POPIA POLICY

1. INTRODUCTION

This is the Protection of Personal Information Policy, in terms of the Protection of Personal Information Act No. 4 of 2013 (POPIA) for the VeriCred Group of Affiliated Companies (VGAC). While not all the Companies forming part of VGAC are processing Personal Information, for the sake of compliance and inclusion, this Policy will be applicable to all.

This policy explains how VGAC collects, shares and protects your Personal Information, what your rights are and how you may lodge a complaint as required by the Protection of Personal Information Act ("POPIA").

2. DEFINITIONS

"VGAC" means, without limiting the generality of it, VeriCred Group of Affiliated Companies and include; VeriCred Group Holdings (Pty) Ltd, VeriCred Admin Holdings (Pty) Ltd, VeriCred Credit Management Services (Pty) Ltd, VeriCred Collections (Pty) Ltd, FunaCred (Pty) Ltd, AfriCred Collections (Pty)Ltd.;

"Client" means a natural or juristic person who contractually mandated VGAC to assist with the collection of outstanding debts or any of the related Services offered by VGAC;

"Consent" means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;

"Consumer" means a natural or juristic person who was handed over for the collection of outstanding debt and includes a Consumer as defined by the Consumer Protection Act no 68 of 2008 and the National Credit Act no 34 of 2005;

"Data subject" means a natural of juristic person to whom the Personal Information relates;

"Interactive Applications" means any device, technology, software application, or communication instrument VGAC use to interact with a Client or a Consumer

"Operator" means a person who processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party;

"Personal Information" means Personal Information as defined in POPIA Section 1;

"POPIA" means the Protection of Personal Information Act No. 4 of 2013;

"Process, Processed, Processing" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including the collection,

RM

receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form or merging, linking, as well as restriction, degradation, erasure or destruction of information;

"Responsible party" means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information;

"Special Personal Information" means Personal Information as referred to in Section 26;

"This website" means www.vericred.co.za and/or www.vericredonline.com;

"User" means any person accessing any part of this website.

3. PURPOSE OF THIS POLICY

At VGAC we respect your privacy and take the protection of Personal Information 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. When we refer to "your" we include the aforesaid natural or juristic persons (data subjects).

4. APPLICATION AND SCOPE

This policy applies to:

- All Personal Information that we process including personal and special information you give to us or which we may collect from third-parties or was provided to VGAC by our Clients;
- Any visitor or User to our website;
- Any Consumer interacting with VGAC;
- Any Client of VGAC who has requested any of the services that VGAC provide;
- All Employees, Directors, Consultants and part time Employees of VGAC;

5. PROCESSING OF PERSONAL INFORMATION

In terms of Section 11 of POPIA, Personal Information may only be processed if:

RM

(a) the data subject or a competent person where the data subject is a child consents to the processing;

(b) processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;

(c) processing complies with an obligation imposed by law on the Responsible Party;

(d) processing protects a legitimate interest of the data subject;

(e) processing is necessary for the proper performance of a public law duty by a public body; or

(f) processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom the information is supplied.

VGAC will at all times process Personal Information in accordance and in compliance with Section 11 of POPIA.

6. COLLECTION OF PERSONAL INFORMATION

VGAC may collect or obtain Personal Information from or about you, the Data Subject, in the following manner:

You may provide Personal Information to us either directly or indirectly (via third parties) when using our products and/or services in the following ways:

- When you register for any of our services or products that we provide;
- When you provide any information to us online, telephonically, through interactive applications, or through any other communication channel;
- Through our Clients or service providers who provides your information to us;
- In the course of VGAC providing any of our services to you;
- When you visit VGAC or interact with VGAC's Website or various other platforms;
- When we request your Personal Information when so required by Legislation to collect such information;
- When VGAC acts as Debt Collector and as an Agent in terms of the Debt Collectors Act No 114 of 1998, on behalf of our Clients for pursuing the legitimate interests of the Responsible Party (our Client) or of a third party to whom the information is supplied;
- We may also collect your Personal Information from our group entities and its partners, credit providers, service providers or other third-parties that may hold such information.

RM

7. HOW WE USE YOUR PERSONAL INFORMATION

We may use or process any Personal Information that you provide to us or was provided to us as set out in this Policy, to enable and facilitate the collection of defaulted accounts handed over to VGAC for collection. Processing includes gathering Personal Information, disclosing it, and combining it with other Personal Information. We generally collect, receive and process Personal Information for various purposes, including:

- **services purposes –** such as providing our services;
- **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 pursuing claims, complying with regulations, or pursuing good governance.

We may use or transfer, share and/or disclose your Personal Information for purposes of:

- 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;
- Recording and monitoring your telephone calls and electronic communications to and with VGAC in order to process your or our Clients instructions and requests;
- Call record in terms of a contractual requirement with Banks.
- To manage and create data analytics and models;
- Providing you with the services, products or offerings you have requested, and keeping you informed;
- Disclosing your Personal Information to third-parties for reasons set out in this Policy or where it is not unlawful to do so;
- Enhancing the accuracy and quality of our data;
- Dealing with complaints and requests from Regulators and our Clients;
- Managing your account or contract/relationship with VGAC;
- Complying with applicable laws, including lawful requests for information received from law enforcement, government and tax collection agencies;
- Detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- To monitor website usage metrics such as total number of visitors and pages accessed; and
- To track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

RM

8. DISCLOSURE TO THIRD PARTIES

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;
- If we make use of third-party service providers to provide products or services to you or to provide products or services on our behalf, we will regulate these relationships contractually to ensure that they process your Personal Information according to the law;
- Credit Bureaus and Regulators, including fraud agencies, to report account information, as permitted by law;
- Banks and banking partners as required by law or 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);
- Other third parties who provide VGAC with relevant services where appropriate;
- Employees that require Personal Information to fulfil their employee duties.

9. HOW WE COLLECT YOUR PERSONAL INFORMATION

Ways in which Personal Information will be collected in terms of POPIA are as follows:

- Personal Information that we collect automatically when you visit our website, including cookies;
- Personal Information collected on registration with VGAC or through any Interactive Applications or when visiting our Offices;
- Personal Information provided directly to VGAC by our Clients or subcontractors in terms of valid contract to provide Services for pursuing the legitimate interests of the Responsible Party (our Client).
- Personal Information provided to VGAC when applying for or contracting for our Services;
- Personal Information that you provide to us voluntarily either via email or in any correspondence or any form of communication with VGAC;
- Personal Information provided to VGAC on request to a registered Credit bureau.

RM

The following Information is excluded from protection under POPIA includes:

- Personal Information that has been made anonymous so that it does not identify a specific person;
- Personal Information permanently deidentified that does not relate or cannot be traced back to you specifically;
- Non-personal statistical information collected and compiled by us; and
- Personal Information that you have provided voluntarily in any form of communication with VGAC, and in an open, public environment or forum including any blog, chat room, community, social media, 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).

10. CONSENT and ACCEPTANCE

Acceptance required

You must accept all the terms of this policy when you interact with VGAC or when you request our services. If you do not agree with the contents of this Policy, then you may not interact with VGAC or request our services.

Legal capacity

You may not access our website or order our goods 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 the terms of this Policy.

Your obligations

You may only provide VGAC with your own Personal Information. Where you provide the Personal Information of another data subject you warrant that you are legally permitted to do so and have obtained the necessary consent.

RM

Consent

Consent for the processing of your Personal Information is deemed to be given by you in respect of all the Personal Information you provide and make available in any form of communication with VGAC as provided for and as expressed in this Policy.

11. CATEGORIES OF PERSONAL INFORMATION WE MAY PROCESS

VGAC will process Personal Information only to the extent needed to perform its functions and in terms of POPIA. The following are categories of Personal Information we may collect.

- Demographic information such as gender, date of birth/age, nationality, salutation, title, or language preferences.

- Identifier Information such as your name, passport or Identity number, utility provider details, bank statement or other financial information.

- Contact details such as correspondence address, telephone or cellphone number, email address and/or details of public social media profile(s).

- Personal Information as evident from and as provided to VGAC in any correspondence and/or communication with VGAC.

- Payment details such as billing address, payment method, bank account number or Credit Card, invoice records, payment records, SWIFT details, payment amounts, payments dates and/or other relevant financial information.

- Data relating to visits to VGAC websites or any electronic communication with VGAC (including email, WhatsApp, interactive applications or similar communication applications), device type, operating system, browser type and settings, IP address, language and location settings, dates and times connecting and/or any technical communication information.
- We may automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, color capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the

RM

website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place Personal Information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some Personal Information.

- Cookies which are small pieces of information sent to the user's browser and stored on the user's hard drive. Temporary or session cookies expire and are deleted when the browser is closed. Cookies by themselves cannot be used to personally identify users. If necessary, users can alter the manner in which their browser handles cookies. We may place 'cookies' on your device when you visit our websites.

- Employer details such as name, address, capacity or designation, telephone number, and/or email address.

- Any and/or all Credit Information in a Credit Report as prescribed in terms of the National Credit Act No 34 of 2005 as provided by any registered Credit Bureau.

12. LAWFULL PROCESSING OF PERSONAL INFORMATION

POPIA prescribe the following conditions for the lawful processing of Personal Information by a Responsible Party:
"Accountability", as referred to in section 8;
"Processing limitation", as referred to in sections 9 to 12;
"Purpose specification", as referred to in sections 13 and 14;
"Further processing limitation", as referred to in section 15;
"Information quality", as referred to in section 16;
"Openness", as referred to in sections 17 and 18;
"Security safeguards", as referred to in sections 19 to 22; and
"Data subject participation", as referred to in sections 23 to 25.

Accountability (Section 8)

Section 8 of POPIA states that the Responsible Party must ensure that the conditions set out in this Chapter, and all the measures that give effect to such conditions, are complied with at

RM

the time of the determination of the purpose and means of the processing and during the processing itself.

VGAC, in the majority of its operations, acts as Operator who processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party.

It is ultimately the Responsible Party who is accountable to the Information Regulator (South Africa's data protection authority) and to Data Subjects. Furthermore, the Responsible Party is liable for ensuring that personal data is processed lawfully. The operator follows the instructions of the Responsible Party by virtue of written contract or mandate which may take the form of an operator agreement and/or data processing agreement, which can either be concluded as a separate agreement or incorporated into an existing service level agreement.

The resultant position of this is, that in the event of any breach of POPIA or complaint being lodged by a Data Subject, it is the Responsible Party who, in terms of POPIA, remains responsible for managing and/or reporting the incident and/or complaint and not the Operator. Any obligations ascribed to the Operator, or right of recourse the Responsible Party may have, in the event the Operator is to blame, will be determined in terms of the contract between the parties wherein the Operator's duties, obligations and any indemnification are defined. VGAC can therefore be kept contractually liable for any breaches of the POPIA by our clients.

Where VGAC act as a Responsible Party it will ensure that the conditions set out in this Chapter, and all the measures that give effect to such conditions, are complied with at the time of the determination of the purpose, means of the processing and during the processing itself.

<u>Processing limitation (sections 9 to 12)</u>

Personal information must be processed lawfully and in a reasonable manner that does not infringe the privacy of the data subject and must be collected directly from the data subject, except as otherwise provided for in subsection (2).

Subsection (2) provides that it is not necessary to comply with subsection (1) if—

(a) the information is contained in or derived from a public record or has deliberately been made public by the data subject;

RM

(b) the data subject or a competent person where the data subject is a child has consented to the collection of the information from another source;

(c) collection of the information from another source would not prejudice a legitimate interest of the data subject;

(d) collection of the information from another source is necessary—

  (i) to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution, and punishment of offences;

  (ii) to comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue as defined in section 1 of the South African Revenue Service Act, 1997 (Act No. 34 of 1997);

  (iii) for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;

  (iv) in the interests of national security; or

  (v) to maintain the legitimate interests of the Responsible Party or of a third party to whom the information is supplied;

(e) compliance would prejudice a lawful purpose of the collection; or

(f) compliance is not reasonably practicable in the circumstances of the particular case.

VGAC, in processing Personal Information, in the majority of instances, acts as a Debt Collection Agent and an Operator for our Clients. Our Clients collect the Personal Information directly from their Consumers in a lawful manner and provide VGAC with the Personal Information of their consumers to enforce their contracts with their consumers. Our Clients have a right of recovery, and VGAC is contractually mandated to assist our Clients as they have a legitimate interest as the Responsible Party to whom the information is supplied. VGAC therefore does not need consent or does not collect the Personal Information directly from the Data Subject.

Where VGAC acts as a Responsible Party Personal information will be processed lawfully and in a reasonable manner that does not infringe the privacy of the data subject and will be collected directly from the data subject or as provided for otherwise in POPIA.

RM

Purpose specification (sections 13 and 14)

Section 13 of POPIA provides that Personal Information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party. Furthermore, those steps must be taken in accordance with section 18 (1) to ensure that the data subject is aware of the purpose of the collection of the information unless the provisions of section 18 (4) are applicable.

In instances where VGAC acts as an Operator, VGAC is contractually mandated to assist our Clients as they have a legitimate interest as the Responsible Party to whom the information is supplied. Our Clients collects the Personal Information for a specific and defined lawful purpose and the Data Subject is aware of the purpose of the collection of the information.

Where VGAC is deemed to be a Responsible Party to the collection of Personal Information, it will collect for a specific, explicitly defined and lawful purpose related to a function or activity of VGAC, unless the exceptions as provided for in Section 18(4) is applicable.

Retention and Restriction of Records (section 14)

VGAC will not retain Personal Information any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless—

- retention of the record is required or authorised by law;
- the Responsible Party reasonably requires the record for lawful purposes related to its functions or activities;
- retention of the record is required by a contract between the parties thereto; or
- the data subject or a competent person where the data subject is a child has consented to the retention of the record.

Further processing limitation (section 15)

Personal Information may not be processed for a secondary purpose unless that processing is in accordance or compatible with the purpose for which it was collected in terms of section 13.

In the instance of a valid credit agreement entered into in terms of the National Credit Act with a Creditor, debt collection (and all necessary ancillary actions thereto) on accounts handed

RM

over to VGAC by our Clients, is in accordance or compatible with the purpose for which it was collected and no further consent from a Data Subject is needed for VGAC to further process that Personal Information. With incidental credit agreements it remains the responsibility of our Clients (as the Responsible Party) to ensure that consent for further processing has been obtained (if needed).

"Information quality" (section 16)

Section 16 provides that a Responsible Party must take reasonably practicable steps to ensure that the Personal Information is complete, accurate, not misleading and updated where necessary.

Where the Data Subject provides information directly to VGAC, the Data Subject will be requested to warrant and confirm that the information provided is complete, accurate, not misleading and will request and inform the Data Subject that should any information changes, to update the Personal Information accordingly where necessary.

Where VGAC acts as the Operator, it is the obligation of the The Responsible Party to take reasonable steps to ensure that the Personal Information collected is complete, accurate, not misleading and updated where necessary.

Openness", (sections 17 and 18)

A Responsible Party must maintain the documentation of all processing operations under its responsibility.

When Personal Information is collected, the Responsible Party must take reasonably practicable steps to ensure that the data subject is:

- aware of the information being collected and where the information is not collected from the data subject, the source from which it is collected;
- the name and address of the Responsible Party;
- the purpose for which the information is being collected;
- whether or not the supply of the information by that data subject is voluntary or mandatory;
- the consequences of failure to provide the information;
- any particular law authorising or requiring the collection of the information;

RM

- the fact that, where applicable, the Responsible Party intends to transfer the information to a third country or international organisation and the level of protection afforded to the information by that third country or international organisation.

All the above is the Responsibility of the Responsible Party and not the Operator.

Security safeguards (Sections 19 to 22)

VGAC has several security safeguards in place and this policy must be read in conjunction with, *inter alia*, VGAC's Information Technology Security Policy and The Corporate Email Usage Policy.

In all instances where VGAC makes use of Third Party Services, the relevant Third Party enters into a Data Protection Agreement requiring compliance with this Policy and with POPIA.

Data subject participation (Sections 23 to 25)

Data subjects may request whether their Personal Information is held by VGAC, as well as requesting any correction and/or deletion of any Personal Information held about them in certain circumstances. These requests will also be forwarded to the relevant Client as they are the Responsible Party.

13. SECURITY

We take the security of Personal Information very seriously and always do our best to comply with applicable data protection laws.

VGAC have implemented reasonable technical and operational measures to keep your Personal Information secure

Access to Your Personal Information is limited to personnel who need access and appropriate security, and training is in place to avoid the unauthorised sharing of information to any unauthorised person.

RM

All our third-party suppliers must have signed a Data Protection Agreement with VGAC and have appropriate Data Protection and Security measures in place that will comply with our Privacy Policy and standards in the instance where we outsource any of our services.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information, we will notify you by contacting you on the contact details we have available on record, or by any other reasonably available method. In terms of POPIA, VGAC will report a data breach to the Information Regulator in the event VGAC is of the opinion that such breach falls within the definition of a reportable incident as per POPIA.

14. ACCURATE AND UP TO DATE

We will try to keep the Personal Information we collect, or which were provided to VGAC in terms of this Policy, as accurate, complete and up to date as is necessary for the purposes defined in this policy. It is your obligation to report any Personal Information which has changed or is deemed to be incorrect on your part.

15. TRANSFER OF PERSONAL INFORMATION

In the event when our business operations require as such, you agree that we may transfer your Personal Information cross border. Instances of transferring your Personal Information may include that we have decided to store information with a trusted third-party provider in another country or where a third party service provider makes use of storing services or processes across border.

We may transmit or transfer Personal Information outside of the country in which it was collected to a foreign country and process it in that country. Personal Information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting Personal Information may not be as stringent as the laws in the country in which it was collected. You hereby consent to the processing your Personal Information in a foreign country whose laws regarding processing of Personal Information may be less stringent.

RM

16. YOUR RIGHTS

You may request details of your own Personal Information which we hold about you under the Protection of Personal Information Act, 2013 ("POPIA"). Fees to obtain a copy or a description of Personal Information held about you are prescribed in terms of the Promotion of Access to Information Act, 2000 ("PAIA"). Confirmation of whether or not we hold Personal Information about you may be requested free of charge.

If you are a Client, you may choose to correct, update or remove the Personal Information you have submitted to us, by contacting the Information Officer by phone or email. Should you be a consumer, we will provide you with the relevant client's contact information and/or escalate the request accordingly. Please note that 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.

Should you require further information kindly contact us on legal@vericred.biz. If you would like to lodge a complaint with the Information Regulator, visit: https://www.justice.gov.za/inforeg/ for guidance.

17. DOCUMENT META DATA

Document version:	Version 19
Document approval authority:	Managing Director
Document approval date:	January 2025
Document approval signature:	Riandi Mare
Document owner:	Legal Advisor
Document author[s]:	C Labuschagne
Next review date:	01/2028
Visibility Requirements: - Circulation to staff via email. - Circulation by Branch Managers & Department Heads. - Store on Server. - Display on website	 ☐ ☐ ☐ ☐