



FEDGROUP PRIVACY POLICY

**THIS POLICY APPLIES TO FEDGROUP FINANCIAL HOLDINGS (PTY) LTD
REGISTRATION NUMBER: 1990/004872/07 AND ITS SUBSIDIARIES:**

(HEREINAFTER "FEDGROUP")

**WE RESPECT YOUR PRIVACY. THIS IS A SUMMARY OF OUR PRIVACY POLICY AND CONTAIN THE
MOST IMPORTANT AND RELEVANT POINTS FOR YOU. PLEASE READ THE FULL PRIVACY POLICY
BECAUSE IT APPLIES TO YOU.**

MARCH 2021 | VERSION 02

INTRODUCTION

Welcome to our privacy policy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person.

The purpose of this policy is to describe the way that we handle your personal information.

This policy applies to you if you are:

- a visitor to our website;
- use our mobile App; or
- a customer who has ordered or requested the products or services that we provide.

YOUR RIGHTS UNDER THIS PRIVACY POLICY

You have the right to have your personal information processed lawfully. Your rights include the right:

- to be notified that your personal information is being collected or that your personal information has been accessed or acquired by an unauthorised person e.g. where a hacker may have compromised our computer system;
- to find out whether we hold your personal information and to request access to your personal information;
- to request us, where necessary, to correct, destroy or delete your personal information;
- to object, on reasonable grounds, to the processing of your personal information;
- to object to the processing of your personal information for purposes of direct marketing, including by way of unsolicited communications;
- to submit a complaint to the Regulator if you believe that there has been interference with the protection of your personal information, or if you believe that an independent adjudicator who may be resolving your complaint against us, has not decided the matter correctly; and
- to institute civil proceedings against us if you believe that we have interfered with the protection of your personal information.

PERSONAL INFORMATION

Personal information includes:

- certain information that we collect automatically when you visit our website or mobile App;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate, or cannot be traced back, to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).
- We will not intentionally collect and process the personal information of a child unless we have the permission of a competent or authorised person.
- Personal information includes information we collect (i) automatically when you visit our website or use our mobile App, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

COMMON EXAMPLES

Common examples of the types of personal information which we may collect and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind;
- contact information – such as your phone number or email address;
- address information – such as your physical or postal address; or
- demographic information – such as your gender or marital status.

SENSITIVE PERSONAL INFORMATION

Depending on the products or services that you require, we may also collect sensitive personal information including your:

- financial information – such as your bank account details;
- sensitive demographic information – such as your race or ethnicity;
- medical information – such as information about your physical or mental health;
- criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- employment information – including your membership of a trade union; and

ACCEPTANCE

It is important that you read, understand and accept our Terms of Service if you would like to use our services. You must accept all the terms of this policy when you order our products or request our services. If you do not agree with anything in this policy, then you may not order our products or request our services.

You may not order our products or request our services if you do not accept this policy.

LEGAL CAPACITY

You may not access our website or mobile App or order our products or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

DEEMED ACCEPTANCE

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

YOUR OBLIGATIONS

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

CHANGES

We may change the terms of this policy at any time by updating this web page. Please ensure that you visit our website and regularly read this Privacy Policy. Although we do not promise to do so, we may give you notice of any changes we think are important.

If you do not agree with the changes, then you must stop using the website or mobile App and our products or services. If you continue to use the website, mobile App or our products or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

COLLECTION

On registration

We collect certain information on registration when you register on our website or mobile App. Once you register on our website or mobile App, you will no longer be anonymous to us. You will provide us with certain personal information when you register.

This personal information will include:

- your name and surname;
- your identity number;
- your email address;
- your telephone number;
- your company name, company registration number, and VAT number;
- your postal address or street address; and
- your username and password.

We will use this personal information to fulfill your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

ON ORDER OR REQUEST

We collect certain information when you order our products or request our services from us. When you order our products or request our services from us, you may be asked to provide us with additional information on a voluntary basis (products or services information).

COOKIES

We may collect certain information from your web browser, including your Internet usage information when you visit our website. We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device.

These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about this in our Cookie Policy.

OPTIONAL DETAILS

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or mobile App or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional products or services, or otherwise use the optional features and functionality available.

RECORDING CALLS

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

PURPOSE FOR COLLECTION

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

We may use or process any products or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- products or services purposes – such as collecting applications or requests for and providing our products or services;
 - marketing purposes – such as pursuing lawful related marketing activities;
 - business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
 - legal purposes – such as handling claims, complying with regulations, or pursuing good governance.
- We may use your usage information for the purposes described above and to:
- remember your information so that you will not have to re-enter it during your visit or the next time you access the website or mobile App;
 - monitor website and mobile App usage metrics such as total number of visitors and pages accessed; and
 - track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website or mobile App.

CONSENT TO COLLECTION

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

USE

Our obligations

We may use your information to send you administrative messages and email updates to you regarding the website or mobile App and for marketing purposes where lawful.

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the products and services you subscribe to. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages and unsubscribe from email updates. We will not send you promotional messages unless you have chosen to opt-into them.

DISCLOSURE

Sharing

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their products or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our products or services providers under contract who help provide certain products or services or help with parts of our business operations, including underwriting, fraud prevention, bill collection, marketing, technology services (our contracts dictate that these products or services providers only use your information in connection with the products or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information (where applicable), as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.
- We will ensure that your personal information is processed in a lawful manner and that the third parties or we do not infringe your privacy rights. In the event that we ever outsource the processing of your personal information to a third party operator, we will ensure that the operator processes and protects your personal information using reasonable technical and organisational measures that are equal to or better than ours.

REGULATORS

We may disclose your personal information as required by law or governmental audit.

We may disclose personal information to third parties if required for legal reasons.

LAW ENFORCEMENT

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

NO SELLING

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

MARKETING PURPOSES

We may disclose aggregate statistics (information about the customer population in general terms) to service providers or business partners.

EMPLOYEES

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

SECURITY

Our website and services are hosted on a secure server and uses security measures to prevent interference by intruders. We take the security of personal information very seriously and always do our best to comply with applicable data protection laws and to secure the integrity and confidentiality of your personal information in our possession or under our control. We will do this by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of your personal information; and unlawful access to or processing of your personal information. Our hosting company hosts our website and servers in a secure environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

UPDATING AND ACCURACY

Please keep your personal information accurate and up to date by accessing your account online, emailing us, by phoning us. We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website, mobile App or through other channels. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

RETENTION

We will only retain your personal information for as long as is necessary.

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

TRANSFER TO ANOTHER COUNTRY

We will not transfer any personal information across a country border without your prior written consent.

We may not transfer your personal information outside the country in which it was collected to a foreign country without your permission.

UPDATING OR REMOVING

You may choose to correct or update the personal information you have submitted to us, by completing a Request for Correction or Deletion of Personal Information form in the relevant menu in the pages on our website or contacting us by phone or email.

You may choose to update or remove the personal information you have submitted to us.

LIMITATION

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

ENQUIRIES

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us @ info@fedgroup.co.za.