

## Team Vitality – Privacy statement

**Team Vitality’s privacy statement describes how Team Vitality collects, uses and shares your personal information in line with the Protection of Personal Information Act (POPIA).**

Team Vitality is the Not-for-profit sporting organization registered as Discovery Athletic Club, in accordance with the laws of South Africa as a non-profit organization (registration number: 092-844-NPO) and further operating Team Vitality running club and Team Vitality cycling club. When you engage with Team Vitality, you are entrusting us with your personal information. We are committed to protecting your right to privacy and keeping your information safe. This Privacy Statement tells you how we collect, use and share your personal information, including personal information about your spouse and/or dependants, where applicable

### 1. DEFINITIONS

- 1.1. **We, us and our** refers to Discovery Athletic Club operating as Team Vitality NPO.
- 1.2. **You and your** refers to the holder of the Team Vitality membership.
- 1.3. **Your personal information** refers to personal information about you, your spouse, your dependents (as relevant). It includes information about health, gender, age, contact numbers and addresses.
- 1.4. **Process information** means the activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.
- 1.5. **Competent person** means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child. For example, a parent or legal guardian.

### 2. WHO ARE WE

‘We’, ‘us’, ‘our’ or ‘Team Vitality’ refers to Discovery Athletic Club operating as Team Vitality NPO. This entity is covered by this Privacy Statement. You can find us at 1 Discovery Place, Sandton, Johannesburg.

### 3. WHAT PERSONAL INFORMATION WE COLLECT AND FROM WHERE

- 3.1. We will collect personal information from you, when possible. If we are not able to, or we want to make sure that your information is up to date and accurate, we may collect your personal information from other sources. Some of the personal information we collect may be sensitive in nature. This is known as special personal information and includes information about your health, biometrics, race and any alleged criminal or objectionable behaviour. Below are the categories of personal and special personal information which we may collect about you, your spouse, dependants and from which sources.

Category	Types of Personal Information	Source
Biographic and demographic information, which may be special personal information (including details of dependants, where applicable)	Names, marital status, age and date of birth, gender or sex, relationship to dependants, race	From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Team Vitality website
Contact information	Physical address, postal	From you or your employer

(including details of dependants, where applicable)	address, telephone numbers (cell phone, home, work or preferred), email address	when you apply for or use one of our products, services, facilities, or electronic platforms such as the Team Vitality website
Financial information	bank account information	From you when you apply for or use one of our products, services, facilities or electronic platforms such as the Team Vitality website
Special personal information on criminal behaviour (including alleged criminal behaviour or objectionable conduct)	Criminal history, disciplinary history or behaviour	From regulatory authorities or industry bodies. From forensic investigators appointed by us
Administrative information	Policy, benefits, membership, rewards, statuses, claims, financial information, servicing interactions	From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Team Vitality website
Physical activity information, which may include special personal information	activity information (type, duration, location), and other details relating to physical activity and fitness	From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Team Vitality website  From Discovery Vitality
Employment information	Employment status	From you or your employer when you apply for or use one of our products, services, facilities, or electronic platforms such as the Team Vitality website
Opinions	Survey responses, commentary, or feedback	From you when you take part in a survey
Complaint information	Information about complaints submitted to regulatory or governing authorities	From you, your employer or regulatory authorities and/or ombudsmen
Biometric information, which is special personal information	Images used for facial recognition, recordings marketing purposes	From you or your employer when you apply for or use one of our products, services, facilities, or

		<p>electronic platforms such as the Team Vitality website;</p> <p>From independent third parties or partners;</p> <p>From CCTV cameras or private photographers when you visit our premises and/or affiliated race events</p>
Other	Any other personal information referred to in benefit guides and terms and conditions of specific Team Vitality products	From you or Discovery Vitality (Pty) Ltd, where applicable

- 3.2. Note: By using the Team Vitality website, you agree that we may place cookies on your electronic devices for the purposes set out in this privacy statement. The Team Vitality websites give you the option to disable or delete cookies. You can manage your preference relating to a specific type of cookie at any time on our website by visiting Cookies Settings. Note that session cookies are necessary for the operation of the Team Vitality and cannot be disabled. If you prefer not to have non-essential cookies placed on your electronic device while using the Team Vitality website, you can disable them by turning them off in your browser. However, this may affect the overall experience of access, navigation and use of the Team Vitality website. When you disable cookies, no information is gathered from your device.
- 3.3. If you are giving us the personal information or special personal information of a person under the age of 18 (a minor), you confirm that you are a Competent Person, that you are their parent or legal guardian and that you give consent for us to process their personal and/or special personal information for the purposes covered in this Privacy Statement and any other related purposes..
- 3.3.1. If you are giving consent for a person under 18 (a minor) you, as the legal guardian, further represent and warrant that that you are the authorised legal guardian, you have the legal capacity to provide consent on behalf of the minor and have not been divested of such legal guardianship and authority.
- 3.4. If you are an employer, you agree to indemnify us against any loss or damage, direct or indirect, that an employee suffers because of the unauthorised use of your employees' personal information.
- 3.5. We will keep your personal information confidential. You may have given us this information yourself or we may have collected it from other sources. If you share your personal information with any third parties, we will not be responsible for any loss suffered by you, your dependants, your spouse or your employees.
- 3.6. You have the right to object to the processing of your personal information. It is voluntary to accept these terms and conditions. However, we require your acceptance to activate and service your Team Vitality membership. This means that if you do not accept, we cannot activate and service your membership.
- 3.7. We are required to collect and keep personal information in terms of applicable laws. For more information, please have a look at our **Access to Information Manuals**.

#### **4. HOW WE WILL USE YOUR PERSONAL INFORMATION**

We use your personal information and special personal information for:

- The administration of the Team Vitality programme;
- The provision of any services that you may require on your membership;
- The rendering of services by Discovery Vitality;
- The provision of relevant information to a contracted third party who require such information to render a service to your Team Vitality membership and only if such contracted third party agrees to keep the information confidential;
- Manage promotions and competitions;
- Make you aware of benefits that you are entitled to on any of your existing products;
- Resolve your complaints or queries;
- Improve our existing products and services, and develop new products and services for the Team Vitality benefit, through research and development;
- Improve customer experience and service efficiency by conducting surveys and analysing your service interactions;
- Fulfil legal or contractual obligations, including assisting with law enforcement, anti-money laundering and counter-terrorist financing initiatives or complying with information requests by regulators and meeting our regulatory reporting obligations;
- Comply with codes of conduct and industry agreements;
- Give you rewards in relation to products you hold;

5. By accepting this Privacy Statement you provide us with your express consent that we may process (collect, store, use and share) your personal and special personal information for the following purposes:

- 5.1. Depersonalising (removing the ways in which you may be identified) your personal information and special personal information and sharing this information authorised third parties for any of the purposes mentioned in this privacy statement, but specifically for research and analysis activities;
- 5.2. Risk and Fraud prevention;
- 5.3. Market, statistical and academic research;
- 5.4. To customise our benefits and services to meet your needs

6. No personal information will be made available to a third party unless that third party has agreed to abide by strict confidentiality protocols that we require. If we publish the results of this research, you will not be identified by name. If we want to share your personal information for any other reason, we will do so only with your permission.

#### **7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

We may share your personal information with the following categories of persons/entities:

- 7.1. Contracted third parties who require the information to provide a service to you or us in relation to your Team Vitality membership, provided that the third party agrees to keep the information confidential;
- 7.2. Third parties such as academics and researchers, including those outside South Africa. We will ensure that the academics and researchers only use information that has been de-identified;
- 7.3. If we become involved in a proposed or actual merger, acquisition, or any form of sale of any assets, with third parties in connection with the transaction. In the case of a

- merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply;
- 7.4. Third parties, such as benefit partners and/or service providers, who you have already consented to receiving your personal information;
  - 7.5. Third parties, local and foreign regulatory bodies, or government institutions to whom we have a legal or contractual duty to give your personal information;
  - 7.6. If you have joined as a member of an employer group, your employer may be provided information that is relevant to your application and ongoing administration of the product, benefit or membership;
  - 7.7. A foreign regulator or law enforcement body, where required in terms of foreign legislation applicable to Team Vitality.

In all other instances, we will ask for your consent to share personal information, unless we are permitted to do so in terms of applicable law.

8. By accepting this Privacy Statement, you agree that we may decide how long we need to keep your personal information for our business purposes.
9. You may withdraw your consent and we will destroy or delete your personal information unless the law allows or requires us to keep it. Where we cannot delete your personal information, we will take steps to make it anonymous.
10. We have put reasonable security measures in place based on the sensitivity of the information which we hold. We have put measures in place to protect your personal information from being disclosed without your authorisation and to prevent loss or misuse. No method of transmission over the internet, or method of electronic storage, is 100%. While we strive to use commercially acceptable means to protect your personal information, you acknowledge that no protection which we provide is absolutely guaranteed.
11. Please let us know if you do not want to receive any direct marketing from us.
12. You have the right to know what personal information we hold about you. If you would like to receive a copy, please complete a form called an 'Access Request Form' on [www.discovery.co.za](http://www.discovery.co.za) and specify the information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.
13. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
14. You have the right to ask us to update, correct or delete your personal information. Where we cannot delete your personal information, we will take all steps to make it anonymous. You agree that we may keep your personal information until you ask us to delete or destroy it. This is unless the law requires us to keep it. However, be advised that the withdrawal of your consent may result in us being unable to provide you with certain services and product offerings.
15. We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated regularly. To enable this, we will always try to get personal information from you directly. Where we are unable to do so, we will use verifiable, independent third-party data sources.
16. We are required to collect and keep personal information in terms of the following laws:
  - 16.1. The Electronic Communications and Transactions Act (ECT)
  - 16.2. The Consumer Protection Act (CPA)
17. You agree that we may transfer your personal information outside South Africa:
  - 17.1. If you give us an email address that is hosted outside South Africa
  - 17.2. To administer certain services, for example, cloud services.

17.3. We will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

18. We may unilaterally change this privacy statement at any time. The most updated version will be always be available on [www.discovery.co.za](http://www.discovery.co.za). It is your responsibility to check our website regularly to ensure that you are aware of these changes. By continuing to be a member or policyholder, you agree that the latest version will apply to you.
19. If you believe that we have used your personal information contrary to this privacy statement, you must first attempt to resolve any concerns directly with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator under POPIA.

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