

Privacy Policy

Please Note:

This Privacy Policy is incorporated into and is subject to Accountability's Subscriber Terms and Conditions of Use as reflected on our website, <https://www.accountability.co.za/>

Definitions

- 1.1 The following terms have the meanings assigned to them hereunder, unless the context clearly indicates otherwise:
 - 1.1.1 "Accountability" hereby refers to Accountability Group (Pty) Ltd (registration number 2008/012163/07) and Accountability Solutions (Pty) Ltd (registration number 2017/365254/07), both companies incorporated in terms of the laws of South Africa, having its main place of business at 29 Bella Rosa Road, Rosenpark, Bellville, 7530 which it hereby elects as its *domicilium citandi et executandi*.
 - 1.1.2 "Consumer Credit Information" means consumer credit information as defined in Section 70 of the NCA.
 - 1.1.3 "Personal Information" means Personal Information as defined in Section 1 of the POPIA.

Preamble

- 2.1 Accountability strives to ensure that your privacy is protected. This Privacy Policy, therefore, regulates the manner in which we collect, use, process, disclose, transfer and retain your Personal Information.



- 2.2 We comply with the National Credit Act, 2005 (No. 34 of 2005, as amended) (“**NCA**”), The Protection of Personal Information Act, 2013 (No. 4 of 2013, as amended) (“**POPIA**”), and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No. 25 of 2002, as amended) which govern your right to have your Personal Information kept private and which are covered in this Privacy Policy.
- 2.3 Accountability represents a large number of companies, including certain Sole Proprietors, which use our services for the purposes set out and regulated by the NCA and its Regulations.
- 2.4 As Accountability Group (Pty) Ltd is registered in terms of Section 43 of the NCA as a Reseller Credit Bureau, our operations are closely monitored and regulated by the National Credit Regulator.

Collection of Information

- 3.1 You may be requested to provide your Personal Information when registering, accessing, or using any Services (as defined under the Subscriber Terms and Conditions of Use that is available on the Accountability Website). In this regard, we may collect a variety of information, including your:
- 3.1.1 full name;
 - 3.1.2 telephone numbers;
 - 3.1.3 email address;
 - 3.1.4 SA ID number and/or Date of Birth;
 - 3.1.5 address details;
 - 3.1.6 marital status;
 - 3.1.7 family relationships; or
 - 3.1.8 security questions relating to your Consumer Credit Information on your credit report and/or payment profile.



Types of information collected

4.1 Consumer Credit Information

4.1.1 Consumer Credit Information that is received and processed by Accountability is received from our Members. Accountability does not procure any Consumer Credit Information for any other reason than for statutory reasons.

4.1.2 Our services to our Members are for, *inter alia* the following statutory purposes:

4.1.2.1 Debtors' book administration, including but not limited to:

4.1.2.1.1 Reporting of defaults to Credit Bureaus

4.1.2.1.2 Tracing of defaulting debtors;

4.1.2.2 Client credit vetting;

4.1.2.3 Debt collection registration with registered debt collectors; and

4.1.2.4 Avoiding the granting of reckless credit, as contemplated in Section 81 of the NCA.

4.1.3 Accountability will access Consumer Credit Information from the National Credit Register for purposes of consumer identification and/or consumer identification verification. Information obtained for this purpose is not manipulated or interpreted in any manner or form. Reseller Credit Bureaus are prohibited by the provisions of Section 43 of the NCA, read with the Regulations made in terms of Section 171 of the NCA, from performing such actions.

4.1.4 The Consumer Credit Information that is stored on our system, can only be accessed by the subscribing member who initially uploaded such information to our system.

4.1.5 The Accountability Website and our data communications conform to the ISO 27001 security standards, and the website, services content and data communication is protected with high-level ESET anti-virus protection.



4.2 Internet Information

When you visit and/or use any products or functions on the Accountability Website, we may collect behavioural data and general internet data, including your internet protocol ("IP") address, metadata, location data, as well as the date and time of your visit:

4.2.1 A "cookie" is also set on your computer to allow us to recognize you whenever you visit the website and to collect information, like the pages you view and your preferences. We use the information we collect for statistical purposes and to study how the Accountability Website is used so that we may improve and enhance your experience on the Accountability Website. We may provide such information collected to outside vendors located overseas for such purposes. No Personal Information is stored in cookies. It is possible for you not to accept our cookies while using the Accountability Website by setting the preference in your web browser. If you do so, you may not be able to utilise the online services but you can still visit the pages on the Accountability Website. If you would like more information about cookies, you can visit http://www.cookiecentral.com/n_cookie_faq.htm

4.2.2 Accountability uses two different types of cookies. One type of cookie is used so that the Accountability Website "recognizes" you each time you return using the same computer, and you do not have to re-enter all your Personal Information on each visit. You can set your web browser to refuse to accept this cookie, or delete this type of cookie from your hard drive, and still access our products and services, as long as you re-enter your information each time you visit. The second type of cookie is needed so that we can process each step of your transactions with us. If you refuse to accept this type of cookie, you will not be able to access our products and services. Most web browsers automatically delete this type of cookie when you terminate your session;



4.2.3 We may use domestic or overseas third-party advertising companies to serve advertisements on the Accountability Website or on other websites which we use for advertising. These companies may employ cookies and action tags (also known as single-pixel gifs or web beacons) to measure advertising effectiveness, and they are not authorized to use the information we share with them for any other purposes. Any information that these third parties collect via cookies and action tags are completely anonymous; and/or

4.2.4 We may use Google Analytics or other similar analytical tools to obtain information collected in order to display, optimize and personalize advertisements and customer experience on our web properties that are designed to bring visitors to the Accountability Website, to determine which advertisements you may find useful, and to personalize your experience on the Accountability Website and web properties. We may also use this information to segment, enhance or modify our advertisements and to personalize your experience.

4.3 Anonymous Data

4.3.1 In order to enhance the usefulness of the Accountability Website and our Services, we will collect data about our customers' use of our Website, in a manner that does not include any Personal Information.

4.3.2 While you browse the Accountability Website, we note which pages of the Website you visit and note the IP address of your computer (as all websites do automatically), but we do not link that address information to your Personal Information, other than for purposes of authentication and protection of your Personal Information when you access the Website electronically.

4.3.3 The general information we gather enables us to serve our customers better by continually enhancing the Accountability Website based on up-to-date use patterns.



4.3.4 We are provided anonymous information collected from other websites on which we display advertisements. This information enables us to understand how visitors to the Accountability Website, who were exposed to the advertisements we have placed on those other websites, interact with the Accountability Website.

4.3.5 We may use this information to enhance or modify our campaigns that are designed to bring web visitors to the Accountability Website.

4.3.6 You may opt-out of this anonymous data collection and sharing activity by visiting the Google Analytics Privacy Overview web page and following the procedures noted under the Browser Opt-Out and Privacy Centre information sections (search for these websites through www.google.com).

4.4 Behavioural Data

4.4.1 Behavioural data is the information that Accountability will use to serve you with personalized offers of Accountability and our trusted partners. This data includes your interaction with our Products and Services on the Accountability Website, including but not limited to information searched, transactions conducted, purchase history etc.

4.4.2 The information Accountability gathers is for the purpose of enhancing the relevancy of the personalized offers. All this data will be kept in our secure server and no Personal Information will be transferred to any third parties.

4.5 Marketing Data

4.5.1 The information we collect for our Digital Marketing is segregated from Consumer Credit Information. Marketing Data may include information on consumers, households, and businesses as well as non-personal aggregated information and advertising program performance data. This type of data is shared only with the various Credit Bureaus and can only be accessed directly from our servers by registered Accountability Members who already have the data in their possession.



4.5.2 Marketing Data includes information about you, such as demographics, life events, public records, or firmographics. Demographic data includes information such as age, gender, income, occupation, education, and marital status. Life events data includes information such as a recent move or home purchase. It consists only of data expressly permitted in terms of Section 70(1) of the NCA.

4.6 Public records data

Such information includes summarized census data, geographic data, and property data from local tax assessors, and recorded deed information.

4.7 Firmographic data

Such information includes the type of business, years in business, size of business, and job titles.

Use and Disclosure of Personal Information

5.1 Accountability limits the use and disclosure of Personal Information to include only what is permitted and prescribed in terms of the NCA, POPIA, or any other applicable laws or in instances where consumers have consented to such collection, use and disclosure.

5.2 Confidentiality of your Personal Information is compulsory under the provisions of the NCA. Your Personal Information will not be shared with any party in ways unrelated to the circumstances described in this Privacy Policy and to which they are not entitled to in terms of existing legislation, being either POPIA, the NCA, the PAIA, or any other law which may find application.

5.3 We do not require any of your Personal Information concerning religious, or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, or biometric information. Accordingly, this category of information is not available to us.



5.4 We specifically use and disclose information in the following circumstances:

5.4.1 Credit Reporting

5.4.1.1 The various Credit Bureaus with whom Accountability have entered into channel partner agreements and to whom our data is supplied will compile your Consumer Credit Information contained in your credit report from applications that you have made to, for example, Credit providers or service providers for credit or services.

5.4.1.2 Accountability itself does not apply any algorithms to your personal data and does not interpret any of your personal credit behaviour in any manner:

This function is the prerogative of registered Credit Bureaus from whom we draw consumer credit reports. The only additions made by Accountability to consumer credit reports, is that we apply our branding to the reports and this is done with the full knowledge and approval of the various Bureaus.

5.4.1.3 The following Consumer Credit Information is included in your credit report (Section 70(1)(a)-(d) of the NCA), which may be supplied to our Members via our Website:

5.4.1.3.1 Identifying information, such as first name, surname, ID number, physical and postal address, contact numbers, marital status, spouse details, and current employer and occupation;

5.4.1.3.2 Account History or Payment Profile: Your account history or payment profile is a 24-month record of all your accounts with credit or service providers and a history of how you pay these accounts on a monthly basis;



- 5.4.1.3.3 Enquiries: a list of credit or service providers authorized by yourself or permitted in terms of the NCA to receive your credit report;
 - 5.4.1.3.4 Public Records: Information that is publicly available as permitted by law such as judgements, administration orders, sequestrations, and rehabilitation;
 - 5.4.1.3.5 Default Data: a default is recorded on your credit profile when you fail to make the payment of money owed. Default data is submitted by the creditor service providers to the Credit Bureaus; and
 - 5.4.1.3.6 Any other information that is permitted to be included under the NCA.
- 5.4.1.4 Information of the following nature is not included in your credit report:
- 5.4.1.4.1 race, creed, colour, ancestry, ethnicity, religion, sexual orientation or political affiliations;
 - 5.4.1.4.2 your medical history or status; or
 - 5.4.1.4.3 major purchases paid in full with cash or cheques.
 - 5.4.1.4.4 In the majority of instances, Accountability is not capable of being provided with direct consent by consumers. Such consent is directly provided by consumers to our data suppliers (Members). Accountability however takes all reasonable measures to ensure that all data suppliers (Members) are contractually bound to ensure that all legally required consents are obtained prior to accessing any Consumer Credit Information contained in our credit reports.



5.4.2 With Regards to Consumers

5.4.2.1 Accountability does not offer access to our Member portal to the general public. Such access is limited to registered Members. We will not collect any Personal Information on you while you visit the Accountability Website. On the publicly visible Website, a Zendesk™ chat function is available to any person wishing to enquire or make direct contact with Accountability. This function does not collect any Personal Information other than those specified above under Section 4.2.

5.4.2.2 With regard to the “Contact Us” function, on our Website, no Personal Information is captured or stored, other than the consumer’s name and surname, email address, and contact telephone number. This information is not shared with any other party. Our third-party email processor administrator is not authorized to use any such information for any other purpose. If you decide to register for emails, you may opt-out from receiving such communications, at any time. If you wish to opt-out, please contact us at 0861 909 090. If you do not provide us with your consent, some features on the Accountability Website may not be available to you.

5.4.3 Accountability Customer Service

To provide customer service to you, we may use your Personal Information:

5.4.3.1 to identify you. In order to process your transactions and provide you with quality customer service, we need your full name and current and/or billing address, your email address, mobile telephone number, so we can contact and authenticate you and, if you purchase one of our products or services, a valid credit card number or banking details, your identity number, and certain other Personal Information and Consumer Credit Information, such as your

date of birth, address information, employment information, and certain credit card and loan account information. We use such information to verify and authenticate the credit card number and to confirm that the person requesting your Personal Information or credit report really is you and not any other person improperly seeking to access your information;

5.4.3.2 where applicable, to create a user account (login user name and password);

5.4.3.3 to fulfil your requests for any information which you're entitled to request and access;

5.4.3.4 to provide service and support;

5.4.3.5 to help us develop, deliver, and improve our products, services, content, and advertising;

5.4.3.6 to send important communications regarding any purchases or changes to the terms and conditions and/or to advise you of any other important circumstances;

5.4.3.7 for internal purposes such as auditing, data analysis, and research to improve Accountability's products, services, and customer communications; and

5.4.3.8 for purposes of any Accountability's promotional competitions.

5.4.4 Direct Marketing and Digital Marketing

Accountability does not market directly to members of the general public. Our market is limited to registered commercial entities inclusive of sole proprietors.



5.4.5 Compliance with laws and regulations

We may only access, use and/or disclose your Personal Information without your consent in exceptional circumstances. These include circumstances where we believe such action is necessary to:

- 5.4.5.1 comply with the law or legal process served on us;
- 5.4.5.2 comply with requests for information from SAPS or government authorities;
- 5.4.5.3 protect and defend our rights or property (including the enforcement of our agreements);
- 5.4.5.4 protect the public interest;
- 5.4.5.5 act in urgent circumstances to protect the personal safety of our employees or members of the public;
- 5.4.5.6 where applicable, with your implied consent; and
- 5.4.5.7 to the extent permitted or required in terms of the NCA, POPIA, and other relevant national legislation.

5.4.6 Recruitment

When you submit an application for employment, we use your Personal Information for recruitment purposes only.

Retention of Your Information

- 6.1 We retain your Personal Information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws and your consent to such purpose(s) remains valid after termination of our relationship with you.



6.2 Furthermore, Credit Bureaus retain your Consumer Credit Information in their credit information database in accordance with the data retention periods prescribed by the NCA and in Regulation 17 of the National Credit Regulations. Accountability itself does not maintain a database of Consumer Credit Information that can be accessed by members of the general public. Any such information stored on our servers can only be accessed by the specific registered subscriber who submitted the information initially.

Transfer of Personal Information Outside the RSA

7.1 Unless obliged to do so under the law or your consent is obtained, Accountability will not transfer your Personal Information outside the Republic of South Africa.

Your Rights and Participation

8.1 Accountability aims to ensure that your Personal Information is accurately recorded. To be able to achieve this, we adhere to processes that help ensure and maintain data accuracy. We provide individuals with reasonable access to review and correct their Personal Information, as detailed on our Website.

8.2 When gathering your Consumer Credit Information, Accountability works with our Members to increase their awareness of the importance of providing only Consumer Credit Information that is accurate, complete, and up to date. Accountability however, cannot alter the information reported by Members, unless the information is determined to be wrong, incomplete or inaccurate. If you do not agree with the accuracy of the information that any one or more of Accountability's channel partner Credit Bureaus have on file, you have the right, in terms of Section 72 of the NCA, to challenge the accuracy of such information directly with the Credit Bureau(s).



8.3 Unless otherwise provided in any laws, you have the right to access, update, correct or object to processing your Personal Information. To do so you may contact us on:

Deputy Information Officers: Louis du Plessis / Ludwig Harvey
Compliance Officers for Accountability;
E-mail: disputes@accountability.co.za /
ludwig@accountability.co.za
Post: PO Box 1087 Brackenfell, 7561 or
Phone: 0861 909 090

You have the right to lodge a complaint to the Information Regulator:

E-mail: infoereg@justice.gov.za
Post: SALU Building, 316 Thabo Sehume Street,
PRETORIA; or
Phone: 012 406 4818; or
Fax: 086 500 3351

Security of Your Information

9.1 Accountability takes security and the protection of Personal Information and Consumer Credit Information seriously. We maintain physical, technical, and organizational safeguards to protect any data that we receive and disseminate. We have adopted procedures to secure the storage of Personal Information and are committed to working with our data suppliers to protect the security of Personal Information during any transfer to or from us. Moreover, we have also instituted a number of safeguarding procedures to identify and help prevent the fraudulent use of Consumer Credit information.



9.2 Your Personal Information is only accessible to Accountability employees or Members for business purposes and on a strict need-to-know basis. For security purposes, we then move all of the Personal Information that we obtain about you, including your credit report, to an environment on our proprietary network that has controls in place to limit access to and secure the data maintained therein.

9.3 On the Accountability Website, we take precautions to secure your Personal Information. If and when we ask you to provide your Personal Information, we will do so through a web page that uses the industry-standard secure transport protocol. This protocol provides added security by encrypting the information.

9.4 To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to, or making alterations to data we maintain.

Children's Privacy

10.1 No data relating to children under the legal age to contract, being 18 years, is received or stored on Accountability's system.

Third-Party Websites

11.1 The Accountability Website may offer links to third-party websites including payment gateways for credit card payment. You should be aware that operators of linked websites may also collect your Personal Information (including information generated through the use of cookies) when you link to their websites.

11.2 Accountability is not responsible for how such parties collect, use or disclose your information and it is important for you to familiarize yourself with their privacy policies before providing them with your Personal Information.



Compliance and Enforcement Of this Privacy Policy

- 12.1 Our compliance with this Privacy Policy will be monitored on a regular basis.
- 12.2 Accountability reserves the right to modify this Privacy Policy. The Privacy Policy posted at any time via the Accountability Website shall be deemed to be the Privacy Policy then in effect.
- 12.3 Consumers are welcome to contact Accountability should they require more information or have any questions. Should you have any queries with regards to our Privacy Policy, or the manner in which your Personal Information is treated, we encourage you to direct any such queries or concerns to Accountability by contacting us at the following email addresses disputes@accountability.co.za / ludwig@accountability.co.za . We will ensure you are contacted as soon as reasonably possible in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Privacy Policy, by the Information Officer/s or by a delegated Client Service Agent.