PRIVACY NOTIFICATION

IN TERMS OF SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013

THE RESPONSIBLE PARTY
Convert Cash (Pty) Ltd trading as Cash Converters Centurion Mall
Registration Number 2001/001861/07

Physical Address
Shop 328 and 329B Centurion Mall
1269 Gordon Hood Road
Centurion
Centurion

Email Address - centurion@cashconverters.co.za

Contact Number
012 663 2126/62 or 087 164 4969

www.cashconverters.co.za

1 July 2022

1. <u>INTRODUCTION</u>

Section 14 of the Constitution of the Republic of South Africa, 1996, provides that everyone has the right to privacy. The Protection of Personal Information Act, 2013, ("POPIA") regulates and controls the processing of a person or legal entity's personal information, which processing includes the collection, use, transfer and destruction of a person or legal entity's information where such information can be used to identify the person.

2. <u>DEFINITIONS</u>

2.1. **"Person"** means a natural person or a juristic person.

2.2. **"Cash Converters"** means Convert Cash (Pty) Ltd trading as Cash Converters Centurion Mall, or any other entity trading as a Cash Converters store or the Cash Converters Franchisor or any of its affiliates.

2.3. **"Data Subject"** means you, the person who will provide the responsible party or its operator(s) with personal information and who consents when providing such personal information, to the responsible party or its operator's use thereof in accordance with this Privacy Notification.

2.4. **''Responsible Party''** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

2.5. **"Operator''** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

2.6. **"Personal Information"** means information relating to any identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, namely the data subject, including, but not limited to:

2.6.1. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person,

2.6.2. Information relating to the education or the medical, financial, criminal or employment history of the person,

2.6.3. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or another assignment to the person,

2.6.4. The biometric information of the person,

2.6.5. The personal opinions, views or preferences of the person,

2.6.6. Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence,

2.6.7. The views or opinions of another individual about the person, and

2.6.8. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

2.7. **"Regulator"** means a person or body that supervises an industry or business activity.

2.8. **"Special Personal information"** includes any information relating to an individual's: ethnicity, gender, religious or other beliefs, political opinions, membership of a trade union, sexual orientation, medical history, offenses committed or alleged to have been committed by that individual, biometric details, and children's details.

2.9. **"Minor"** means a person under the age of 18 years.

2.10. **''Electronic communication''** means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or the recipient's terminal equipment until it is collected by the recipient.

2.11. **"Consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

2.12. **''Information Officer''** of, or in relation to, private body means the head of a private body as contemplated in section 1, of POPIA.

2.13. **''Processing''** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

2.13.1. The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, 2.13.2. Dissemination by means of transmission, distribution or making available in any other form, or

2.13.3. Merging, linking, as well as blocking, degradation, erasure or destruction of information.

3. COLLECTION OF PERSONAL INFORMATION

3.1. **What Personal Information do we collect?**

Personal information is collected either by voluntary action, automatic process or via third-party processors.

3.1.1. Voluntary: We have access to/collect personal information that you voluntarily give us via email or other direct contacts from you. Typically, we may collect, use and store the following categories of personal information about you (but not limited to):

a) Identifying particulars – for example full names, identification numbers (identity number, driver's license number or passport number plus a copy of your identification document), company registration numbers, customer biometric, customer photo, personal expense information etc. for legal obligation, accounting, service delivery and payment purposes,

b) Contact information – for example physical addresses plus proof, telephone numbers, e-mail addresses, etc.,

c) Financial information – an example is your Cashies Card number, bank account details and bank statements,

d) Employment information,

e) Personal information you choose to provide to us,

f) Personal information when you contact us directly,

g) Personal information you provide through our websites,

h) Personal information from former, current and prospective clients, our suppliers and their employees, as well as contractors and others.

3.1.2. Automatic: We may also have access / collect personal information that we collect automatically – an example is CCTV images in our shop and when you visit our website.

3.1.3. Third Parties: We may also collect information about you through our trusted third-party sources to assist us in providing product and service offerings to you – an example is Credit Bureaux information about you and confirmation of the validity of your TV license.

In terms of the POPIA we must have accurate and up-to-date information about you. Please check that your personal details are correct whenever you visit us and inform us of any changes.

Personal information is collected directly from data subjects. We may also use other sources, subject to restrictions under applicable law, to assist in obtaining relevant personal information about you.

3.2. Is the supply of the information voluntary or mandatory, plus the particular law authorising or requiring the collection of the personal information?

3.2.1. Supplying personal information is voluntary, but the supply of certain types of personal information is mandatory in terms of legislation and regulations.

3.2.2. For example –

a) Second-Hand Goods Act, 2009 - To enable us to transact in second-hand goods with you and to comply with the determinations of Section 21 of the Second-hand goods Act, you must supply us with the following personal information:

- Full names,
- Identity number, or passport number,
- Contact address,
- Contact telephone number, and
- Your original South African identity document, South African driver's license or passport as proof of your identity.

Failure to supply us with any of the above information will result in us being unable to transact in second-hand goods with you.

b) **National Credit Act, 2005** - To enable us to enter into a Credit Agreement with you and to comply with the determination of the National Credit Act and Regulations thereto, you must supply us with the following personal information:

- Full names,
- South African identification number, South African driver's licence number or passport number,
- Proof of residence,
- Contact telephone or cellular number,
- Your original South African identity document or passport as proof of your identity,
- Signature,
- Credit bureau information,
- Confirmation of income (Payslip),
- Confirmation of monthly living expenses,
- Bank statements,
- Employment confirmation.

Failure to supply us with any of the above information will result in us being unable to enter into a Credit Agreement with you.

4. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Whenever we transfer your personal information out of the country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

4.1. We will only transfer your personal information to countries that have appropriate data protection and privacy legislation to protect your personal information.

4.2. Where we use certain service providers, we conclude an agreement with them to confirm that your personal information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measures to protect your personal information.

By submitting your personal information to us you consent to the transfer of your personal information outside the borders of the Republic of South Africa.

5. PURPOSE FOR PROCESSING OF PERSONAL INFORMATION

Cash Converters must collect personal information only for a specific, explicitly defined and lawful purpose related to a function or activity of Cash Converters. Our purpose for collecting your personal information are:

Description of category of data subjects	Purpose of the Processing
Employees	1. Human Resource Management 2. Verification of applicant employees' information during recruitment process 3. General matters relating to employees: a. Payroll; b. Disciplinary action; c. Training relationship. 4. Any other reasonably required purpose relating to the employment or possible employment. 5. Legal obligation
Customers	1. Registration as a customer. 2. Compliance with Legislation. 3. Delivering of Service. 4. Manage payments, collections, etc. 5. Manage our relationship.
Visitors	1. Security of employees and facilities. 2. Disaster Management

Suppliers, professional advisers and consultants	1. Administration of Agreement 2. Verifying and updating information 3. Performing duties in terms of any agreement. 4. Facilitating banking transactions with customers. 5. Make, or assist in making, credit decisions. 6. Operate and manage accounts and manage any application, agreement or correspondence vendors may have with us. 7. Communicating with vendors by email, SMS, letter, telephone or in any other way about our services. 8. Performing other administrative and operational purposes including the testing of systems. 9. Recovering any debt customers may owe us. 10. Complying with the regulatory and other obligations. 11. Any other reasonably required purpose relating to our business.
Public Bodies (e.g. Department of Labour) and Statutory Bodies	1. Legal obligation

6. SHARING OF PERSONAL INFORMATION

Your personal information will be treated as prescribed by the 8 conditions for the lawful processing of personal information in the POPIA Act. We may share your personal information with:

6.1. Partners & Affiliated Companies - Any partner, Cash Converters Franchisee or an affiliated company.

6.2. Service Providers - We may disclose the information we collect from you to third-party contractors, technology and other service providers or agents who perform functions on our behalf or are engaged with us. These service providers are allowed to access and use the information we make available to them only as needed to perform their functions and for no other purposes, subject to appropriate contractual restrictions and security measures.

6.3. In Response to Legal Process - We may disclose the information we collect from you in order to comply with the law, a legal proceeding, court order, or other legal processes such as in response to a court order or a subpoena.

6.4. Third Parties –

6.4.1. Third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions, third party payment providers and transaction beneficiaries.

6.4.2. Third parties where you have a relationship with that third party, and you have consented to us sending information (for example social media sites or other third-party application providers).

6.4.3. Third parties for marketing purposes (e.g., our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations (such as banks, insurers, finance providers), payment solutions providers, software and services providers that provide business solutions).

6.4.4. To Protect Us and Others - We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notification, or as evidence in litigation in which we are involved.

6.5. Government - Government bodies, regulators and any other third party necessary to meet our legal and regulatory obligations.

6.6. Professional Advisors - our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities.

7. <u>AMENDMENTS</u>

This policy is effective from 1 July 2022. We regularly review our practices and policies to ensure that your personal information is secured, and our practices and policies are compliant with all relevant legislation. We therefore reserve the right to amend this Privacy Notification at any time and for any reason. We will notify you of any changes by displaying a notice in a prominent place in the store or on the Cash Converters Website.

8. <u>RETENTION OF PERSONAL INFORMATION</u>

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Notification. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with the applicable laws), to resolve disputes, and to enforce our legal agreements and policies.

9. <u>YOUR RIGHTS AS A DATA SUBJECT.</u>

As a data subject in terms of the POPIA Act, you do have the following rights:

9.1. Right of Access:

The right to establish whether we hold personal information on you and to request access to your personal information.

9.2. Right to Correction, Destruction or Deletion:

The right to request, where necessary, the correction, destruction or deletion of your personal information.

9.3. Right to Objection:

The right to object –

9.3.1. On reasonable grounds relating to your particular situation to the processing of your personal information,

9.3.2. To the processing of your personal information -

a) At any time for purposes of direct marketing, or

b) For purposes of direct marketing by means of unsolicited electronic communications

9.4. Right to Complain:

The right to –

9.4.1. Submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as, and

9.4.2. To institute civil proceedings regarding the alleged interference with the protection of your personal information.

9.5. Complaint's Process:

If you believe that this office has not replied to your access request or has not handled your Personal Information in a reasonable manner, please address your concerns first with our Information Officer. You may also choose to make a complaint to the Information Regulator.

Contact Particulars of our Information Officer

Name:	Alan Smith
E-Mail me:	centurion@cashconverters.co.za
Visit us:	1269 Gordon Hood Road, Centurion, Centurion
Write to us:	As Above
Call us:	012 663 2126/62 or 087 164 4969

Contact Particulars of the Information Regulator

Visit their website:	https://www.inforegulator.org.za/docs.html
Visit them:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Write to them:	P.O Box 3153, Braamfontein, Johannesburg, 2017
Call them:	010 023 5200
Ask a general enquiry by email	enquiries@inforegulator.org.za
Lodge a complaint by email	PAIAComplaints@inforegulator.org.za