

October 2023

Dear Genesis Partner,

PROTECTION OF PERSONAL INFORMATION ACT, 2013 AND YOUR PERSONAL INFORMATION

1. Introduction

The Protection of Personal Information Act, 2013 ("POPI") came into complete commencement on 1 July 2021, in this regard we have a number of obligations and duties in terms of POPI that we must comply with. The protection of your personal information is a high priority for us and we have taken steps to ensure that your personal information is protected and remains private.

This letter explains all that is required in section 18 of POPI and will inform you of what personal information we collect, why we collect it, how we use it and what safety measures are in place to protect it.

Where **we** refer to "process", it means how **we** collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information. As a general rule **we** will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract.

Where we refer to 'personal information' we refer to any information that identifies **you** or specifically relates to **you**, or **your** employees stored or processed on the Product/s and/or Services. Personal information includes, but is not limited to, Marital status, National origin, Age, Language, Birth place, Education, Relevant financial history, Identifying number, E-mail address, physical address telephone number, Biometric information, Race, gender, sex, pregnancy status, ethnic origin, social origin, colour, sexual orientation, Physical health, mental health, well-being, disability, religion, belief, conscience, culture, Medical history, criminal history, employment history, Personal views, preferences and opinions, Another's views or opinions about you and full names and initials.

We may combine this personal information and use the combined personal information for any of the purposes stated in this letter.

If **you** use **our** services, goods, products and service channels **you** agree that **we** may process this personal information as explained in this letter. Sometimes **you** may provide **us** with consent to process this personal information.

If the Company processes personal information for another party under a contract or a mandate, the other party's Data Protection Policies and procedures will apply to the processing of such information.

The Company can change the processing procedures as set out herein from time to time if the law or **our** business practices requires such change.

2. What personal information do we collect?

We collect the following personal information about you:

- Name and Surname
- Identity Number
- E-mail address; physical address telephone number
- Marital status
- National origin
- Age
- Language
- Birth place
- Education
- Relevant financial history
- Biometric information
- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences and opinions
- Another's views or opinions about you

3. When and from where we obtain personal information about you

- **We** collect personal information from you directly.
- We collect personal information from a public record or if you have deliberately made the information public.
- **We** collect personal information from 3rd parties that are directly integrated with **our** software platform
- **We** collect information about **you** based on **your** use of **our** products, services or service channels.
- **We** collect information about **you** based on how **you** engage or interact with **us** such as via emails, letters, telephone calls and surveys
- We collect personal information from completed forms i.e. contact and billing information

The third parties from whom **we** collect **your** personal information are:

- **Our** partners, **your** employer, employees directly, any of **our** other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionaries, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Data Protection Policy;
- **your** spouse, dependents, partners, employer, and other similar sources;
- people **you** have authorised to share **your** personal information, like a person that makes a travel booking on **your** behalf or a medical practitioner for insurance purposes;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks and other persons that assist with the processing of **your** payment instructions, like EFT transaction partners.
- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- trustees, Executors or Curators appointed by a court of law;
- **our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**;
- courts of law or tribunals;

4. When will we process your personal information?

We will only process this personal information for lawful purposes relating to **our** business if the following applies:

- If **you** have consented thereto
- If a person legally authorised by **you**, the law or a court, has consented thereto
- If it is necessary to conclude or perform under a contract **we** have with **you**
- If the law requires or permits it
- If it is required to protect or pursue **your**, **our** or a third party's legitimate interest

5. Why we process your personal information?

We will process **your** personal information for the following reasons:

- to provide **you** with products, goods and services;
- to market **our** products, goods and services to **you**;
- to respond to **your** enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- to conduct market and behavioural research, including scoring and analysis to determine if **you** qualify for products and services or to determine **your** credit or insurance risk;
- to develop, test and improve products and services for **you**;
- for historical, statistical and research purposes, like market segmentation;
- to process payment instruments;
- to create, manufacture and print payment advice;
- to enable **us** to deliver goods, documents or notices to **you**;
- for security, identity verification and to check the accuracy of **your** personal information;
- to communicate with **you** and carry out **your** instructions and requests;
- for customer satisfaction surveys, promotional offerings.
- to enable you to take part in and make use of value-added products and services;
- to assess our lending and insurance risks; and / or

- for any other related purposes.

6. Is the supply of the personal voluntary or mandatory?

The supply of certain personal information is mandatory, meaning we have to collect this personal information from you by law. If you do not supply this information, we cannot comply with our legal obligations. In this regard, if you do not supply certain personal information we cannot do business with you.

In other instances the supply of personal information is voluntary, which means there is no law opposed on us to collect this personal information. Even though there is no law that imposes the collection of the personal information, we require the personal information to deliver the products and/or services to you.

7. Will we transfer your information to other countries?

We will transfer your personal information to a third party in a foreign country, upon your consent to do so. Your personal information will be afforded the same level of protection it enjoys in South Africa.

8. When, how and with whom will we share your personal information?

In general we will only share **your** personal information if any one or more of the following apply:

- If **you** have consented to this
- If it is necessary to conclude or perform under a contract **we** have with **you**
- If the law requires it; and / or
- If it's necessary to protect or pursue **your**, our or a third party's legitimate interests

We will share your personal information with the following persons, who have an obligation to keep **your** personal information secure and confidential:

- Other members of the Company, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Data Protection Policy
- **Our** employees as required by their employment conditions
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements
- Payment processing services providers, merchants, banks and other persons that assist with the processing of **your** payment instructions, like 3rd party EFT service providers
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime
- Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires **us** to share **your** personal information with
- **Our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**
- Persons to whom **we** have ceded our rights or delegated our obligations to under agreements, like where a business is sold
- Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- Trustees, Executors or Curators appointed by a court of law

9. What duties and rights do you have?

You have the right to request access to the personal information **we** have about **you** by contacting **us**. This includes requesting:

- Confirmation that we hold **your** personal information
- A copy or description of the record containing **your** personal information; and
- The identity or categories of third parties who have had access to **your** personal information

You must provide proof of identity when enforcing these rights.

You must inform **us** when **your** personal information changes.

We will attend to requests for access to personal information within a reasonable time. **You** may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. **We** will inform **you** of the fee before attending to **your** request.

Please note that the law may limit **your** right to access information.

You have the right to request **us** to correct or delete the personal information **we** have about **you** if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or **we** are no longer authorised to keep it. **You** must inform **us** of **your** request in writing. **We** may request documents from **you** to verify the change in personal information.

A specific agreement that **you** have entered into with **us** may determine how **you** must change **your** personal information provided at the time when **you** entered into the specific agreement. Please adhere to these requirements. If the law requires **us** to keep the personal information, it will not be deleted upon **your** request. The deletion of certain personal information may lead to the termination of **your** relationship with **us**.

You may object on reasonable grounds to the processing of **your** personal information.

We will not be able to give effect to **your** objection if the processing of **your** personal information was and is permitted by law; **you** have provided consent to the processing and **our** processing done according to **your** consent or the processing is necessary to conclude or perform under a contract with **you**.

You must inform **us** of any objection in writing.

Where **you** have provided **your** consent for the processing of **your** personal information, **you** may withdraw **your** consent. If **you** withdraw **your** consent **we** will explain the consequences to **you**. **We** may proceed to process **your** personal information even if **you** have withdrawn **your** consent if the law permits or requires it.

You have a right to file a complaint with **us** or any Regulator with jurisdiction about an alleged contravention of the protection of **your** personal information by us. **We** will address **your** complaint as far as possible.

The contact details for the Information Regulator is as follows:

| | |
|-------------------|--|
| Email: | Complaints.IR@justice.gov.za |
| Postal Address: | P.O. Box 31533, Braamfontein, Johannesburg, 2017 |
| Physical Address: | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001. |

10. How can you get in touch with us?

For any queries in relation to this letter or our processing of your persona information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

| | |
|-------------------|--|
| Name: | Jonathan Downha, - Information Officer |
| Contact Number: | +27 39 685 7010 |
| Email Address: | jono@genesishope.co.za |
| Physical Address: | Lot 17, Izotsha Road, Marburg, Port Shepstone, 4252 |

Kind regards,

Pieter de Bruin
Chairman of the Genesis Trust Board of Trustees