## **PRIVACY STATEMENT**

Eftsure Africa (Pty) Ltd. (Registration Number: 2018/515630/07) respects your right of privacy and your right to control your personal data. We are committed to processing personal data fairly and lawfully.

We take appropriate measures to safeguard personal data against access or amendment by unauthorised persons and to prevent its unlawful loss, damage or destruction.

We encourage you to read our Data Protection Policy below.

The Data Protection Policy is supported by procedures and standards that are based on best practice. These are reviewed regularly and, where necessary, are improved to combat everchanging cyber risks.

You may contact our information officer at <a href="legal@eftsure.co.za">legal@eftsure.co.za</a> with queries that you may have relating to your personal data and we will respond to you promptly.



# DATA PROTECTION POLICY EFTSURE AFRICA ("Eftsure")

POLICY

VERSION: 09092021

**EFFECTIVE DATE: 09/09/2021** 

#### 1. PURPOSE

This policy describes the principles governing the processing of personal data by eftsure.

## 2. SCOPE

This policy applies to all personal data processed in the course of eftsure's business.

## 3. GLOSSARY

Unless inconsistent with the context, the words and expressions in this policy (and procedures, standards and guidelines supporting this policy) have the meanings assigned to them in the eftsure Glossary of Terms.

#### 4. EFTSURE DATA PROTECTION POLICY

#### 4.1 eftsure:

- 4.1.1 is accountable for and processes personal data in compliance with the conditions and principles governing its lawful processing;
- 4.1.2 collects personal data for specific, explicitly defined and lawful purposes and does not further process personal data in a manner that is incompatible with those purposes;
- 4.1.3 only processes personal data that is adequate, relevant and not excessive for the purpose of the processing;
- 4.1.4 processes personal data transparently to the data subject and in a manner that is fair and does not infringe the privacy of the data subject;
- 4.1.5 does not process personal data unless it is lawfully justified in doing so. Where it relies on the justification of consent, the consent granted by the data subject will be indicated by a clear affirmative action expressing specific consent, freely given, providing an unambiguous indication of the data subject's wishes;
- 4.1.6 collects personal data directly from the data subject, unless it is permitted by law to collect the information from other sources;
- 4.1.7 takes appropriate measures to safeguard the integrity and confidentiality of personal data and to prevent its loss or damage, unlawful access and unauthorised destruction;
- 4.1.8 by written contract, binds third parties processing personal data on its behalf, to establish and maintain appropriate security safeguards as well as comply with the principles set out in this policy;
- 4.1.9 provides timely notification to data subject and data protection authorities of a compromise of the data subject's personal data;



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4.1.10 processes personal data transparently to the data subject and takes reasonably practicable steps to ensure that the information is accurate and kept up to date;

- 4.1.11 permits and assists data subjects to access their personal data and corrects or deletes information that is inaccurate;
- 4.1.12 assists data subjects who object to the processing of their personal data;
- 4.1.13 retains personal data for the periods required by law, contracts with third parties or as reasonably required for business purposes, but not for any longer than is necessary to achieve the purpose for which the personal data was collected and processed;
- 4.1.14 will not use personal data for the purpose of unsolicited electronic communication, nor for automatic decision-making, without the consent of the data subject;
- 4.1.15 only transfers personal data across borders to jurisdictions that effectively uphold the principles and conditions governing the protection of personal data established in the Republic of South Africa, alternatively if the data subject has consented to the transfer.

## 5. POLICY RESPONSIBILITY

- 5.1 eftsure has appointed a Data Protection Committee to oversee data protection at eftsure.
- 5.2 The Data Protection Committee requires all eftsure employees, agents or invitees to uphold its data protection policy.
- 5.3 The eftsure CEO has appointed an Information Officer and delegated to the Information Officer the authority to fulfil the duties and responsibilities required in relevant legislation and regulation.

### 6. REVIEW AND AUDIT

- 6.1 This policy (and the procedures and standards supporting this policy) is reviewed by the eftsure Data Protection Committee regularly, and at least once in each year.
- 6.2 Reviews and any revisions of this policy (and the procedures and standards supporting this policy) will be recorded in an Approval and Revision History filed with this policy.
- 6.3 Compliance with this policy (and the procedures and standards supporting this policy) is monitored and is subject to audit.