in several ways, such as to save your password so you do not have to re-enter it each time you visit our site, to deliver content specific to your interests and to track the pages you have visited. These cookies allow us to use the information we collect to customize your experience so that your visit to our site is as relevant and as valuable to you as possible.

Most browser software can be set up to deal with cookies. You may modify your browser preference to provide you with choices relating to cookies. You have the choice to accept all cookies, to be notified when a cookie is set or to reject all cookies. If you choose to reject cookies, certain of the functions and conveniences of our web site may not work properly, and you may be unable to use those of Legacy Underwriting Managers services that require registration to participate, or you will have to re-register each time you visit our site. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section

of the toolbar. We do not link non-personal information from cookies to personally identifiable information without your permission.

### **Web Beacons**

Legacy Underwriting Managers web site also may use web beacons to collect non-personal information about your use of our web site and the web sites of selected partners, your use of special promotions or newsletters, and other activities. The information collected by web beacons allows us to statistically monitor how many people are using our web site and selected partners' sites; how many people open our emails; and for what purposes these actions are being taken. Our web beacons are not used to track your activity outside of our web site or those of our partners. Legacy Underwriting Managers do not link non-personal information from web beacons to personally identifiable information without your permission.

### **Personal Information**

Personal information is information that is associated with your name or personal identity. Legacy Underwriting Managers uses personal information to better understand your needs and interests and to provide you with better service. On some of Legacy Underwriting Managers pages, you may be able to request information, subscribe to mailing lists, participate in online discussions, collaborate on documents, provide feedback, submit information into registries, register for events, register as a customer, or join technical committees or working groups. The types of personal information you provide to us on these pages may include name, address, phone number, e-mail address, user IDs, passwords, billing information, or credit card information, as well as company information.

#### **How We Use Your Information**

Legacy Underwriting Managers may use non-personal data that is aggregated for reporting about Legacy Underwriting Managers' web site usability, performance, and effectiveness. It may be used to improve the experience, usability, and content of the site.

Legacy Underwriting Managers may use personal information to provide services that support the activities of Legacy Underwriting Managers' customers.

## **Information Sharing**

Legacy Underwriting Managers does not sell, rent, or lease any individual's personal information or company information or lists of email addresses to anyone for marketing purposes, and we take commercially reasonable steps to maintain the security of this information. However, Legacy Underwriting Managers reserve the right to supply any such information to any organization into which Legacy Underwriting Managers may merge in the future or to which it may make any transfer to enable a third party to continue part or all of its mission. We also reserve the right to release personal information to protect our systems or business, when we reasonably believe you to be in violation of our Terms of Use or if we reasonably believe you to have initiated or participated in any illegal activity. In addition, please be aware that in certain circumstances, Legacy Underwriting Managers may be obligated to

release your personal information pursuant to judicial or other government subpoenas, warrants, or other orders.

In keeping with our open process, Legacy Underwriting Managers may maintain publicly accessible archives for most of our activities.

Please remember that any information (including personal information) that you disclose in public areas of our web site, such as forums, message boards, and news groups, becomes public information that others may collect, circulate, and use. Because we cannot and do not control the acts of others, you should exercise caution when deciding to disclose information about yourself or others in public forums such as these.

If you do not want your personal information collected and used by Legacy Underwriting Managers, please do not visit Legacy Underwriting Managers' web site or apply as a customer of any of Legacy Underwriting Managers' websites or email lists.

# **Access to and Accuracy of Member Information**

Legacy Underwriting Managers is committed to keeping the personal information of our customers accurate. All the information you have submitted to us can be verified and changed. To do this, please email us a request. We may provide customers with online access to their own personal profiles, enabling them to update or delete information at any time. To protect our customers' privacy and security, we also may take reasonable steps to verify identity, such as a user ID and password, before granting access to modify personal profile data. Certain areas of Legacy Underwriting Managers web sites may limit access to specific individuals through the use of passwords or other personal identifiers; a password prompt is your indication that a customer-only resource is being accessed.

## Security

Legacy Underwriting Managers will make every effort to protect personal information by users of the web site, including using firewalls and other security measures on its servers. No server, however, is 100% secure, and you should take this into account when submitting personal or confidential information about yourself or your company on any web site, including this one. Legacy Underwriting Managers assumes no liability for the interception, alteration, or misuse of the information you provide. You alone are responsible for maintaining the secrecy of your personal information. Please use care when use access this web site and provide personal information.

## **Opting Out**

From time-to-time Legacy Underwriting Managers may email you electronic newsletters, announcements, surveys, or other information. If you prefer not to receive any or all of these communications, you may opt out by following the directions provided within the electronic newsletters and announcements.

If you have questions regarding this privacy policy, please contact us.