

Inspirite Data Analytics Services Privacy Notice

1. Background

Inspirite Data Analytics Services (Pty) Ltd ('IDAS'), Registration Number: 2017/653373/07, whose registered office is situated at: Brandfin House, 4 Holwood Crescent, La Lucia Ridge, Umhlanga, KwaZulu Natal, 4051.

IDAS is an authorized agent of Xpert Decision Systems (Pty) Ltd ("XDS") and has been appointed as the sole agent of XDS products in the KwaZulu Natal Region, with the authority to market XDS's and collaborative products nationally.

IDAS is a data business providing solutions and services to a variety of entities in tracing and data management arenas with a focus on development and implementation of various data related products. XDS provides IDAS with specific data categories, hosted and managed by XDS, which IDAS products and services will leverage. IDAS products and services are 'Powered by XDS'.

XDS is a registered Credit Bureau in terms of the National Credit Act, No 34 of 2005 ("NCA"), with the National Credit Regulator ("NCR") registration number; NCRCB05, an Associate member of the South African Credit and Risk Reporting Association ("SACRRA") and a Full member of the Credit Bureau Association ("CBA").

XDS as an EOH Company is obligated to comply with the EOH Governance requirements which includes alignment to and or adherence to group Privacy Policies amongst other policies.

2. Privacy Commitment

IDAS is committed to ensuring that your personal information is processed in accordance with applicable Data Processing Legislation. IDAS will take all reasonable measures, through the implementation of appropriate policies, procedures, technology and controls to ensure that your personal information is appropriately secured and protected and processed only for lawful purposes.

3. Information Collection

3.1 In some instances, when engaging directly with you, IDAS acts as a Responsible Party in terms the Protection of Personal Information Act ("POPIA") or a Data Controller in terms of the General Data Protection Regulations ("GDPR"). In all other instances IDAS may be regarded as a Data Processor or Operator. IDAS collects your personal information when you register, with IDAS for any service or product provided by IDAS. This information may be updated to your personal information as held by IDAS.

3.2 The NCA also authorizes a credit bureau to receive consumer credit information from the following sources

- An organ of State, a court or judicial officer
- Any person who supplies goods, services or utilities to consumers, whether for cash or credit
- A person providing long terms and short terms insurance
- Entities involved in fraud investigation
- Educational Institutions
- Debt Collectors to whom book debt was ceded or sold by a credit provider

- Other registered credit bureau
- The NCR or any source authorized by the NCR
- A consumer for the consumer to correct or challenge information held by a credit bureau

XDS may also receive the following information about you from yourself or an entity that you may have provided consent to, or an entity that is lawful authorized to access your information or who may lawfully share your information with XDS.

Individual

- Identity or Passport number
- Name details
- Contact information
- Other lawful information that you may have consented to

Juristic

- Registration Number
- Name details
- Contact information
- Financial Information
- Trade References
- Number of Employees
- Personal details of Directors
- Other lawful information that the Juristic has consented to

3.3 IDAS may make use of cookies, which may be placed on your computer when you both visit and or register on any IDAS website or product site. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser.

3.4.1 IDAS cookies may be used for the following for the following purposes:

- To enable certain features and functions on websites, e.g. remembering user-id, favourite channel selections, browsing and other service preferences;
- To build up a profile of how users experience the website;
- To improve the efficiency of IDAS's website;
- To administer services to users and advertisers; and
- To establish usage statistics.

3.4.2 Most internet browsers provide users with the option of turning off the processing of cookies (please see the "help" section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.

3.4.3 Advertisements on the IDAS website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. IDAS does not control these third parties and their cookie policies and therefore is not responsible for the Personal Information

policies (including Personal Information protection and cookies), content or security of any third party websites linked to the Website.

- 3.4 IDAS may also collect information that your browser sends whenever you visit IDAS websites. This information may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, and the pages of the IDAS website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

4. Information Use and disclosure

4.1 Use and Disclosure as per NCA

- 4.1.1 The NCA provides the purposes for which IDAS may release consumer credit information. In addition to the NCA, IDAS will adhere to processing obligations embodied in POPIA and GDPR. In terms of the NCA, a credit bureau may release consumer credit information for the following purposes: -

- an investigation into fraud, corruption or theft, provided that the South African Police Service or any other statutory enforcement agency conducts such an investigation;
- fraud detection and fraud prevention services;
- considering a candidate for employment in a position that requires honesty in dealing with cash or finances;
- an assessment of the debtor's book of a business for the purposes of (i) the sale of the business or debtors book of that business; or (ii) any other transaction that is dependent upon determining the value of the business or debtors book of that business;
- setting a limit of in respect of the supply of goods, services or utilities;
- assessing an application for insurance;
- verifying educational qualifications and employment;
- obtaining consumer information to distribute unclaimed funds, including pension funds and insurance claims;
- tracing a consumer by a credit provider in respect of a credit agreement entered into between the consumer and the credit provider;
- developing a credit scoring system by a credit provider or credit bureau;
- an affordability assessment in respect of a consumer, as required by Section 81 of the Act;
- a credit assessment in respect of a consumer, as required by section 81 (2) of the Act;
- investigating an application for debt review made by a consumer
- a contemplated or permitted purpose as may be envisaged by the NCA

- 4.1.2 IDAS may use the information you provide to maintain contact with you in terms of

- Any queries that you may have lodged with IDAS
- Keeping you informed about new developments on or any changes to the services you may have access.

- 4.1.3 IDAS may process your information as may be allowed in terms of POPIA.

- 4.1.4 IDAS may process your personal information for the provision of marketing services when requested to do so by third parties to whom you have provided consent to.

- 4.2 IDAS may use cookies to identify you when you access a IDAS website and to build up a demographic profile of its users.

- 4.3 IDAS may use your Personal Information

- 4.3.1 to contact you with newsletters, marketing or promotional materials and other information or
- 4.3.2 to conduct market research and surveys to enable IDAS to understand and determine customer location, preferences and demographics in order to develop special offers and marketing programmes, and to improve our service delivery and customer experience;
- 4.3.3 to provide additional products, services and benefits to users, which include promotions, loyalty and reward programmes from IDAS;
- 4.3.4 to match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services;
- 4.3.5 To administer contests, competitions and marketing campaigns, and personalize user experience;
- 4.3.6 To communicate advertisements involving details of IDAS's products and services, special offers and rewards, either to general customers, or to communicate advertisements which IDAS has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling and telemarketing);
- 4.4 In relation to particular products and services or user interactions, IDAS may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- 4.5 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication from IDAS. Users may contact IDAS Information Officer: informationofficer@inspirit.co.za to request the withdrawal
- 4.6 Once IDAS receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be effected. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. It may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, IDAS may still contact users for other purposes in relation to the products and services accessed by users or subscriptions to IDAS.

5. Cross Border transfer

- 5.1 IDAS may transfer your personal information to another country for storage and processing provided that the country has equivalent or better data protection laws in order to adequately protect your personal information.
- 5.2 IDAS shall transfer your personal information on a processing request originating from a IDAS Client located outside of the Republic of South Africa, should you have consented to such processing or if such processing is in accordance with Data Processing legislation.

6. Information Retention

- 6.1 IDAS will retain your personal information in accordance with any retention legislation relating to such personal information.
- 6.2 In the absence of any legislation governing a particular type of personal information, IDAS shall retain such information for a period of 20 (twenty) years unless (i) you have consented to a longer retention period or (ii) you request the deletion of such personal information, provided that there is no lawful reason for which such personal information must be retained by IDAS.
- 6.3 After 20 years your personal information shall be de-identified and archived for audit and investigation purposes.
- 6.4 You may request the deletion of your personal information as per (6.5)(ii) by calling IDAS on 031 584 7379 or emailing

informationofficer@inspirit.co.za and using the subject : **Request deletion.**

- 6.5 You will be required to provide proof of identity as may be determined by IDAS and to follow IDAS procedures related to your request.

7. Security

- 7.1 The security of your Personal Information is important to IDAS.
- 7.2 XDS Information Security Policies guides the processing of personal information and ensures that IDAS, with XDS protects your personal information.
- 7.3 The personal information that IDAS collects and processes shall be secured by appropriate technical and organizational measures against accidental loss, destruction or damage, and against unauthorized or unlawful processing.
- 7.4 IDAS shall regularly evaluate and test the effectiveness of such measures to ensure that they are adequate and effective.
- 7.5 IDAS is a responsibility for ensuring the security of personal information processed throughout the performance of its duties.

8. Changes to this Privacy Notice

- 8.1 IDAS may update or change this Privacy Notice as often as required in order to adequately reflect the processing of personal information by IDAS.
- 8.2 You should check this Privacy Notice periodically to access the most recent Privacy Notice

9. Contact Us

If you have any questions about this Privacy Notice, please contact IDAS Information Officer:
informationofficer@inspirit.co.za