

# Impact SHERQ (Pty) Ltd Privacy Policy

## June 2021

"Impact SHERQ" refers to Impact SHERQ (Pty) Ltd.

This Policy explains how we obtain, use and disclose the Customer's personal information, in accordance with the requirements of the Protection of Personal Information Act, Act No. 4 of 2013 ("POPIA").

At Impact SHERQ Pty Ltd (and including this website, POPI Act-Compliance) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

This policy scope extent to the following but not limited to: Employees, Contractors, Clients, Suppliers, Vendors and Statutory Bodies i.e. SARS

### ***Your privacy is very important to us***

Protecting your privacy is very important to us and we are committed to keeping all the information you share with us safe and secure, in accordance with the very latest legislation. To understand more how we protect your privacy, please read further:

### ***What is your personal information?***

We need certain information from you so we can provide services evidence of our services to you. Personal information includes any personal information that is specified under the Protection of Personal Information Act 4 of 2013. This policy applies whenever we process the personal information of a person visiting any of our social media platforms or in person while training auditing consulting or communicating with us through any of our communication channels like email or by calling our customer service agents.

It also applies if you are a third-party and we process your information as a result of your relationship with our customer, for example if you are a beneficiary under a policy of our customer.

We may amend this policy from time to time, in line with changes required by legislation or our business. You must therefore review the policy whenever you visit any of our channels for any such changes. The amended version shall supersede and replace all previous versions. By entering into any agreement with us, or by applying to enter any such agreement, or by using our website, or any other Impact SHERQ platform you agree to the terms of this policy.

### ***What is the Protection of Personal Information Act and how does it protect you?***

the Protection of Personal Information Act 4 of 2013 ("**POPI**") is aimed at protecting all your personal information and tells us what we must and must not do with it. POPI ensures that we always handle your personal information responsibly, in a way that protects you and your privacy.

In addition to POPI, Impact SHERQ also complies with all other legislation that applies to your personal information.

### ***The type of information we collect and process***

- General personal information and contact details like name, ID numbers, address, contact numbers, email address, employment etc;
- Financial, payment, banking and account information;
- Demographic information – information about where you live
- Credit bureau and fraud;
- Cookies and device information like browser settings, IP address, time of logging on etc;
- Advertising and online information like your interactions with websites and platforms where we advertise our services;
- Payment behaviour;
- Your views, opinions preferences; and
- Consent records
- Name
- Surname
- Address
- Contact Details
- All labour related information
- All client information relating to accounting, products, services in common
- All vendor information relating to accounting, products, services in common
- Information stakeholders could be interested in
- Information governing bodies could be interested in
- All Statutory information on which the Company is to report / act upon
- Information destined for marketing and sales in future

### ***Collecting your information***

We collect information about you in the following ways:

#### **Head Office: South Africa**

Route 21 Corporate Park  
63 Regency Drive, Irene. Centurion

#### **Namibia**

Hochlandpark,,Pelican Street 8  
Windhoek,

#### **Botswana**

International Commercial Park  
Gaborone, Botswana

- Directly if you provide it to us through any communication with us or via any Impact SHERQ channel, including but not limited to our electronic channels, applications, our website or calls;
- From third party sources with whom we have contractual relationships to regulate the use of the information. These include credit bureaus, fraud agencies, verification companies, and business affiliates;
- Public sources, including social media; and
- Cookies

### ***Personal information about children and special/sensitive personal information***

Impact SHERQ will only process information about children with the consent of a competent person (someone like the parent or guardian) or if an applicable law otherwise allows it. We do not intend to use any 'special/sensitive personal information as defined in the applicable laws.

### ***What we use your information for***

We use your information for the following purposes:

- Credit and fraud checks
- To determine your internal credit score with us, including receiving and considering information from the credit bureau
- To perform our duties in terms of any agreement with you;
- To make, or assist in making, credit decisions about you and to verify the details that you have provided to us;
- To operate and manage your account and manage any application, agreement or correspondence with us;
- To manage any benefits you may receive as a result of an agreement between us and a customer;
- To carry out, monitor and analyse our business;
- Linking all information about you available within Impact SHERQ to use it for legitimate business purposes, including but not limited to updating records, debt collection, making marketing selections and contacting you;
- To contact you as allowed for in law by email, SMS, letter, telephone or in any other way about our services, or a third party's products or services that may interest you, unless you tell us that you do not want to receive these marketing communications;
- Detect or prevent fraud and money laundering;
- Form a view of you as an individual and to identify, develop or improve products that may interest you;
- Market research, business analysis and the building of marketing or credit models;

- Data science, modelling, statistical and analytical purposes,
- Audits;
- Perform other administrative and operational processes including the testing of systems;
- To trace you (for debt collections and/or as otherwise required in pursuing our legitimate interests or legal rights);
- Recover any debt you owe us and/or for the purposes of on selling debt to a third-party;
- Comply with our regulatory or other legal obligations;
- Carry out any other reasonable business operation considering our legitimate business interests and our relationship with you; and
- Your information may also be used for other purposes for which you give your permission or where the law allows us to use it.

#### ***How we keep your information secure***

We are committed to protecting your personal information and will take all reasonable internal technical and organisational security measures to prevent the loss of, damage or unauthorised access to and the unauthorised disclosure, modification or destruction of your personal information. We also have physical and electronic access controls to our buildings and only authorise access to information to those employees who require it to fulfil their designated responsibilities.

#### ***How you can help keep your information secure***

If you choose to send us information online (via the internet), it is done so at your own risk. The transfer of information via the internet is not completely secure, so it is important that when entering your personal information via the internet, it is your responsibility to ensure that you always use a secure and trusted internet connection, a secure computer or other electronic device. When you use our electronic channels for transactions, you may be given an access number, username, password and/or personal identification number (PIN). You are responsible to keep all of this information safe and confidential.

#### ***How long we keep information***

We retain personal information in accordance with the required retention periods in law or for legitimate business purposes. We will only retain your personal information for the purposes explicitly set out in this policy. We may keep personal information indefinitely in a de-identified format for statistical purposes.

#### ***Information we share***

We will keep your personal information confidential and only share it for purposes set out in this policy, if you have consented thereto, or if we have a legal right or obligation to share it.

We have trusted relationships with third parties who provide services to us or on our behalf. We will share information with them on a need-to-know basis and subject to a contract to maintain the security and confidentiality of your personal information and to use it for our specified purposes only.

In addition, we may share information with the following parties:

- Debt collectors;
- Debt counsellors and payment distribution agencies for purposes relating to the credit agreement, including refunds to be processed;
- Payment system service providers;
- Regulatory and governmental authorities, ombudsmen, or other authorities, including tax authorities;
- Fraud prevention agencies or third-party fraud prevention applications;
- Other companies within the Impact SHERQ circle, to prepare offers and market to you and for other legitimate business purposes, like providing services to companies within the group or for retention purposes;
- Affiliates with whom you also hold a relationship, mostly to confirm details around your engagement with us;
- Any third party to whom we sell or transfer a portion of our business; and
- Any other third party if we are allowed to do so in law.

### ***Breach***

We will report any security breach to both the Information Regulator and the individuals or companies involved. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your personal information, kindly notify us by sending an email to [info@impactsherq.com](mailto:info@impactsherq.com) or calling us at

+27 73 972 2293 | +27 84 549 3906

### ***Third-party links on our channels or platforms***

The Impact SHERQ channels, platforms and our correspondence with you may include links to other apps or third-party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these third-party sites, but we may display these links in order to make it easier for you to find information about specific subjects, products or services. Your use of and reliance on any third-party links is at your own risk.

### *Your legal rights*

You have certain rights in relation to your personal information. As available and except as limited by POPI and the South African DPA, you have the following rights in respect of your personal information:

- **Right of access:** the right to be informed of and request access to the personal information that we process about you;
- **Right to rectification:** you may request that your personal information be amended or updated where it is inaccurate or incomplete;
- **Right to erasure** the right to request that we delete your personal information, subject to applicable limitations and exceptions;
- **Right to restrict processing:** you may request that we temporarily or permanently stop processing your personal information;
- **Right to object:** you may object to us processing your personal information, including to object to your personal information being processed for direct marketing purposes or in terms of;
- **Right not to be subject to automated decision-making:** where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may, subject to certain exceptions, or request that your personal information not be processed in that manner.

Where you have previously provided consent for us to process your personal information, you may also withdraw your consent. However, we may continue to process or store your personal information if another legal justification exists for the processing or storage.

### *Quality and access to your information*

Quality: we want to ensure that your personal information is accurate and up to date. You may ask us to correct or remove any personal information that you think is inaccurate, by sending us an email at [info@impactsherq.com](mailto:info@impactsherq.com) or calling our information officers at

+27 73 972 2293 | +27 84 549 3906. Please also inform us promptly of any updates to your personal information.

Access: you have the right to request that we provide you with the personal information that we hold about you. You must contact us directly to do so via the channels mentioned above. This request may be subject to an access to information request in terms of applicable laws and may require you to verify your identity, identify the rights you are wishing to exercise and pay a fee.

The right to access your personal information may further be limited in terms of applicable law.

### ***Direct Marketing***

If you qualify as a customer of any of Impact SHERQ (Pty Ltd or we obtained your details in the context of a sale, we will market to you unless you opt out. We believe our offering will benefit our customers. Where we believe that third-party products affiliated with the group may interest you, we will also market these third-party products to you. You can always opt out from these. We will never sell your information to third-parties for marketing purposes.

### ***Automated decisions***

Some marketing and credit risk decisions are done solely through automated processes. In instances where these may have a legal impact or affect you significantly, we implement adequate measures to protect your legitimate interests.

### ***Cookies***

We make use of cookies as regulated in our cookie policy.

### ***Cross-border flow of information***

We may transfer your personal information to foreign countries mainly for the business purposes of the interested parties within the Impact SHERQ, for retention or if our service providers are cross border or make use of cross border systems. If you continue to use our website or apply to or enter into an agreement with us, you expressly agree that we may transfer the personal information cross border for these purposes. We will only share information cross border to recipients who are subject to international laws that similar to the applicable South African laws (POPI), or who have entered into an agreement with us to include the relevant POPI principles.

### ***Your right to object***

You may, on reasonable grounds, object to us using your information. If you object, we will stop using your information, except if the law allows its continued use.

### ***How to lodge a complaint***

If you believe we are using your information unlawfully, you may lodge a complaint directly to us at:

Email: [info@impactsherq.com](mailto:info@impactsherq.com)

Contact Centre: +27 73 972 2293 | +27 84 549 3906.

Alternatively, you may lodge a complaint to the Information Regulator at:

South Africa: The Information Regulator

Website: <https://www.justice.gov.za/infoereg/>

**Head Office: South Africa**  
Route 21 Corporate Park  
63 Regency Drive, Irene. Centurion

**Namibia**  
Hochlandpark, Pelican Street 8  
Windhoek,

**Botswana**  
International Commercial Park  
Gaborone, Botswana



Tell: (+27) 110 558 128  
Cell: (+27) 739 722 293  
Fax: (+27) 866 663 626  
[info@impactsherq.com](mailto:info@impactsherq.com)  
[sales@impactsherq.com](mailto:sales@impactsherq.com)  
[www.impactsherq.com](http://www.impactsherq.com)

Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Contact number: 012 406 4818

Fax number: 086 500 3351

Email: [info@justice.gov.za](mailto:info@justice.gov.za)

***We will stay updated to protect your information***

If you have any questions about it or do not agree with it, please contact us directly at [info@impactsherq.com](mailto:info@impactsherq.com) or by calling us at +27 73 972 2293 | +27 84 549 3906.

---

**Head Office: South Africa**

Route 21 Corporate Park  
63 Regency Drive, Irene. Centurion

**Namibia**

Hochlandpark,,Pelican Street 8  
Windhoek,

**Botswana**

International Commercial Park  
Gaborone, Botswana