



## Sebenza Nawe – Privacy Policy

### 1. Introduction

- 1.1. Sebenza Nawe (Pty) Ltd is committed to business practices in compliance with the Protection of Personal Information Act and in line with acceptable industry standards.
- 1.2. This privacy policy explains how Sebenza Nawe may collect and use your personal information, including:
  - 1.2.1. How we will collect and use it
  - 1.2.2. When and with whom we will share it
  - 1.2.3. What your rights are and how you may complain

### 2. Definitions

- 2.1. “Act” means the Protection of Personal Information Act 4 of 2013;
- 2.2. “Sebenza Nawe” or “we” or “us” refers to Sebenza Nawe (Pty) Limited
- 2.3. “personal information” includes any personal information as defined in the Protection of Personal Information Act;
- 2.4. “website” means the websites located at:
  - [www.sebenza.nawe.co.za](http://www.sebenza.nawe.co.za)
- 2.5. “you” or “your” refers to the user of the websites or user of any service or product made available through the websites.

### 3. Personal information about children and special personal information

- 3.1. Sebenza Nawe will not intentionally collect information about children. If you are under the age of 18, you may not use this website or any services or products that we provide through the website without the knowledge and consent of your parent or guardian.
- 3.2. If you provide any information about children to us, you warrant that you are a competent person in terms of the Act and you agree that we may process the child’s personal information in accordance with this policy.
- 3.3. If you provide any information to us that qualifies as “special personal information” in terms of the Act (these include for example things like information about health, race, trade union membership), you expressly agree that we may process the information in accordance with this policy.

#### 4. Collecting personal information

4.1. We will collect your personal information if:

4.1.1. you register for any service or product that we provide;

4.1.2. you provide any information to us online;

4.1.3. you participate in any marketing campaigns by us or selected third parties.

4.2. We may collect personal information about you when you visit our website, mobile sites or any of our social media platform pages. This collection will happen automatically through the use of cookies (a cookie is a small piece of information stored by your browser, typically used to identify returning visitors, and to collect aggregate information on the number of visitors to a site and the number of pages viewed, but you can set your browser to prevent this if you want to).

4.3. We may collect personal information from third parties where our legitimate business interests require and allow collection from a third party.

#### 5. Using your personal information

5.1. We will use your personal information for our legitimate business purposes or for reasons where we obtained your consent to use it or you required us to use it.

5.2. If we want to use your personal information for any other reason, we will firstly notify you.

5.3. By way of example personal information will be used for the following:

- providing products or services to you;
- contractual requirements
- providing information to you;
- research and development of new products or services;
- formulating policies;
- marketing, including direct marketing through all channels as far as the law permits;
- providing proof of any communications between you and Sebenza Nawe;
- collections;
- litigation;
- complaints;
- termination of agreement;

- systems maintenance and other administrative and operational actions;
- internal and external reporting;
- statistical analysis;
- requirements by law;
- reasonable business requirements;
- third party product or service offerings that may interest you;
- sharing information with third parties in terms of paragraph 6;
- other reasonable business purposes;
- other purposes specified from time to time.

## 6. Sharing information with third parties

- 6.1. We will process and share your personal information with third parties where (i) you have agreed to it, (ii) we are permitted or required to do so by law, (iii) processing is necessary to protect the legitimate rights or interests of Sebenza Nawe or a third party, (iv) processing is necessary to conclude a contract with you.
- 6.2. We are a leads provider and share information with third parties for purposes of direct marketing products or services, collections, and tracing.
- 6.3. We may also share your personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates for the following purposes:
  - 6.3.1. Marketing;
  - 6.3.2. Enforcing the law;
  - 6.3.3. Enforcing an agreement where you are a party to the agreement;
  - 6.3.4. Protecting our rights;
  - 6.3.5. A change in ownership;
  - 6.3.6. Complaints investigation.
- 6.4. If we make use of third party service providers to provide products or services to you or to provide products or services on our behalf, we may need to share your personal information with them. In these instances we will regulate these relationships with third party service providers contractually to ensure that they process your personal information according to the law. Third party service providers may only use your personal information directly for the purposes for which we provided it to them.

7. Transferring personal information cross border

7.1. You agree that we may transfer your personal information cross border if our business interests require trans-border flow of information. This may typically happen where we have decided to store information with a trusted third party in another country.

8. Retention

8.1. We will retain your personal information as required by law and for as long as necessary considering the purpose for which it was collected.

8.2. Where we collect information for marketing purposes, we will retain the information for future marketing activities unless you object to the processing of your personal information for this purpose.

9. Security

9.1. We undertakes to implement all reasonable measures to ensure the security and confidentiality of your personal information.

9.2. In the event of a security breach, we will inform you by contacting you on the contact details we have available, by press release, or by any other reasonably suitable method.

10. Your rights

10.1. You have the right to access certain records that we hold on you. If you apply in writing to receive a copy of the personal information that we hold, we will implement security and verification procedures to ensure that we provide the record to the correct person. We may be allowed in law to charge a fee for this and may refuse the information on certain grounds as allowed in law.

10.2. You may at any time request that we update or correct your personal information by contacting [info@sebenzanawe.co.za](mailto:info@sebenzanawe.co.za).

10.3. If you believe that we have breached this policy, you can lodge a complaint to [info@sebenzanawe.co.za](mailto:info@sebenzanawe.co.za). We will investigate the matter and may use third party advisors during this process. You can also complain to the Information Regulator (once established in terms of the Act).



**sebenza nawe**

**Debt Recovery Solutions | [www.sebenzanawe.co.za](http://www.sebenzanawe.co.za)**

Blake House, 32 Flanders Drive, Mount Edgecombe, 4302, KwaZulu-Natal, South Africa | Private Bag X27, Umhlanga Rocks, 4320  
Tel: +27 31 538 4000 Fax: +27 31 538 4040 Email: [info@sebenzanawe.co.za](mailto:info@sebenzanawe.co.za)

Executive Directors: D.C Holding, C.C Bramiah | Sebenza Nawe (Pty) Ltd - Reg No. 2018/210729/07