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WEBSITE PRIVACY POLICY

1. SCHEDULE		
1.1	The Organisation	FEENSTRA GROUP
1.2	Registration number	2010/010651/07
1.3	VAT registration number	4440263434
1.4	Physical address	MENLYN CORPORATE PARK, BLOCK C, 3 RD FLOOR, 175 COROBAY ROAD, WATERKLOOF GLEN X11, 0010
1.5	Email address	accounts6@feenstragroup.co.za
1.6	Website address	www.feenstragroup.co.za

2. COMMITMENT TO YOUR PRIVACY	
2.1.	Welcome to the Website set out in item 1.6 of the Schedule (" Website "), owned and operated by the Organisation set out in item 1.1 of the Schedule (" Organisation "). The Organisation is committed to protecting the privacy of the user of the Website. The Organisation values the trust of its subscribers and all others who work with it, and the Organisation recognises that maintaining your trust requires transparency and accountability in how the Organisation handles your Personal Information. This privacy policy (" Policy ") is incorporated into and is subject to the Organisation's standard terms and conditions and the general terms relating to the use of the Website.
2.2.	In performing the Organisation's services in the ordinary course of business, the Organisation may collect, use and disclose Personal Information. Anyone from whom the Organisation collects such information can expect that it will be appropriately and lawfully protected and that any use of or other dealing with this information is subject to consent, where this is required by law. This is in line with the general privacy practices of the Organisation.
2.3.	This Policy sets out how the Organisation collects, uses, stores, makes available, destroys, updates, discloses, and safeguards the Personal Information it processes in the course of its business.

3. DEFINITIONS	
3.1.	In this Policy, in addition to the other terms that have been defined in the body of the Policy, the Organisation makes use of the following terms:
3.1.1.	" Personal Information " means all information which may be considered to be personal in nature or information about an identifiable natural and / or existing juristic person (where applicable) in terms of the Electronic Communications and Transactions Act 25 of 2002 ("ECTA"), the Consumer Protection Act 68 of 2008 ("CPA") and the Protection of Personal Information Act 4 of 2013 ("POPIA"); and

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- 3.1.2. **“User, you, your or yourself”** refers to any person who makes use of the Website for any purposes whatsoever, whether or not such use is free of charge or paid for.
- 3.1.3. **“We, us or our”** refers to Our Company and any of its subsidiaries.
- 3.2. In addition, unless the contrary is specified, terms that are used in the Policy that are specifically defined in POPIA, are given the meanings ascribed to them in POPIA.

4. WHAT PERSONAL INFORMATION DOES THE ORGANISATION COLLECT, WHEN AND WHY?

- 4.1. The Organisation may collect Personal Information in conducting its ordinary business operations, including through the use of its Website. In processing such Personal Information, the Organisation at all times ensures that (i) it complies with the provisions of POPIA, and (ii) such Personal Information is used for legitimate business purposes.
- 4.2. We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- 4.3. Personal information includes, but is not limited to, the following information about you:
 - 4.3.1. your marital status (like married, single, divorced).
 - 4.3.2. your national origin.
 - 4.3.3. your age.
 - 4.3.4. your language; birth; education.
 - 4.3.5. your financial history (like your income, third party payments made on your behalf and the like)
 - 4.3.6. your identifying number (like an employee number, identity number or passport number).
 - 4.3.7. your e-mail address; physical address (like residential address, work address or your physical location); telephone number.
 - 4.3.8. your biometric information (like fingerprints, your signature or voice).
 - 4.3.9. your race; gender; sex; pregnancy; ethnic origin; social origin; colour; sexual orientation.
 - 4.3.10. your physical health; mental health; well-being; disability; religion; belief; conscience; culture.
 - 4.3.11. your medical history (like your HIV / AIDS status); criminal history; employment history.
 - 4.3.12. your personal views, preferences, and opinions.
 - 4.3.13. your confidential correspondence; and / or
 - 4.3.14. another’s views or opinions about you and your name also constitute your personal information.
 - 4.3.15. Personal information includes special personal information, as explained below.
- 4.4. We will only process your personal information for lawful purposes relating to our business if the following applies:
 - 4.4.1. if you have consented thereto.
 - 4.4.2. if a person legally authorised by you, the law, or a court, has consented thereto.
 - 4.4.3. if it is necessary to conclude or perform under a contract, we have with you.
 - 4.4.4. if the law requires or permits it.
 - 4.4.5. if it is required to protect or pursue your, our or a third party’s legitimate interest.
- 4.5. Special personal information is personal information about the following:
 - 4.5.1. your race (like where a company submits reports to the Department of Labour where the statistical information must be recorded).
 - 4.5.2. your ethnic origin.
 - 4.5.3. your trade union membership.
 - 4.5.4. your health (like where you apply for an insurance policy).
 - 4.5.5. your biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offence.
- 4.6. We may process your special personal information in the following circumstances:
 - 4.6.1. if you have consented to the processing.
 - 4.6.2. if the information is being used for any Human resource or payroll requirement.
 - 4.6.3. if the processing is needed to create, use, or protect a right or obligation in law.
 - 4.6.4. if the processing is for statistical or research purposes and all legal conditions are met.

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- 4.6.5. if the special personal information was made public by you.
 - 4.6.6. if the processing is required by law.
 - 4.6.7. if racial information is processed, and the processing is required to identify you; and / or if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligations.
- 4.7. When and from where we obtain personal information about you:
- 4.7.1. We collect personal information from the payroll or HR departments of our clients when they capture financial and non-financial information.
 - 4.7.2. We collect personal information from 3rd parties that are directly integrated with our software platform.
 - 4.7.3. We collect information about you based on your use of our products, services, or service channels.
 - 4.7.4. We collect information about you based on how you engage or interact with us such as via our support desk, emails, letters, telephone calls and surveys.
- 4.8. The third parties from whom we may collect your personal information include, but are not limited to, the following:
- 4.8.1. Partners of our company for any of the purposes identified in this Privacy Policy.
 - 4.8.2. your spouse, dependents, partners, employer, and other similar sources.
 - 4.8.3. 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.
 - 4.8.4. attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
 - 4.8.5. payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
 - 4.8.6. 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.
 - 4.8.7. law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
 - 4.8.8. regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
 - 4.8.9. trustees, Executors or Curators appointed by a court of law.
 - 4.8.10. our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
 - 4.8.11. courts of law or tribunals.
 - 4.8.12. participating partners, whether retail or online, in our customer loyalty reward programmes.
 - 4.8.13. our joint venture partners;
- 4.9. We will process your personal information for the following reasons:
- 4.9.1. to provide you with products, goods, and services
 - 4.9.2. to market our products, goods, and services to you.
 - 4.9.3. to respond to your enquiries and complaints.
 - 4.9.4. 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.
 - 4.9.5. 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.
 - 4.9.6. to develop, test and improve products and services for you.
 - 4.9.7. for historical, statistical and research purposes, like market segmentation.
 - 4.9.8. to process payment instruments.
 - 4.9.9. to create, manufacture and print payment issues (like a payslip)
 - 4.9.10. to enable us to deliver goods, documents, or notices to you.
 - 4.9.11. for security, identity verification and to check the accuracy of your personal information.
 - 4.9.12. to communicate with you and carry out your instructions and requests.
 - 4.9.13. for customer satisfaction surveys, promotional offerings.
 - 4.9.14. insurance and assurance underwriting and administration.
 - 4.9.15. to process or consider or assess insurance or assurance claims.

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- 4.9.16. to provide insurance and assurance policies and products and related services.
 - 4.9.17. to enable you to take part in customer loyalty reward programmes, to determine your qualification for participation, earning of reward points, determining your rewards level, monitoring your buying behaviour with our rewards partners to allocate the correct points or inform you of appropriate products, goods, and services you may be interested in or to inform our reward partners about your purchasing behaviour.
 - 4.9.18. to enable you to take part in and make use of value-added products and services.
 - 4.9.19. to assess our lending and insurance risks; and / or
 - 4.9.20. for any other related purposes.
- 4.10. How we use your personal information for marketing:
- 4.10.1. We will use your personal information to market financial, insurance, investments and other related banking products and services to you.
 - 4.10.2. We may also market non-banking or non-financial products, goods, or services to you.
 - 4.10.3. We will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
 - 4.10.4. If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.
 - 4.10.5. In all cases you can request us to stop sending marketing communications to you at any time.
- 4.11. The supply of certain personal information is mandatory, meaning the law requires us to collect this information from you. If you do not supply this information, we cannot comply with our legal obligations. As a result, if this information is not supplied to us, we will be unable to conduct business with you. We collect personal information as is required by the following legislation:
- Basic Conditions of Employment Act, No 75 of 1997;
 - Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
 - Employment Equity Act, No. 55 of 1998;
 - Financial Intelligence Centre Act, No. 38 of 2001;
 - Income Tax Act 58 of 1962;
 - Labour Relations Act, No. 66 of 1995;
 - Skills Development Act 97 of 1998;
 - Unemployment Insurance Act, No. 63 of 2001;
 - Financial Advisory and Intermediary Service Act, No. 37 of 2002;
 - Occupational Health and Safety Act No. 85 of 1993
- 4.12. In other instances the supply of personal information is voluntary, which means there is no law imposed on us to collect this personal information. Even though there is no law that imposes the collection of the personal information, we may require the personal information to deliver the service to you. As a result, if you do not supply us with the personal information, we will not be able to conduct business with you.

5. OBTAINING CONSENT

The Organisation does not, except where otherwise permitted by law, collect, use or disclose your Personal Information without your consent.

6. USE AND DISCLOSURE OF PERSONAL INFORMATION

- 6.1. The Organisation operates its Website, and conducts its business in general, in accordance with South African legislation. The Organisation considers it imperative to protect the privacy interests of data subjects.
- 6.2. In the event that the Organisation sends Personal Information outside of South Africa (including if such information is hosted offshore), the Organisation will ensure that it takes all reasonable steps to ensure that it complies with all applicable laws in this regard, including POPIA.
- 6.3. We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:
 - 6.3.1. where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
 - 6.3.2. where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
 - 6.3.3. where you have consented to the transfer; and / or
 - 6.3.4. where it is not reasonably practical to obtain your consent, the transfer is in your interest.
- 6.4. This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's

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laws provide better protection the other country's laws would be agreed to and applied.

- 6.5. An example of us transferring your personal information to another country, is where foreign payments take place if you purchase goods or services in a foreign country.

7. RETENTION OF PERSONAL INFORMATION

- 7.1. All Personal Information retained on the Organisation's database, including such information obtained through the use of the Website, is in accordance with the retention provisions set out in the applicable laws and regulations of South Africa, including those set out in POPIA.
- 7.2. We will keep your personal information for as long as:
- 7.2.1. the law requires us to keep it.
 - 7.2.2. a contract between you and us requires us to keep it.
 - 7.2.3. you have consented for us keeping it.
 - 7.2.4. we are required to keep it to achieve the purposes listed in this Privacy Policy.
 - 7.2.5. we require it for statistical or research purposes.
 - 7.2.6. a code of conduct requires us to keep it; and / or
 - 7.2.7. we require it for our lawful business purposes.
- 7.3. Take note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

- 8.1. It is important to note that you have rights in relation to your Personal Information.
- 8.2. Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how you can give effect to the rights listed below.
- 8.3. You have the right to contact the Organisation at any time to ask the Organisation to:
- 8.3.1. confirm that it holds your Personal Information (at no charge);
 - 8.3.2. provide you access to any records containing your Personal Information or a description of the Personal Information that the Organisation hold about you (subject to payment of a prescribed fee); and / or
 - 8.3.3. confirm the identity or categories of third parties who have had, or currently have, access to your Personal Information (also subject to payment of a prescribed fee).
- 8.4. 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.
- 8.5. The Organisation's contact information is as set out in item 1.1 of the Schedule.
- 8.6. When you make a request regarding your Personal Information, the Organisation will take reasonable steps to confirm your identity.
- 8.7. There may be times when the Organisation cannot grant access to your Personal Information, including where granting you access would (i) interfere with the privacy of others; (ii) result in a breach of confidentiality or (iii) where the law may limit your right to access information. The Organisation will always provide you with reasons if this is the case.
- 8.8. You must inform us when your personal information changes.
- 8.9. 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. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.
- 8.10. You may object on reasonable grounds to the processing of your personal information.
- 8.11. 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.
- 8.12. 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. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.

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- 8.13. 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 business relationship with us.
- 8.14. It is important, however, to understand that if you withdraw your consent for the Organisation to use some of your Personal Information, it may affect the quality and level of service that the Organisation can provide to you.
- 8.15. 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.

9. SECURITY

- 9.1. The Organisation has adopted a security model to protect your Personal Information that complies with generally accepted information security practices and procedures. As part of the Organisation's security systems, the Organisation has implemented fire-wall technology, password controls, encryption processes and antivirus software. This is in addition to the physical security measures adopted by the Organisation to ensure that it takes all appropriate, reasonable technical and organisational measures to prevent (i) loss of, damage to, or unauthorised destruction of Personal Information, and (ii) unlawful access to or processing of Personal Information. The Organisation has a stringent security policy in place that every officer, employer and supplier of the Organisation must adhere to.
- 9.2. The Organisation confirms that it takes all reasonable measures to:
 - 9.2.1. identify all reasonably foreseeable internal and external risks to any Personal Information in its possession or under its control;
 - 9.2.2. establish and maintain appropriate safeguards against any risks that are identified by the Organisation;
 - 9.2.3. regularly verify that these safeguards are effectively implemented by or on behalf of the Organisation;
 - 9.2.4. ensure compliance with international ISO security standards; and
 - 9.2.5. ensure that such safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

10. COOKIES

- 10.1. A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.
- 10.2. By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

11. THIRD-PARTY WEBSITES

- 11.1. The Website may contain links to third party websites. In the event that you follow a link to any of these websites, it is important to note that these websites have their own terms of use and privacy policies and that the Organisation does not accept any responsibility or liability for them. If you (i) are a client of the Organisation, or (ii) are a user of the Website, and you have purchased products or services from the Organisation, the Organisation may use your contact details to send you details of any new similar products or services which the Organisation thinks you would be interested in. In doing so, the Organisation will at all times comply with any applicable direct marketing laws.
- 11.2. Any communications that you do receive from the Organisation pursuant to clause 11.1 will set out how to opt out of receiving future communications from the Organisation, free of charge, if you no longer wish to receive material for any reason whatsoever. The Organisation will only send you marketing messages when you tick the relevant boxes at certain times when engaging with the Organisation.
- 11.3. As the Organisation is not responsible for any representations, information, warranties and / or content on any Website of any third party (including websites linked to this Website), the Organisation does not exercise control over third parties' privacy policies and the onus is on the User to refer to the privacy policy of any such third party before providing them with any of your Personal Information.
- 11.4. This Privacy Policy will apply to the processing of personal information by any member of our company. If we process personal information for another party under a contract or a mandate, the other party's privacy policy will apply to the processing.

12. UPDATING OF PRIVACY POLICY

The Organisation, in its sole discretion, reserves the right to update, modify or amend this Policy from time to time if the law or its business

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practices requires it, with or without notice. You therefore agree and undertake to review the Policy whenever you visit the Website. Save as expressly provided to the contrary in this Policy, any amended version of the Policy shall supersede and replace all previous versions thereof.

13. CONTACT INFORMATION

Questions, concerns or complaints related to this Policy or the Organisation's treatment of Personal Information should be directed to the email address set out in item 1.5 of the Schedule.

14. DATA SUBJECT NOTIFICATION

In addition to this document serving as our privacy policy, this document will also serve as our data subject notification as contemplated in section 18 of POPI. In this regard, this document informs 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.

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