

Privacy Notice

All personal information supplied by you, whether voluntarily or mandatory, will be recorded and processed regardless of the form or medium in which the information is supplied. We have a strong commitment to respecting concerns regarding privacy and will process all personal information in accordance with the provisions set out hereunder.

Collecting Personal Information:

We endeavour to collect and process information which has been collected directly from you. We may however receive personal information indirectly from our clients, subsidiaries and third-parties' through the course of business and in line with legislative requirements.

We may need to collect the following information:

1. Postal and/or street address
2. Title and name
3. Contact numbers and/or e-mail address
4. Ethnic group
5. Employment history
6. Age
7. Gender
8. Marital status
9. Nationality
10. Language
11. Financial information
12. Identity or passport number

We collect personal information in order to liaise with you telephonically, via email and or our website so that we may:

1. respond to any query or comment received from you;
2. inform you of new services;
3. enable us to process, validate and verify information and requests for the supply of services;
4. for the purposes for which you specifically provided the information; and
5. to improve your experience on our website.

Minors:

We do not intentionally collect personal information from minor children. If you are the parent or guardian and believe your minor child has provided us with personal information, please contact us at the address below to request the deletion thereof.

Processing of Information:

We will share your personal information:

1. in order to comply with applicable law or with legal process served on our company;
2. in order to protect and defend the rights or property of our company; and
3. with employees and/or third parties who assist us in providing services to you and thus require your personal information in order to render a proper and efficient service. We will ensure that all such employees and third-party service providers, having access to your personal information, are bound by confidentiality agreements.

In accordance with the provisions of the Protection of Personal Information Act (POPIA), we process personal information where:

1. it is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
2. the processing complies with an **obligation** imposed by law on the business;
3. the processing protects a **legitimate** interest of the data subject;
4. the processing is necessary for the proper performance of a **public law** duty by the business;
or
5. the processing is necessary for pursuing the legitimate **interests** of the business or of a third-party to whom the information is supplied.

Collection of Information by “Cookies”

You are aware that information and data is automatically collected through the standard operation of the Internet server/s and through the use of "cookies." "Cookies" are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the website and allow a website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our website.

Security Measures:

We will:

1. treat your personal information as strictly confidential;
2. take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
3. promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information; and
4. provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request.

Retention:

We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

Selling Personal Information:

We do not sell the information and will only share same with service providers as set out herein.

Your rights:

You have the right at any time to:

1. access your personal data by sending a written request to our Information Officer who's contact details are set out below. We may charge you a fee for this service.
2. request us to correct or supplement any of your personal data which we will undertake as soon as practicable.
3. request the return or destruction of Personal Information. We will consider your request in light of any other laws or regulations prohibiting us from destroying your personal data;
4. withdraw your consent to process your Personal Information. In the event however that you elect to withdraw your consent, this will not affect the lawfulness of our use of your Personal Information but may entail that we may no longer be able to provide you with your chosen product or service; and
5. lodge a complaint with the company.

Transborder Flow of Information:

We may transfer your information outside South African borders for retention purposes and/or if our service provider/s are cross border or use/s cross border systems. We will only share your information with service providers who have comparable privacy policies in place.

Changes:

We may update this privacy notice from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

Contact:

For more information about our privacy practices, if you have questions, or if you would like to lodge a complaint, please contact the Information Officer, in writing, via e-mail at POPI@cbagroup.co.za

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with:

THE INFORMATION REGULATOR (SOUTH AFRICA) SITUATE AT: JD HOUSE, 27 STIEMENS STREET, BRAAMFONTEIN, JOHANNESBURG, 2001.

COMPLAINTS: complaints.IR@justice.gov.za

GENERAL QUERIES: infoereg@justice.gov.za