

DATA PRIVACY POLICY

EFFECTIVE DATE: 1 AUGUST 2024

LAST UPDATE; 10 FEBRUARY 2025

VERSION: 2

DATA PRIVACY POLICY

The personal information we collect

Personal information refers to any information that identifies you or specifically relates to you. Personal information that we may process under this policy includes:

- Your name and surname
- Company name and registration number
- Financial history (e.g. income, expenses, obligations, assets and liabilities or buying, investing, lending)
- Marital status (married, single, divorced); national origin; age; language; birth; education
- Identifying number (e.g. an account number, identity number or passport number);
- Email address; physical address (e.g. residential address, work address or physical location); telephone number; and
- Insurance, banking and money management behaviour or goals and needs based on, amongst others, account transactions.

A juristic person (a company, trust or association for example) may also have personal information protected in law and may be processed in terms of this policy.

We may process personal information relating to the juristic person's directors, officers, employees, shareholders, members, representatives,

guarantors, sureties, spouses of sureties, other security providers and other persons (**"Related Persons"**).

If you provide personal information about a Related Person, you warrant that the Related Person is aware that you are sharing their personal information with us and has consented to it.

We will process the personal information of Related Persons as stated in this policy; thus, references to you in this policy will include related persons with the necessary amendments.

The purpose for which personal information is being collected

We collect personal information to:

- Assess and process your applications to use our services;
- To facilitate account creation and the logon process;
- Manage and maintain your user account;
- To verify your identity where required;
- Communicate with you and carry out instructions and requests;
- Respond to enquiries and complaints;
- Enforcing any agreement if you are in breach of the agreement;
- Comply with our record-keeping obligations;
- Conduct market and behavioural research;
- Run customer satisfaction surveys, promotional and other competitions;
- Comply with our legal and regulatory obligations; and
- any other related purposes.

You acknowledge that if you do not provide us with certain information (which may include personal information) that we require to comply with our legal obligations, we cannot provide any services to you.

Legal basis for processing your data

We process your personal information for:

- Our legitimate business interests
- In order to allow you to enter and use our website, app and/or services

- To enter into a contract with you relating to our services
- In order to comply with our legal obligations.

This Data Privacy Policy is governed by the laws of the Republic of South Africa. You agree to submit the personal and exclusive jurisdiction of the courts located within South Africa.

Sources we use to collect personal information

We collect personal information from the following sources:

- Directly from you;
- From public sources (such as company registers, online search engines, deed registries, public posts on social media);
- From technology, such as a customer's access and use including both assisted and unassisted interactions; and
- from third parties that we interact with to conduct our business (such as partners, online partners, credit bureaux, regulators and government departments or service providers).

How long do we keep your personal information

We keep your personal information for as long as:

- The law requires us to keep it;
- A contract between us requires us to keep it;
- You have consented to us keeping it;
- We are required to keep it to achieve the purposes listed in this policy;
- We require it for statistical or research purposes; and
- We require it for lawful business purposes.

We may keep your personal information even if you no longer have a relationship with us and despite your request for us to delete or destroy your personal information provided the law permits or requires us to keep this information.

Use of personal information for marketing purposes

We will use your personal information to market other services to you. You can at any stage, request us to stop sending marketing communications to you.

Use of personal information to make automated decisions

An automated decision is made when your personal information is analysed without human intervention in that decision-making process. An example of automated decision making is the approval or declining of an application when you apply for our services.

You have the right to query any such decisions made, and we may provide reasons for the decisions as far as is reasonably possible.

How do we store your personal information

We take all reasonable and appropriate measures to ensure that your personal information is safeguarded and secure.

We have reasonable standards of technology and operational security in place to attempt to prevent loss or misuse of any personal information.

Any of our authorised employees who are responsible for the maintenance of any special personal information submitted by you are requested to maintain the confidentiality of such information unless you have consented to disclosure.

Whenever we employ third parties to assist us, we will bind them to our privacy policies as far as they may be required to have access to your personal information to perform such services.

Our website may contain links to or from other sites. We try to link to sites that share our high standards and respect for privacy. We are, however, not responsible for the content or the security or privacy practices employed by other sites.

The transmission of information via the internet is not completely secure, however, and we cannot guarantee the security of the information you transmit to our website or App.

How your information is used and disclosed

We may use the information (including personal information) we hold about you in these ways:

- To ensure that our website and App is presented in the most effective manner for you and for your device
- In aggregate and de-identified form, for internal business purposes such as generating statistics and developing our strategic and marketing plans;
- To determine how you interact with our services, the website and the App and based on this information to market our services to you;
- To allow you to participate in interactive features of our App or website when you choose to do so;
- To carry out any contracts that we conclude with you;
- To respond to any queries you make;
- To notify you about changes to our services;
- To monitor user activity such as keyword searches or new postings, and more effectively manage traffic on our website;
- To provide customer services and create and manage user accounts; and
- To assist you with technical difficulties and provide support services.

We may share with third-party service providers certain information, such as your browser capabilities or operating system, that we have collected to understand better which advertisements and services may interest you.

We may block users in certain countries from using our website.

We will not disclose personal information to anyone outside our company or our third parties service providers without your permission unless:

- We are compelled to do so by law or in terms of a court order;
- It is in the public interest to do so;
- It is necessary to protect our rights.

Right to access and rectify personal information

It is your responsibility to ensure all information provided to us is accurate and correct and you may make changes to or correct inaccurate personal information that you provide us using our support services.

Any requests for changes or corrections will be actioned as soon as reasonably possible.

Right to objection

You may object on reasonable grounds to the processing of your personal information where the processing is in your legitimate interest, our legitimate interest or in the legitimate interest of another party.

You must inform us of your objection in the prescribed manner after using our support services.

We will not be able to give effect to your objection if:

- The processing of your personal information was and is permitted or required by law;
- You provided consent to the processing, and our processing was conducted in line with your consent; or
- the processing is necessary to conclude or perform under a contract with you.

Right to withdraw consent / Right to be forgotten

Where you have provided your consent for processing your personal information, including any consent in respect of Related Persons, you may withdraw your consent and request your personal information to be deleted. We will action your request as soon as reasonably possible and to the extent permitted by law.

Right to complain

You have the right to file a complaint with the Information Regulator about an alleged infringement of the protection of your personal information.

The contact details of the Information Regulator (South Africa) are provided below:

JD House, 27 Stiemens Street

Braamfontein

Johannesburg

2001

Tel no.: +27 (0)10 023 5200

Email address: enquiries@inforegulator.org.za

Website: <https://inforegulator.org.za/>

Data Privacy Policy Changes

This policy is reviewed regularly and any changes will be posted clearly on our website.

We reserve the right to change, modify, add or remove portions of these terms at any time.

Data Protection Officer / Information Officer

Our appointed data protection officer, Kolawole Olajide can be contacted at kola@sava.africa.