

Privacy Policy

1. Introduction

- 1.1. Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information. As a general rule we will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract.
- 1.2. We may combine this personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- 1.3. If you use our other services, goods, products and service channels you agree that we may process this personal information as explained under this Privacy Policy. Sometimes you may provide us with consent to process this personal information.
- 1.4. If the GTC Group processes personal information for another party under a contract or a mandate, the other party’s privacy policy will apply to the processing of such information.
- 1.5. The GTC Group can change this Privacy Policy from time to time if the law or our business practices requires such change.
- 1.6. This policy establishes a general standard for the appropriate protection of personal information (POPI) within the GTC environment furthermore, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

2. Scope

- 2.1. All employees, contractors, consultants, temporary and other workers in the GTC Group, including all personnel affiliated with third parties must adhere to this policy. This policy applies to information assets owned or leased by the GTC Group, or to devices that connect to the GTC Group network or reside at the GTC Group’s sites.

3. Policy Statement

What is personal information?

- 3.1. Personal information refers to any information that identifies you or specifically relates to you, or your employees stored or processed on The Product/s. Personal information includes, but is not limited to, the following information about you and / or your employees:
- 3.1.1. Marital status
 - 3.1.2. National origin
 - 3.1.3. Age
 - 3.1.4. Language
 - 3.1.5. Birth place
 - 3.1.6. Education
 - 3.1.7. Relevant financial history
 - 3.1.8. Identifying number (like an employee number, identity number or passport number)
 - 3.1.9. E-mail address; physical address (like residential address, work address or your physical location); telephone number
 - 3.1.10. Biometric information (like fingerprints, signature or voice)
 - 3.1.11. Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
 - 3.1.12. Physical health; mental health; well-being; disability; religion; belief; conscience; culture
 - 3.1.13. Medical history; criminal history; employment history
 - 3.1.14. Personal views, preferences and opinions
 - 3.1.15. Another's views or opinions about you
 - 3.1.16. Full names and initials Personal information includes special personal information, as explained below.

When will we process your personal information?

- 4.1. We will only process this personal information for lawful purposes relating to our business if the following applies:
 - 4.1.1. If you have consented thereto
 - 4.1.2. If a person legally authorised by you, the law or a court, has consented thereto
 - 4.1.3. If it is necessary to conclude or perform under a contract we have with you
 - 4.1.4. If the law requires or permits it
 - 4.1.5. If it is required to protect or pursue your, our or a third party's legitimate interest

What is special personal information? Special personal information is personal information about the following:

- 5.1. Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded)
- 5.2. Ethnic origin
- 5.3. Trade union membership
- 5.4. Health (like where you apply for an insurance policy)
- 5.5. Biometric information (to verify your identity); and / or your criminal behaviour and alleged commission of an offense

When will we process your special personal information?

- 6.1. We may process your special personal information in the following circumstances:
 - 6.1.1. If you have consented to the processing
 - 6.1.2. If the information is being used for any Human Resource or payroll related requirement
 - 6.1.3. If the processing is needed to create, use or protect a right or obligation in law
 - 6.1.4. If the processing is for statistical or research purposes and all legal conditions are met
 - 6.1.5. If the special personal information was made public by you
 - 6.1.6. If the processing is required by law

When and from where we obtain personal information about you

- 7.1. We collect personal information from you directly.
- 7.2. We may collect personal information from a public record or if you have deliberately made the information public.
- 7.3. We collect personal information from 3rd parties that are directly integrated with our software platform
- 7.4. We collect information about you based on your use of our products, services or service channels.
- 7.5. We collect information about you based on how you engage or interact with us such as via emails, letters, telephone calls and surveys
- 7.6. We collect personal information from completed forms i.e. contact and billing information If the law requires us to do so, we will ask for your consent before collecting personal information.
- 7.7. The third parties from whom we may collect your personal information include, but are not limited to, the following:
 - 7.7.1. Our partners, your employer, employees directly, any of our other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionaries, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
 - 7.7.2. your spouse, dependents, partners, employer, and other similar sources;
 - 7.7.3. people you have authorised to share your personal information, for example a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes;
 - 7.7.4. attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
 - 7.7.5. payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, for example EFT transaction partners.

- 7.7.6. insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- 7.7.7. law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- 7.7.8. regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- 7.7.9. trustees, Executors or Curators appointed by a court of law;
- 7.7.10. our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you;
- 7.7.11. courts of law or tribunals.

Reasons for processing your personal information.

- 8.1. We will process your personal information for the following reasons:
 - 8.1.1. to provide you with products, goods and services;
 - 8.1.2. to market our products, goods and services to you;
 - 8.1.3. to respond to your enquiries and complaints;
 - 8.1.4. to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests
 - 8.1.5. to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services or to determine your credit or insurance risk
 - 8.1.6. to develop, test and improve products and services for you;
 - 8.1.7. for historical, statistical and research purposes, like market segmentation;
 - 8.1.8. to process payment instruments;
 - 8.1.9. to create, manufacture and print payment advice;
 - 8.1.10. to enable us to deliver goods, documents or notices to you;
 - 8.1.11. for security, identity verification and to check the accuracy of your personal information;

- 8.1.12. to communicate with you and carry out your instructions and requests;
- 8.1.13. for customer satisfaction surveys, promotional offerings.
- 8.1.14. to enable you to take part in and make use of value-added products and services;
- 8.1.15. to assess our lending and insurance risks; and / or
- 8.1.16. for any other related purposes.

How we use your personal information for marketing purposes

- 9.1. We will use your personal information to market our services, related products and services to you
- 9.2. We will do this in person, by post, telephone, or electronic channels such as SMS, email and fax
- 9.3. If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent
- 9.4. In all cases you can request us to stop sending marketing communications to you at any time

When, how and with whom we share your personal information

- 10.1. In general we will only share your personal information if any one or more of the following apply:
 - 10.1.1. If you have consented to this
 - 10.1.2. If it is necessary to conclude or perform under a contract we have with you
 - 10.1.3. If the law requires it; and / or
 - 10.1.4. If it's necessary to protect or pursue your, our or a third party's legitimate interestsWhere required, each member of the GTC Group may share your personal information with the following persons. These persons have an obligation to keep your personal information secure and confidential.
 - 10.1.4.1. Other members of the GTC Group, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (for example, its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy

- 10.1.4.2. Our employees as required by their employment conditions
- 10.1.4.3. Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements
- 10.1.4.4. Payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like 3rd party EFT service providers
- 10.1.4.5. Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime
- 10.1.4.6. Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with
- 10.1.4.7. Our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you
- 10.1.4.8. Persons to whom we have ceded our rights or delegated our obligations to under agreements, like where a business is sold
- 10.1.4.9. Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- 10.1.4.10. Trustees, Executors or Curators appointed by a court of law
- 10.1.4.11. Our joint venture and other partners with whom we have concluded business agreements, for your benefit

Under what circumstances will we transfer your information to other countries?

- 11.1. We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:
 - 11.1.1. Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient
 - 11.1.2. Where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest
 - 11.1.3. Where you have consented to the transfer; and / or

11.1.4. Where it is not reasonably practical to obtain your consent, the transfer is in your interest. This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied. An example of us transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country, or request that we facilitate salary payments to your employees in the countries.

Your duties and rights about the personal information we have about you.

- 12.1. You must provide proof of identity when enforcing the rights below.
- 12.2. You must inform us when your personal information changes. Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how you can give effect to the rights listed below.
- 12.3. You have the right to request access to the personal information we have about you by contacting us. This includes requesting:
 - 12.3.1. Confirmation that we hold your personal information
 - 12.3.2. A copy or description of the record containing your personal information; and
 - 12.3.3. The identity or categories of third parties who have had access to your personal information
- 12.4. We will attend to requests for access to personal information within a reasonable time.
- 12.5. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties.
- 12.6. We will inform you of the fee before attending to your request.
- 12.7. Please note that the law may limit your right to access information.
- 12.8. You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it.

- 12.9. You must inform us of your request in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.
- 12.10. It may take up to 15 business days for the change to reflect on our systems.
- 12.11. We may request documents from you to verify the change in personal information.
- 12.12. A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement.
- 12.13. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your relationship with us. You may object on reasonable grounds to the processing of your personal information.
- 12.14. We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.
- 12.15. You must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.
- 12.16. You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

How we secure your personal information.

- 13.1. We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological and procedural safeguards) will be appropriate and reasonable. This includes the following:
 - 13.1.1. Keeping our systems secure (like monitoring access and usage)
 - 13.1.2. Storing our records securely

- 13.1.3. Controlling the access to our buildings, systems and/or records; and
- 13.1.4. Safely destroying or deleting records
- 13.1.5. Ensure compliance with international security standards

How long do we keep your personal information?

- 14.1. We will keep your personal information for as long as:
 - 14.1.1. The law requires us to keep it
 - 14.1.2. A contract between you and us requires us to keep it
 - 14.1.3. You have consented to us keeping it
 - 14.1.4. We are required to keep it to achieve the purposes listed in this Privacy Policy
 - 14.1.5. We require it for statistical or research purposes
 - 14.1.6. A code of conduct requires us to keep it; and / or
 - 14.1.7. We require it for our lawful business purposes Note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

Children's Privacy

- 15.1. We will obtain the required consent from parents or guardians of children before processing the personal information of children. Consent from parents or guardians of children will also be obtained where the child's personal information is sent to a foreign country. The Protection of Personal Information Act's requirements for transborder flow of information will be strictly observed.

Date of change	Responsible	Summary of change
June 2021	GTC Compliance	Version 1