

FINESSE FINANCIAL SOLUTIONS

DISCLOSURES AND COMMITMENT IN TERMS OF THE POPI ACT

1. We recognise the importance of protecting your privacy and are committed to protecting and preserving your personal information in accordance with the **Protection of Personal information Act 4 of 2013 (“POPI Act”)**.
2. We refer to information about you and your personal information captured on our system in order to carry out our services to you, from which you would be directly or indirectly identifiable as a data subject on our system and correspondence going forward. We may also collectively refer to collecting, receiving, recording, organising, sorting, updating, modifying, handling, or using your personal information with consent as “processing” such personal information.
3. As you have provided your information to us at the signing of the Form 16 application form and relevant consents, for the purpose of providing debt counselling solutions and related services, we will continuously ensure that we abide by the regulations of the POPI Act.
4. This communication explains how we process your personal information.

a) COLLECTION OF PERSONAL INFORMATION

We only process personal information that is adequate, necessary, relevant, and is not excessive. We may collect personal information from you in the course of our relationship with you to render efficient services to you. Such personal information may include personal details (such as your name and identity number), contact details (such as your email address, postal address, physical address and contact number), and financial information (such as bank statements, payslips etc.).

b) HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected and will be processed for that purpose only. The personal information we have collected from you is necessary

- to provide our services to you,
- to administer and manage such services,
- to confirm, verify and update your details from time to time,
- to provide you with feedback and information via email correspondence,
- to conduct credit reference searches or verification,
- for audit and record keeping purposes,
- in connection with legal proceedings,
- to provide communication in respect of any business, legal or regulatory matters that may affect you,
- we will not retain your Personal Information for longer than is necessary to achieve the purpose for which we collected it unless there is a lawful basis or legal requirement for us to retain your Personal Information for a longer period.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

- a) We may disclose your personal information to a service provider who may be involved in the delivery of our services to you.
- b) We require that our service providers take appropriate, reasonable, technical and organisational measures to keep your personal information secure and not use or disclose the personal information for any purpose other than providing the services on our behalf.
- c) We may also disclose your personal information:
 - i. when explicitly requested by you;
 - ii. where we have a duty or a right to disclose in terms of law;
 - iii. where we believe it is necessary to protect our rights.
 - iv. safeguarding your information

- v. where we believe we have a legitimate limited business interest; and
- vi. any other relevant and necessary third-party provider.

6. MARKETING ACTIVITIES

We do not use your personal information for marketing activities. However, if you wish to no longer receive communications, please identify such communications in your request via email to romie@debtfinesse.co.za.

7. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

a) The personal information you provide to us should be accurate, complete and up to date. Should any of your personal information change, please notify us of such change and provide the correct personal information.

b) You are entitled to:

- i. request access to your personal information held by us,
- ii. object to the processing of your personal information,
- iii. withdraw your consent to the processing of your personal information,
- iv. withdraw your consent to receive any marketing material,
- v. request the correction or amendment of incorrect personal information held by us,
- vi. request deletion of your personal information held by us, after the regulated timeframes as stipulated by the NCA,
- vii. request a transfer from Finesse Financial Solutions including your personal information to another organisation,
- viii. seek relief to your local data protection authority should any of your privacy rights be violated.

8. RETENTION OF INFORMATION

Records of your personal information will not be retained or stored for any longer than is necessary for achieving the purpose for which such information was collected or subsequently processed in accordance with the National Credit Act.

9. SECURITY AND NOTIFICATION

We will take all appropriate, reasonable, technical and organisational security measures to protect your personal information that is in our possession to prevent loss of damage to or unauthorised alteration or destruction of your personal information or unlawful access to or processing of your personal information in accordance with the applicable law. Only authorised persons are provided access to your personal information and such individuals have agreed to maintain the confidentiality of this information.

Should we reasonably believe that your personal information has been unlawfully accessed or acquired by any unauthorised persons, we will notify the relevant regulator and you, unless we are made aware that notifying you will impede a criminal investigation.

Should you require more information about how we process your personal information please contact Romie on 0842502356 or email romie@debtfinesse.co.za.