



INFORMATION PROCESSING POLICY

We are committed to protecting the privacy of the users of our web site and the services we offer here. We respect rights to personal information. For this reason, we have developed this policy to govern our processing of personal information. This document sets out:

- (a) How we collect personal information;
- (b) What types of personal information we collect and hold about;
- (c) The purposes for which we use such personal information;
- (d) Rights with respect to the personal information held by us.

Who we are

When we refer to “we”, “us” or “our” herein we are referring to Pay At Services (Pty) Ltd (Registration Number 2006/027951/07) and its affiliated group companies, or any of them, as the context requires, as well as our successors in title. Our principal place of business is at Ground Floor, Old College Building, 35 Church Street, Stellenbosch, 7600 but we recommend you contact us via telephone at +27 (0)21 886 5557 or electronic mail at info@payat.co.za.

Whose information we protect

When we refer to “you” or “your” herein we are referring to you, the users of our web site and of the services we may provide via our web site.

How we collect information

We collect information about you directly from you as well from third parties and publicly accessible sources in certain cases. The means and sources we use to collect information about you is as follows:

- (a) From you, when you make use of our website, enquire about or subscribe to our services or use our services, as well as when you subscribe to our newsletters or consent to receiving communications from us;
- (b) From public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) From our business partners and the persons employed by us to provide services for us, which may include debt collection services, communications services and data hosting, processing and management services;
- (d) From such persons or entities which may be legally entitled to provide us with information about you; and
- (e) From persons or entities which you may consent to providing us with information about you.

Information we hold about you

We record and hold the following types of information about you:

- (a) Details of when you contact us and when we contact you, including the IP addresses when you contact us via electronic mail or through our website, electronic mail addresses and telephone numbers you contact us from as well as the content of the communications between us, which we may record;
- (b) All information contained in the forms, requests or orders you submit to us, via electronic mail, our website or using any other means, including any information about your clients, the services or products you may have provided to them and any amounts owing to you in respect thereof;
- (c) Details about you which you provide to us to subscribe to or otherwise enable your use of our services, including your name, contact details, identity number and place of residence;
- (d) Information received pursuant to our enquiries with public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (e) Details of your preferences regarding our services and offerings, including which of our services you have made enquiries with us about.

We may hold your personal information for at least 5 years calculated from the date of collection, or for as long as you subscribe to any of our services and 5 years thereafter, as the case may be, subject thereto that in either case we shall not hold your personal information for a period which exceeds the maximum period permitted by applicable law.

The purposes for which we use your personal information

Certain of the information which we collect about you, as identified below, we need to use in order to process your requests for and instructions regarding our services and to exercise our rights under agreements we have with you. If we do not have the right to use such information it will not be possible for you to make use of our services or for us to process requests related thereto. Such information includes:

- (a) Your name, contact details, identity number and place of residence;
- (b) Your preferences regarding our services which you make use of or have made enquiries about;
- (c) Your bank account details and the client information and financial information which you submit to us in connection with our services;
- (d) The information about you which we have received from public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (e) The information which you and third parties have provided to us which we need to verify that the information which we have received from or about you are accurate, complete and up to date.

Other information about you which we hold and which we do not need for purposes of providing our services to you, and which we make use of based on your consent, will be used by us only for the purposes as agreed to by you. We may also use information we hold about you for purposes required by or as permitted under applicable law.

We collect and will process your information for the following purposes:

- (a) To process your application for our services and making related decisions, including by verifying your identity, credit status, contact details, financial track record and otherwise ascertaining that you qualify for our services from time to time;
- (b) To take such actions as may be required to enable and improve your use of our services and to exercise our rights and comply with our obligations in respect thereof, including by processing and recording your service requests, managing your accounts, communicating with you regarding your use of our services, communicating with your clients in connection with your service requests and collecting payments that your clients may owe to you and payments you may owe us;
- (c) To ensure that the information we receive and hold about you and your clients is accurate, complete and up to date;
- (d) To prevent, investigate and prosecute fraud, money laundering, terrorism, abuse of our services and other unlawful activities;
- (e) To comply with legal and regulatory requirements, for audit purposes and legal proceedings;
- (f) To conduct market research and business analysis, understand your preferences, learn more about the products and services that you are interested in and improve the products and services we offer to you;
- (g) To inform and provide you with the opportunity to make use of products, services and benefits that we offer and that we believe may be of interest to you to the extent that we are lawfully permitted to do so; and
- (h) For such other purposes as you may consent to or as may otherwise be lawfully permitted, including for the purposes of protecting our and/or your legitimate interests and/or that of our suppliers and other customers.

Please note that we will not contact you telephonically for unsolicited marketing purposes or send unsolicited marketing communications to you by facsimile, SMS or electronic mail if you have objected to receiving such communications by way of a public register recognised for such purposes by law or by notifying us of your objection in the prescribed manner. We will provide you with reasonable opportunities to object to receiving marketing communications in the manner prescribed by law, including upon application for our services and on each occasion when we send you such communications.

Sharing your information

Keeping your personal and financial information secure is one of our most important responsibilities. We cannot disclose your information unless legally permitted thereto. Save as set out below, we will not transfer your information to a third party without your consent unless legally obliged thereto. In particular, we do not sell lists or databases with our clients' information and will not provide any of your information to entities outside our group so as to permit them to market their products or services to you. You agree that we may transfer your information to the following people and organisations in pursuit of the data processing purposes to set out in this policy:

- (a) To all persons in our employ or in the employ of our affiliated companies, including to our directors, employees, contractors, agents, auditors, legal and other professional advisors and of our affiliated companies;
- (b) To credit bureaus and fraud prevention agencies, provided that we will notify you in advance before we provide adverse information about you to a credit bureau and, upon request, provide you with a copy of such information as required by law;
- (c) To governmental, judicial, regulatory and law enforcement bodies and agencies, including the South African Revenue Services and the National Credit Regulator;
- (d) To persons engaged by us at your request to provide services on your behalf, including for delivery of client invoices and payment collections;
- (e) To persons employed by us to provide services on our behalf that adhere to principles similar to ours regarding the treatment of your information, including delivery, debt collection, data hosting, processing and management services;
- (f) To any person to whom we cede, delegate, transfer or assign any of our rights or obligations pertaining to the services provided to you or contracts concluded with you;
- (g) To any person that acts as your legal guardian, executor of your estate, curator or in a similar capacity;
- (h) To such other persons as may be permitted by applicable law or that you may consent to.

Security

We will strive at all times to ensure that your records will always be protected against unauthorised or accidental access, processing or loss. We maintain this commitment to data security by implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we use a third party to host, manage or process your data on our behalf we will require that such third party also commit to implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we are not prevented by a law enforcement or regulatory agency, we will notify you without undue delay if we believe that unauthorised access to your information may have occurred, providing you with such information as you may reasonably require to implement protective measures.

Web Sites

When you visit our web site we may collect certain information about your usage preferences and history. Such information will be stored in a cookie on your computer's hard drive by your web browser. Cookies are intended to assist and improve your use of our web sites. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use all of the features of our site.

Every time you connect to our web sites we store web server logs which show your IP address (the unique number which your machine uses when it is connected to the Internet); what you looked at; whether the page request was successful or not, and which browser you used to view the pages. The use of this data is strictly for statistical and personalisation purposes only. This helps us understand which areas of the site are of particular interest and also which pages are not being requested. It also tells us how many hits and page requests we get.

Your rights regarding your information

Provided that you give us suitable and adequate proof of your identity, you have the right:

- (a) To know which records we hold about you;
- (b) If our right to process your personal information is based on your consent, to withdraw such consent at any time, provided that this shall not affect the lawfulness of processing which occurred prior to such withdrawal;
- (c) To object to the further collection, use, sharing or processing of your personal information by us at any time where such processing activities are not required by us to comply with our obligations under any agreement we have with you, to exercise our rights, or for such other purposes as may be required or permitted by applicable law; and
- (d) to require us to correct, erase or cease processing information or records we hold about you based on your consent, or that we are no longer permitted to retain, or which are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained;

Any of the above can be done by contacting us directly by any means provided by us, including by submitting a written request to us via email at info@payat.co.za. We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.