



# Privacy Policy

We believe you deserve the utmost respect when it comes to the security and use of your personal information, so we have described our Privacy Policy as clearly as possible in the summary below.

Our Privacy Policy applies to all current and former customers and may change from time to time. Please also read the loan terms and conditions (sent via email during the application), which provide further details of how we collect, process and use your personal information and should be read together with this Privacy Policy.

## **Your consent**

By submitting your details and/or using our service you accept this Privacy Policy and expressly consent to the use and disclosure of your personal information in the manner described below. If you object to any of the potential uses described in this Privacy Policy please don't register to apply for a loan.

## **Security and Confidentiality**

We understand the value of your personal information and therefore will take all reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. Your personal information is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of that information.

We recognise the need for appropriate protection and management of the personal information you share with us. We protect that information using secure socket layer (SSL) encryption technology and by limiting employee access on a need-to-know basis. We store data in encrypted form on servers and control access via secure web pages. We employ firewalls and other security technologies to protect our servers from external attack.

Our security systems meet or exceed industry standards and we are constantly monitoring technological developments to ensure our systems evolve as required. We also test our systems regularly to make sure our security mechanisms are up to date.

Finally, we are subject to South African data protection laws, which we comply with fully and give the greatest respect.

## **Personal Information**

Personal information is information that identifies or relates specifically to you includes your financial information, for example, your name, age and identity number, your assets and



liabilities, your income and your payment records. In short, any information that we know about you will be regarded as your personal information.

## **Collecting your data**

We collect information about you in two ways - directly from your application and also from outside sources such as credit bureaux and customer service providers. We may use data that identifies your personal information for a number of things including: statistical analysis; to develop and improve our products; to assess lending risks; to update your records; to identify which of our products, or our partners' products which might interest you; to identify and prevent fraud, money laundering and other criminal activities; to carry out regulatory checks, keeping you informed about your loan, and for market research; and in the products and services which we offer on behalf of third parties.

## **Collection and Use of Personal Information**

In order to make your use of this loan product and service as successful as possible, it is necessary for us to find out exactly what you need and want from us and to ascertain whether in terms of the provisions of the National Credit Act you are eligible to get a loan. The following are some of the reasons why we would collect your personal information:

- to identify you;
- in order for us to process your instructions or requests;
- in order for us to ensure that you meet our lending criteria, we may collect and analyse your personal information and combine all the information that we have about you to compile a credit profile of you in order for us to grant you a loan and to meet your specific needs;
- once we have collected and analysed your personal information, we may send you promotional material or details which we think may be of interest to you. If any of this promotional information relates to products, promotions, news or services of a third party, and if you indicate that you would like more details, we may inform the third party to contact you directly. We will however, only inform a third party to contact you directly if you have indicated that this is agreeable to you.

In addition, we utilise your personal information for the other purposes set out in this Privacy Policy.

## **Additional data collection**

In addition to the personal information you submit, we may collect information about your computer or mobile device including, where available, your IP address, operating system and browser type - for system administration and to report aggregate information to our advertising partners which allow Us to have a better understanding of Our customer requirements and/or preferences by using cookies to track users as they travel from website to website recording what commercial advertisements they view and select while browsing.



This is statistical data about browsing actions and patterns and does not identify any individual. We may also obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer or mobile device. Cookies enable us to improve our service to you, estimate our audience size and usage patterns, store information about your preferences and recognise you when you return to our site.

You can set your web or mobile browser to refuse cookies, but if you do this you may not be able to enjoy full use of the site and you may not be able to take advantage of certain promotions we may run from time to time. Please note that third parties who advertise on our site may also use cookies, but we do not have access to, or control over them and therefore cannot take responsibility for them.

We want to provide you with the best possible service, so calls will be recorded and/or monitored for quality checks and staff training. Recordings may also be used to help us combat fraud.

## **"PIN"**

When you use the this Website or mobile application and the services provided by us, you may be given an access number, user name, password and/or personal identification number (PIN). You are responsible for maintaining the secrecy and confidentiality of your user name, access card, password and/or personal identification number ("PIN").

## **Sharing your data for service provision**

We share the data you submit with third parties involved in the process of providing the services you request, such as lenders, credit bureaus, customer service providers and collection agencies. We have trusted relationships with these carefully selected third parties who perform services on our behalf. All service providers are bound by contract to maintain the confidentiality and security of your personal information and are restricted in their use thereof as per this Privacy Policy.

## **Selling and disclosing your data to third parties**

We may also sell your data (or otherwise pass it on) to selected third parties who may receive it as part of products or services which we offer and/or otherwise use it to contact you by post, telephone, email, SMS or other reasonable method in relation to offers they feel might interest you, whether or not we enter into an agreement with you.

By clicking the "I Accept" box, you hereby agree that we may disclose your personal information:



- In the event we sell or buy any business or assets (in which case we may disclose your personal information to the prospective seller or buyer of such a business or assets)
- If our business or substantially all of its assets are acquired by a third party (in which case personal information held about customers will be one of the transferred assets)
  
- If we have a duty to disclose your personal information in order to comply with a legal request, or in order to enforce any of our terms and conditions

## **Foreign Parties**

Because we work with some carefully selected partners outside of South Africa - in order to offer you our loans service - we may also need to transfer your personal information abroad, to countries whose data protection laws are less strict than in South Africa. If and whenever this is the case, we will ensure the information is held securely to standards as least as good as those in South Africa and is only used for the purposes set out in this policy.

## **Electronic Communications and Transactions Act**

We also voluntarily subscribe to the principles, outlined in Section 51 of the Electronic Communications and Transactions Act 2002 ('ECT Act'), which govern your right to having your personal information kept private. We briefly outline these principles below:

- We will only collect, collate, process and store ('use') your personal information with your permission as set out in this Privacy Policy, unless legally required to do so, and will only use such information for the lawful purpose for which it is required as set out in this Privacy Policy.
- We hereby disclose in writing, the specific purpose for which we use, request and store your personal information. We will also keep a record of that personal information and the specific purpose for which we have used it.
- We will not use your personal information for any purpose, other than that which we disclosed to you herein, unless you give us your express written permission to do so, or unless we are permitted/required to do so by law.

Further to the requirements of the ECT Act; we will disclose your personal information without your consent:

- If we are required to do so by law or a court order;
- If disclosure is in the public interest;
- If disclosure is in the this company's interest;
- With your implied consent.



In terms of the Consumer Protection Act and section 45 of the ECT Act, you understand that you have the option to opt out of any mailing list for commercial and marketing communications.

### **Contact from Us and third parties**

As part of the application process, we ask you whether we or any of our partners may contact you about our products and services by telephone, post, email and SMS (or other reasonable method). If you ticked "yes" but no longer wish to receive such communications, please visit

the My Account page on our website, login and change your communication preference at any time, or follow the instructions in the message itself.

We may transfer your personal information to selected third parties (see “Selling and disclosing your data to third parties” above). If at any time you wish to stop receiving such contact from a third party, you will need to follow the instructions about unsubscribing provided at that time by the third party. Please note that we only partner with trusted companies who will respect your right to unsubscribe from any such marketing communications, but we will not be responsible for managing that process or any disputes.

### **Third party links**

Our site may contain links to third party websites. If you follow a link to any of these websites, please note that these sites have their own terms and privacy policies and that we do not accept any responsibility or liability for them. By registering you may receive follow-up contact and offers from third party companies as you have agreed to do by accepting this Privacy Policy and, while we only work with selected partners, we are not responsible for the services or representations of third parties.

Because we are not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to this website or websites facilitated by us), we do not exercise control over third parties' privacy policies and you should refer to the privacy policy of any such third party to see how such party protects your privacy.

### **Age**

To register with us you must be 18-years of age or older. Minors are strictly forbidden from using the service.

### **Changes to this Privacy Policy**



We reserve the right, in our sole discretion to update, modify or amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time with or without notice. You therefore agree to review the Privacy Policy whenever you visit this Website for any such change. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

### **Which laws apply?**

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Privacy Policy, we both submit to the jurisdiction of the South African courts.