

PRIVACY NOTICE

1. Introduction

Transaction Capital Recoveries ('We', 'us' and 'our') cares about the privacy, security and safety of our customers' ('you' and 'your') personal information. We take our responsibility to protect your personal information very seriously. This Notice explains how we collect, use, share and protect your personal information, as required by the Protection of Personal Information Act (POPIA). Using our services and any disagreements about your privacy are subject to this Notice.

As our business grows and changes, we may need to update this Notice to reflect those changes. If changes affect you personally, we will try and contact you directly because it is important to us that you understand at all times how your personal information is used. Please make sure that we always have your latest contact details.

This Notice sets out how your personal information will be used by Transaction Capital Recoveries and applies to any information, including personal and special personal information, you give to us or which we may collect from third parties.

To help you understand this Notice, we include the explanations of the terms 'personal information' and 'process' as used in the Protection of Personal Information Act:

Personal Information and Special Personal Information is any information relating to an identifiable living or juristic person. Some examples are: race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

Process means any operation or activity, whether automated or not, concerning personal information, including: collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information. "Processing" will have a similar meaning.

2. How to contact us

If you have any comments or questions about this Notice please contact the us at enquiries@mbd.co.za

3. Amendment of this Statement

It is your responsibility to check the Transaction Capital Recoveries' website often for updates to this Notice.

4. **Privacy and indemnity**

- 4.1. Transaction Capital Recoveries takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Notice and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords are kept secure etc).
- 4.2. We have implemented reasonable technical and operational measures to keep your personal information secure.
- 4.3. You hereby indemnify and hold Transaction Capital Recoveries harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to Transaction Capital Recoveries.

5. **Information which we may collect about you**

- 5.1. We may collect the following information about you:
 - 5.1.1. your name, addresses, contact details, date of birth, identity/passport/registration number, bank details, company details, vat/tax number, credit records, account information, judgements, defaults and financial information
 - 5.1.2. records of correspondence or enquiries from you or anyone acting on your behalf;
 - 5.1.3. details of any contracts and transactions;
 - 5.1.4. sensitive or special categories of personal information
- 5.2. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Notice.

6. **How we collect information**

- 6.1. You may provide personal information to us either directly or indirectly (via third parties) by/when using our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.
- 6.2. We may also collect your personal information from our group entities and its partners, credit providers, service providers, vendors, Operators, bureaus, or other third parties that may hold such information.
- 6.3 Some information is automatically collected:

When you use any of our digital channels like websites and apps, we receive and store information generated by your activities (usage data gathered by cookies) and other information that are automatically collected from your browser or mobile device. Cookies help us learn how well our site, services and tools perform in different locations. We also use cookies to understand, improve, and research products, features, and services, including when you access Transaction Capital Recoveries from other websites, applications, or devices such as your work computer or your mobile device. Most of this data is generally not personally identifiable. However, some of this data, either alone or when linked with other information, may allow your identity to be discovered. We treat this combined data as personal information and we protect it accordingly.

6.3.1 Cookies are small text files that are created when you view a website. They gather usage data which includes information about the sites you visited, the number of times you visit, the date, time and length of your visit, which products or services you viewed and which areas of the site you visited. We may assign you one or more unique identifiers to help keep track of your future visits. We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the content that has been delivered to you, such as whether you have clicked on a link.

6.3.2 Other information automatically collected may include your IP address, preferred language, geographic location, operating system and computer platform.

7. Use of information collected

- 7.1. We may use, transfer, share and disclose your personal information for the purposes of:
- 7.1.1. providing you with the services, products or offerings you have requested, and keeping you informed;
 - 7.1.2. enriching the accuracy and quality of our data;
 - 7.1.3. managing your account or contract/relationship with us;
 - 7.1.4. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 7.1.5. assessing and dealing with complaints and requests;
 - 7.1.6. operational, marketing, auditing, legal and record keeping requirements;
 - 7.1.7. identifying you, verifying your identity or the identify of your beneficial owner;
 - 7.1.8. transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including the use of any of our websites;

- 7.1.9. complying with applicable laws, including lawful requests for information received from law enforcement, bureaus, government and tax collection agencies;
- 7.1.10. recording and/or monitoring your telephone calls and electronic communications to/with Transaction Capital Recoveries in order to process instructions and requests;
- 7.1.11. conducting market research and providing you with information about Transaction Capital Recoveries' products or services from time to time via our website, email, telephone or other means;
- 7.1.12. disclosing your personal information to third parties for reasons set out in this Notice or where it is not unlawful to do so;
- 7.1.13. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from Transaction Capital Recoveries or any of its employees, agents or contractors, including monitoring, recording and using as evidence all communications between you and Transaction Capital Recoveries;
- 7.1.14. create valuation models;
- 7.1.15. debt collection and related purposes;
- 7.1.16. statistical, historical and research purposes;
- 7.1.17. data analytics and
- 7.1.18. tracing

7.2 We may from time to time (and at any time) contact you about services, products and offerings available from Transaction Capital Recoveries or specific group subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by clicking here:

<https://unsub.tcmail.co.za/unsubscribe/check/>

8. **Disclosure of your information**

Your personal information may be shared with other entities in the Transaction Capital Risk Services group, our agents and sub-contractors, partners, vendors and selected third parties, including credit providers, credit bureaus, debt collectors, and service providers who process the information on our behalf for the purposes set-out in 7 above.

9. **Retention of your information**

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of applicable laws. However, as a general rule, we will retain your information in accordance with retention periods set out in applicable laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings, statistical, historical or research purposes)

10. **Access to, correction and deletion of your personal information**

10.1. You may request details of personal information which we hold about you under the Protection of Personal Information Act, 2013 (“**POPIA**”). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of the Promotion of Access to Information Act, 2000 (“**PAIA**”). Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Transaction Capital Recoveries, please review our PAIA Manual located on our website.

10.2. You may request the correction of personal information Transaction Capital Recoveries holds about you. Please ensure that the information we hold about you is complete, accurate and up to date.

10.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

10.4. You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

11. **Complaints**

11.1. Should you believe that Transaction Capital Recoveries has utilised your personal information contrary to applicable laws, you undertake to first attempt to resolve any concerns with us.

11.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

11.2.1. Tel: 012 406 4818

11.2.2. Fax: 086 500 3351

11.2.3. Email: infoREG@justice.gov.za