



# Privacy Policy

## DIGITAL CREDIT SYSTEMS (PTY) LIMITED ("DCS")

Digital Credit Systems (Pty) Limited ("DCS") provides Software as a Service (SAAS) and strives to protect your privacy and to ensure that your personal information and/or the personal information in respect of your Buyers is collected and used properly, lawfully and transparently. This Privacy Policy therefore regulates the manner in which we collect, use, process, disclose, transfer or retain all personal information.

We comply with the National Credit Act, 2005 (No.34 of 2005) ("NCA"), the Protection of Personal Information Act, 2013 (No. 4 of 2013) ("POPIA") and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No.25 of 2002) which govern your right to having your personal information kept private of which these principles are covered in this Privacy Policy.

This Privacy Policy is to be read in conjunction with DCS's Terms and Conditions as reflected in our websites ([www.digitalcredit.co.za](http://www.digitalcredit.co.za) and [www.mycreditmanager.co.za](http://www.mycreditmanager.co.za)), and as it relates to our "My Credit Manager for Business" product in the DCS websites.

For the purpose of this Privacy Policy, "Consumer Credit Information" means consumer credit information as defined in Section 70 of the NCA; and "Personal Information" means personal information as defined in Section 1 of the POPI Act. You may be asked to provide your Personal Information, and/or your Buyers Personal Information, when contracting with DCS, registering, accessing, or using any Services and Products in the DCS websites.

In terms of the POPI Act, Personal Information is data that can be used to identify a person. It is defined as "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person."

This information about a person includes, but is not limited to:

- Race
- Gender
- Sex
- Pregnancy
- Marital status
- National / ethnic / social origin
- Colour
- Sexual orientation
- Age
- Physical or mental health

- Disability
- Religion / beliefs / culture
- Language
- Educational / medical / financial / criminal or employment history
- ID number
- Email address
- Physical address
- Telephone number
- Location
- Biometric information
- Personal opinions, views or preferences

## USE OF YOUR PERSONAL INFORMATION

DCS 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.

We will use your Personal Information, and/or the Personal Information in respect of your Buyers, ***only for the purposes for which it was collected or agreed with you***, or as defined in our Terms and Conditions, for example:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship;
- To process Credit reference searches or verification;
- To confirm and verify your identity or to verify that you are an authorised User for security purposes;
- For operational purposes, and where applicable, credit scoring and risk assessment, credit management, credit insurance, and default listing;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- For debt tracing or debt recovery;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

We will also use your Personal Information, and/or Personal Information in respect of your Buyers, to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law (for example to protect DCS's interests).

## DISCLOSURE OF INFORMATION

We may disclose your Personal Information, and/or the Personal Information in respect of your Buyers to our service providers who are involved in the delivery of products or services to you, and who are essential for the performance of the requested service.

Therefore, we may share your Personal Information, and/or the Personal Information in respect of your Buyers with:

- Third parties for the purposes listed above in the Use of your Personal Information, for example credit reference bureaus and fraud prevention agencies, law enforcement agencies;
- Furthermore, we may also disclose your information:
  - Where we have a duty or a right to disclose in terms of law or industry codes;
  - Where we believe it is necessary to protect our rights.

## **INTERNET INFORMATION**

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

When you visit and use any Products or functions in our websites, we may collect the behavioural data and general internet data, including your internet protocol ("IP") address, metadata, location data, and the date and time you visit.

## **SECURITY OF YOUR INFORMATION AND DATA PROTECTION**

DCS 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 collect and/or store on your behalf. We have adopted procedures to secure storage of Personal Information and Personal Information in respect of your Buyers, and are committed to working with our clients and data suppliers to protect the security of all Personal Information during any transfer to or from us. Moreover, we have also instituted a number of safeguards to identify and help prevent the fraudulent use of Consumer Credit information. Furthermore, your Personal Information, and personal information in respect of your Buyers, is only accessible to those DCS employee members, agents or contractors for business purposes, and on a strictly need to know basis only.

In our websites, we takes precautions to secure your Personal Information and the Personal information in respect of your Buyers. If and when we ask you to provide Personal Information, we will do so through a Web page that uses the industry standard secure transport protocol. This protocol provides security for your information by encrypting it as it travels from your computer to our database.

## **RETENTION OF YOUR INFORMATION**

We retain 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.

## **TRANSFER OF PERSONAL INFORMATION OUTSIDE**

Unless permitted under the law, or unless your consent is obtained, DCS will not transfer your Personal Information outside the Republic of South Africa.

### **THIRD PARTY SITES**

Our websites may offer links to third party web sites including Trade Credit Insurers and Trade Financiers. You should be aware that operators of linked web sites may also collect your Personal Information (including information generated through the use of cookies) when you link to their web sites.

DCS 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**

Our compliance with this Privacy Policy will be monitored on a regular basis. DCS reserves the right to modify this Privacy Policy. The Privacy Policy posted at any time via our websites shall be deemed to be the Privacy Policy then in effect.

Consumers are welcome to contact DCS 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 DCS by contacting us at the following email address [info@digitalcredit.co.za](mailto:info@digitalcredit.co.za). We will ensure you are contacted without delay 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.