

EXTERNAL PRIVACY STATEMENT

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SPUR GROUP (PTY) LTD

“SPUR”

1. INTRODUCTION

1.1. For purposes of this Statement:

1.1.1. “**Applicable Laws**” means all laws, regulations that Spur is required to comply with;

1.1.2. “**Client**” or “**you**” means any prospective, new or existing client of Spur and its subsidiaries; and

1.1.3. “**Spur**” or “**we**” or “**us**” means the Spur Group Proprietary Limited its direct and indirect subsidiaries. To obtain more information on these subsidiaries please refer to www.spurcorporation.com

1.2. This Statement sets out how your personal information will be used by Spur and applies to any information, including personal and special personal information, you give to Spur or which Spur may collect from third parties.

1.3. It is important that you read this Statement carefully before submitting any personal information to Spur.

1.4. By submitting any personal information to Spur you provide consent to the processing of your personal information as set out in this Statement]

1.5. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws;

1.6. Please do not submit any personal information to Spur if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, Spur may not be able to provide its products and services to you.

2. HOW TO CONTACT US

If you have any comments or questions about this Statement, please contact the Information Officer;

Designated Information Officer: Duane Starkey

Email address: informationofficer@spurcorp.com

Postal address: PO Box 166, Century City 7446

Street address: 14 Edison Way, Century Gate Business Park, Century City 7441

Phone number: 021 555 5100

3. **AMENDMENT OF THIS STATEMENT**

- 3.1. We may amend this Statement from time to time for any of the following reasons:
- 3.1.1. to provide for the introduction of new systems, methods of operation, services, products or facilities;
 - 3.1.2. to comply with changes to any legal or regulatory requirement;
 - 3.1.3. to ensure that our Statement is clearer and more favourable to you;
 - 3.1.4. to rectify any mistake that may be discovered from time to time; and/or
 - 3.1.5. for any other reason which Spur, in its sole discretion, may deem reasonable or necessary.
- 3.2. Any such amendment will come into effect and become part of any agreement you have with Spur when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

4. **PRIVACY AND INDEMNITY**

- 4.1. Spur takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).
- 4.2. We have implemented reasonable technical and operational measures to keep your personal information secure.
- 4.3. You hereby indemnify and hold Spur harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to Spur.

5. **INFORMATION WHICH WE MAY COLLECT ABOUT YOU**

- 5.1. We may collect the following information about you:
- 5.1.1. this information may include your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
 - 5.1.2. records of correspondence or enquiries from you or anyone acting on your behalf;

- 5.1.3. details of transactions you carry out with us;
- 5.1.4. details of contracts, sales or leases you carry out with us;
- 5.1.5. sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.

5.2. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Statement.

6. **HOW WE COLLECT INFORMATION**

- 6.1. You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.
- 6.2. We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information.

7. **USE OF INFORMATION COLLECTED**

- 7.1. We may use, transfer and disclose your personal information for the purposes of:
 - 7.1.1. providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
 - 7.1.2. managing your account or relationship and complying with your instructions or requests;
 - 7.1.3. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 7.1.4. assessing and dealing with complaints and requests;
 - 7.1.5. operational, marketing, auditing, legal and record keeping requirements;
 - 7.1.6. verifying your identity or the identify of your beneficial owner;
 - 7.1.7. transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;

- 7.1.8. complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 7.1.9. recording and/or monitoring your telephone calls and electronic communications to/with Spur in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 7.1.10. conducting market research and providing you with information about our products or services from time to time via email, telephone or other means (for example, events);
 - 7.1.11. where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again;
 - 7.1.12. disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
 - 7.1.13. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from Spur or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and Spur; and
 - 7.1.14. improving or evaluating the effectiveness of our business or products, services or offerings.
- 7.2. We may from time to time contact you about services, products and offerings available from Spur or specific subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications via our website, mobile application, or by contacting our Customer Care Centre .

8. **DISCLOSURE OF YOUR INFORMATION.**

- 8.1. Your personal information may be shared with our subsidiaries, our agents and sub-contractors, and selected third parties who process the information on our behalf.
- 8.2. We may also disclose your personal information to third parties in the following circumstances:
 - 8.2.1. to our subsidiaries who are contracted to provide products or services to you;
 - 8.2.2. to assess and monitor any of your applications for our products or services;

- 8.2.3. to determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications.
 - 8.2.4. to have a better understanding of your circumstances and needs to provide and improve our products and services;
 - 8.2.5. to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
 - 8.2.6. to any regulator or supervisory authority, including those in foreign jurisdictions, if Spur is required to do so in terms of Applicable Laws;
 - 8.2.7. to a prospective buyer or seller of any of our businesses or assets;
 - 8.2.8. to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Spur, Clients or other third parties; and/or
 - 8.2.9. to your agent or any other person acting on your behalf, an or an introducer.
- 8.3. We may transfer your information to another of the Spur entities, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.
- 8.4. If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if such disclosure is necessary.

9. **RETENTION OF YOUR INFORMATION**

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

10. ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION

- 10.1. You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 (“**PAIA**”). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Spur, please review our PAIA Manual available for inspection, free of charge, at the offices of Spur and at www.spurcorporation.com
- 10.2. You may request the correction of personal information Spur holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, Spur may limit the products and services offered to you or elect not to open the account.
- 10.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact the Spur Customer Care Centre at Customer-Care@spur.co.za.
- 10.4. You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

11. COMPLAINTS

- 11.1. Should you believe that Spur has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.
- 11.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:
 - 11.2.1. Tel: 012 406 4818
 - 11.2.2. Fax: 086 500 3351
 - 11.2.3. Email: complaints. POPIAComplaints@inforegulator.org.za.