# **Privacy Policy**

Welcome to The Kredo Mobility Company website

The Kredo Mobility Company strives to ensure that your privacy is protected. This Privacy Policy therefore regulates the manner in which we collect, use, process, disclose, transfer and retain your personal information.

We comply with the National Credit Act, 2005 (No.34 of 2005) ("NCA"), the Protection of Personal Information Act, 2013 (No. 4 of 2013) ("PoPIA") and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No.25 of 2002) which govern your right to having your personal information kept private of which these principles are covered in this Privacy Policy.

This Privacy Policy is incorporated into and is subject to The Kredo Mobility Company's Terms and Conditions as reflected on our websites (www.Kredo Mobility.co.za) ("The Kredo Mobility Company Site").

For the purpose of this Privacy Policy, "Consumer Credit Information" means consumer credit information as defined in Section 70 of the NCA; and "Personal Information" means personal information as defined in Section 1 of the PoPIA. You will be asked to provide your Personal Information when registering, accessing or using any Services (as defined under the Terms and Conditions). In this regard, we may collect a variety of information, including your:

- full name;
- telephone numbers:
- email address;
- SA ID number and/or Date of Birth;
- address details:
- income;
- expenses; or
- security questions relating to your Consumer Credit Information on your credit report and/or payment profile.

Internet Information. When you visit and use any Products or functions in The Kredo Mobility Company Site, we may collect the behavioural data and general internet data, including your internet protocol ("IP") address, metadata, location data, date and time you visit:

• A "cookie" is also set on your computer to allow us to recognize you whenever you visit and collect information, like the pages you visit and the preferences you choose. We use the information we collect for statistical purposes and to study how The Kredo Mobility Company Site is used so that we may improve and enhance your experience on The Kredo Mobility Company Site. We may provide such information collected to outside vendors located overseas for such purposes. No personal information is stored in cookies. It is possible for you not to accept our cookies while using The Kredo Mobility Company Site by setting the preference in your web browser. If you do so, you may not be able to

apply for credit reports online but you can still visit the pages in The Kredo Mobility Company Site.

One type of cookie is used so that The Kredo Mobility Company Site "recognizes" you each time you return using the same computer, and you do not have to re-enter all your personal information on each visit. You can set your web browser to refuse to accept this cookie, or delete this type of cookie from your hard drive, and still access our products and services, as long as you reenter information each time you visit. The second type of cookie is needed so that we can process each step of your transactions with us. If you refuse to accept this type of cookie, you will not be able to access our products and services. Most web browsers automatically delete this type of cookie when you terminate your session;

- We may use domestic or overseas third-party advertising companies to serve
  ads on The Kredo Mobility Company Site or on other sites which we use for
  advertising. These companies may employ cookies and action tags (also known
  as single pixel gifs or web beacons) to measure advertising effectiveness; and
  they are not authorized to use the information we share with them for any other
  purpose. Any information that these third parties collect via cookies and action
  tags is completely anonymous.
- We may use Google Analytics or other similar analytical tools to obtain information collected in order to display, optimize and personalize advertisements and customer experience on our web properties that are designed to bring visitors to The Kredo Mobility Company Site, to determine which advertisements you may find useful, and to personalize your experience on The Kredo Mobility Company Site and web properties. We may also use this information to segment, enhance or modify our advertisements and to personalize your experience; and/or
- Anonymous Data. In order to enhance the usefulness of The Kredo Mobility Company Site and our Services, The Kredo Mobility Company will collect data about our customers' use of The Kredo Mobility Company Site, in a manner that does not include any Personal Information. While you browse the The Kredo Mobility Company Site, we note which pages of The Kredo Mobility Company Site you visit and note the IP address of your computer (as all web sites do automatically), but we do not link that address information to your personal information, other than for purposes of authentication and protection of your personal information when you access the Site electronically. The general information we gather enables us to serve our customers better by continually enhancing The Kredo Mobility Company Site based on up-to-date use patterns. We are provided anonymous information collected from other web sites on which we display advertisements that enables us to understand how visitors to The Kredo Mobility Company Site, who were exposed to ads we have placed on those other web sites, interact with The Kredo Mobility Company Site. We may use this information to enhance or modify our campaigns that are designed to bring web visitors to The Kredo Mobility Company Site. You may opt-out of this anonymous data collection and sharing activity by visiting the Google Analytics Privacy Overview web page and following the procedures noted under the Browser Opt-Out and Privacy Center information sections.
- Behavioral Data. Behavioral data is the information which The Kredo Mobility Company will use to serve you with personalized offers of The Kredo Mobility

Company and our trusted partners. This data includes your interaction with our Products and Services in The Kredo Mobility Company Site, including but not limited to information searched, transaction conducted, purchase history etc. The information The Kredo Mobility Company gathers is for the purpose of enhancing the relevancy of the personalized offers. All these data will be kept in our secure server and no Personal Information will be transferred to any third parties. Marketing Data. The information we collect for our Digital Marketing business is segregated from Consumer Credit Information. Marketing Data may include information on consumers, households, and businesses as well as nonpersonal aggregated information and advertising program performance data. Marketing Data includes information about you, such as demographics, life events, public records, or firmographics. Demographic data includes information such as age, gender, income, occupation, education, and marital status. Life events data includes information such as a recent move or home purchase. Public records data includes information such as summarized census data, geographic data, and property data from local tax assessor and recorded deed information. Firmographic data includes information such as type of business, years in business, size of business, and job titles.

#### **Use and Disclosure of Personal Information**

The Kredo Mobility Company limits the use and disclosure of personal information to include only what is permitted and prescribed in terms of the NCA, PoPIA or any other applicable laws or in instances where consumers have consented to such collection, use and disclosure.

Confidentiality of your Personal Information is important to us. Unless we have your consent or permitted under the national laws, we will not sell, rent or lease your Personal Information to others. We will not use or share your Personal Information in ways unrelated to the circumstances described in this Privacy Policy.

Unless permitted by the laws or with your consent, we do not use any of your Personal Information concerning the religious, or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information.

#### Specifically, we use and disclose information in the following circumstances:

The following Consumer Credit Information is included in your credit report:

- Identifying information, such as: first name, surname, ID number, physical and postal address, contact numbers, marital status, spouse details, and current employer and occupation;
- Account History or Payment Profile: Your account history or payment profile is a 24 month record of all your accounts with credit or service providers and a history of how you pay these accounts on a monthly basis;
- Enquiries: a list of credit or service providers authorized by yourself or permitted in terms of the NCA to receive your credit report;
- Public Records: Information that is publically available as permitted by law such as judgments, administration orders, sequestrations, and rehabilitation;

- Default Data: a default is recorded on your credit profile when you fail to make the payment of money owed. default data is submitted by the credit or service providers to the credit bureaus: and
- Any other information that is permitted to be included under the NCA.

The Kredo Mobility Company may obtain indirect consent from consumers. Such consent is directly provided by consumers to The Kredo Mobility Company's data suppliers. The Kredo Mobility Company however takes all reasonable measures to ensure that all data suppliers are contractually bound to ensure that all legally required consents are obtained prior to accessing any Consumer Credit Information contained in our credit reports.

- With your consent, we may use your Personal Information to promote and market additional products, services and special offers from us and/or our affiliates that may be of interest to you. When you visit The Kredo Mobility Company Site, we may ask you if you want to sign-up to receive information and promotional offers and its marketing partners. If you provide your consent, we may share your Personal Information, e.g. name and email address, with one or more third parties in order to administer the programme and present such information or offers to you. If you do not register your ID Number, we will not collect any Personal Information on you while you visit The Kredo Mobility Company Site. In connection with the email registration program, our third party email processor may use action tags (also known as single pixel gif or web beacons) to collect completely anonymous information concerning your use of The Kredo Mobility Company Site. Such third party administrator is not authorized to use any such information for any other purpose. If you decide to register for emails, you may opt-out from receiving such communications, at any time. If you do not provide us your consent, some features in our The Kredo Mobility Company Website may not be available to you.
- To provide customer service to you, we may use your Personal Information:
  - to identify you. In order to process your transactions and provide you with quality customer service, we need your full name and current and/or billing address, your email address, mobile telephone number, (so we can contact and authenticate you) and, if you purchase one of our products or services, a valid credit card number or banking details, your identity card number, and certain other Personal Information and Consumer Credit Information, such as your date of birth, address information, employment information, and certain credit card and loan account information. We use such information to verify and authenticate the credit card number and to confirm that the person requesting your Personal Information or credit report really is you and not an impostor or other person improperly seeking to access your information;
  - where applicable, to create a user account (login user name and password);
  - to fulfil your requests for any information which you're entitled to request and access:
  - to provide service and support;
  - to help us develop, deliver, and improve our products, services, content, and advertising;

- to send important communications regarding any purchases or changes to the terms and conditions and or to advise you of any other important circumstances:
- for internal purposes such as auditing, data analysis, and research to improve The Kredo Mobility Company products, services, and customer communications; and
- for purposes of any The Kredo Mobility Company promotional competitions.
- We will use your Personal Information for the direct marketing purpose only if you give your consent to us or it is permitted by the laws.
  - You may sign up for our news by clicking the opt-in during the online ordering process by ticking the opt-in box that states,
  - I want to receive news and information on products to help me manage my debt better.
  - The Kredo Mobility Company will access, use, process and analyse your Personal Information provided by you, your Consumer Credit Information, Internet Information and Marketing Data to provide you personalized offers of The Kredo Mobility Company and our trusted partners.
  - In case you no longer want to receive these news or information, you may opt-out of receiving such by responding to the newsletter and asking to be unsubscribed, or calling our customer service department and asking to be taken off the list. If you signed up for our newsletter by selecting the special offers opt-in box during the ordering process, you may unsubscribe through the above two processes.
- Through The Kredo Mobility Company's Digital Marketing services, we enable our business partners to communicate with consumers in a digital environment. In an effort to provide relevant products and services to consumers, these businesses use our data and technology to create, deploy, and measure targeted advertising programs digitally. We collect information as outlined below and use it for permitted marketing uses. In addition, we may aggregate and depersonalize data for analytical purposes, to provide reporting to our business partners, and for measuring advertising performance. As a part of enabling Digital Marketing services, we may use service providers.
- We may only access, use and/or disclose your Personal Information without your consent in exceptional circumstances. These include circumstances where we believe such action is necessary to:
  - o comply with the law or legal process served on us;
  - comply with requests for information from police or government authorities;
  - protect and defend our rights or property (including the enforcement of our agreements);
  - o protect the public interest:
  - act in urgent circumstances to protect the personal safety of our employees or members of the public;
  - where applicable, with your implied consent; and
  - to the extent permitted or required in terms of the NCA, PoPIA and other relevant national legislation.
- Your participation in market research activities is optional. Should you choose to participate, we may use information you provide to improve your experience

with our products and services. We may engage third parties to assist us with our market research efforts who may retain non-personal aggregated information. However, all Personal Information you provide will only be used for our research purposes.

• When you submit an application for employment, we use your Personal Information for recruitment purposes only.

#### **Retention Of Your Information**

We retain your Personal Information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws and your consent to such purpose(s) remains valid after termination of our relationship with you.

Furthermore, we retain your Consumer Credit Information in our credit information database in accordance with the data retention periods prescribed by the NCA.

#### **Transfer of Personal Information Outside**

Unless permitted under the law or your consent is obtained, The Kredo Mobility Company will not transfer your Personal Information outside the Republic of South Africa.

## **Your Rights and Participation**

The Kredo Mobility Company aims to ensure that your Personal Information is accurately recorded. To be able to achieve this, we adhere to processes that help ensure and maintain data accuracy. We provide individuals with reasonable access to review and correct their Personal Information, as detailed in our website.

When gathering your Consumer Credit Information The Kredo Mobility Company works with our data suppliers to increase their awareness of the importance of providing only Consumer Credit Information that is accurate, complete, and up to date. The Kredo Mobility Company however, cannot alter the information reported by such data suppliers, unless the information is determined to be wrong, incomplete or inaccurate. If you do not agree with the accuracy of information The Kredo Mobility Company has on file, we have procedures in place to ensure that such information is verified, and where appropriate, amended or corrected. We however rely on you to bring any such information challenges to our attention.

Unless otherwise provided in any laws, you have the right to access, update, correct or object to processing your Personal Information. You may contact us via The Kredo Mobility Company Site.

You have the right to lodge a complaint to the Information Regulator:

- by e-mail: inforeg@justice.gov.za;
- to the following postal address: SALU Building, 316 Thabo Sehume Street, PRETORIA; or
- by telephone: 012 406 4818; or by Fax: 086 500 3351.

# **Security Of Your Information**

The Kredo Mobility Company takes security and the protection of Personal Information and Consumer Credit Information seriously. We maintain physical, technical and organizational safeguards to protect any data that we collect. We have adopted procedures to secure storage of Personal Information and are committed to working with our data suppliers to protect the security of Personal Information during any transfer to or from us. Moreover, we have also instituted a number of safeguards to identify and help prevent the fraudulent use of Consumer Credit information Furthermore, your Personal Information is only accessible to those The Kredo Mobility Company employee members, agents or contractors for business purposes and on a strictly need to know basis. For security purposes we then move all of the Personal Information that we collect or obtain about you, including your credit report, to an environment on our proprietary network that has controls in place to limit access to and secure the data maintained therein.

In The Kredo Mobility Company Site, we takes precautions to secure your Personal Information. If and when we ask you to provide your Personal Information, we will do so through a Web page that uses the industry standard secure transport protocol protocol. This protocol provides security for your information by encrypting it as it travels from your computer to our computer.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to or making alterations to data we maintain.

#### **Third Party Sites**

The Kredo Mobility Company Site may offer links to third party web sites including payment gateways for credit card payment. You should be aware that operators of linked web sites may also collect your Personal Information (including information generated through the use of cookies) when you link to their web sites. The Kredo Mobility Company is not responsible for how such parties collect, use or disclose your information and it is important for you to familiarize yourself with their privacy policies before providing them with your Personal Information.

## **Compliance and Enforcement Of this Privacy Policy**

Our compliance with this Privacy Policy will be monitored on a regular basis. The Kredo Mobility Company reserves the right to modify this Privacy Policy. The Privacy Policy posted at any time via The Kredo Mobility Company Site shall be deemed to be the Privacy Policy then in effect.

Consumers are welcome to contact The Kredo Mobility Company should they require more information or have any questions. Should you have any queries with our Privacy Policy or the manner in which your Personal Information is treated, we encourage you to direct any such queries or concerns to The Kredo Mobility Company. We will ensure you are contacted without delay in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Privacy Policy.

Last revised - June 2021

The Kredo Mobility Company