

PRIVACY POLICY

1. INTRODUCTION

- 1.1. In this Policy, any reference to “we” or “us” or “our” refers to Debtin Consultants (Pty) Ltd (“Debt-IN”), a business registered in South Africa and its affiliates.
- 1.2. Any reference to “you”, “your” or “user” refers to the data subject.
- 1.3. This Policy outlines how we process the personal information you provide to us or that we collect through other means when we provide our services or when you access our website and social media platforms.
- 1.4. This Policy must be read together with our website terms and conditions of use and any other contractual agreement you may have with us.
- 1.5. A notice will be posted on our website home page whenever the Policy amended.
- 1.6. Please check the website regularly to ensure that you are aware of the latest version of this Policy.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 2.1. The service we provide to you determines the exact nature of the personal information we process, and the purpose that your personal information is collected and used for. As a business process outsourcing provider, the personal information we process includes the following:
 - Information about you – your name, identity number
 - Contact information – your email, address, phone number and physical address
 - Online information – cookies and IP address (your computer’s internet address), if you use our websites and/or social media channels.
 - Financial information – we may process information related to your business
 - Contractual information - details about contracts with third parties.
- 2.2. We may need consent to process your personal information. Once we have your consent for a specific purpose, you can withdraw it at any time.
- 2.3. Withdrawing your consent will not affect the processing that occurred before your withdrawal, and it will not affect the processing of your personal information where consent is not required.
- 2.4. You may object to our processing of your personal information on reasonable grounds, unless legislation provides for such processing.
- 2.5. If you refuse to provide us with your personal information, we may not be able to provide you with a service or would have to terminate our business relationship.
- 2.6. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.
- 2.7. No information relating to children is collected to our knowledge.

3. WHY IS YOUR PERSONAL INFORMATION COLLECTED AND HOW IS IT USED?

- 3.1. We use your personal information to provide business process outsourcing services to you, which may include the following:
 - To provide you with our services, and maintain our relationship with you;
 - To meet our contractual obligations with you;
 - To detect or prevent unlawful activity, fraud, money-laundering and loss;
 - For risk analysis or risk management;
 - To record, monitor and/or access your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - For statistical analysis and research purposes;

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- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience with us and to help us improve our service to you;
- To market our services, provided that you have not objected to receiving such marketing;
- For safety and security purposes;
- For debt recovery or debt tracing purposes;
- To execute a transaction in accordance with your request;
- To comply with our regulatory reporting obligations;
- To comply with our legal obligations, including screening of clients and visitors' health when accessing our premises to comply with COVID-19 regulations and protocols;
- To conduct recruitment and hiring processes, which includes but is not limited to conducting criminal record and credit checks (where appropriate), the capturing of applicants details and providing status updates to job applicants;
- To create supplier profiles on our systems, to pay suppliers, for general supplier administration and supplier database maintenance;
- To respond to your query when you contact our call centre;
- To create client profiles on our systems, to invoice clients, for general client administration and client database maintenance;
- To carry out any other reasonable business operation considering our business and the relationship between the parties; and
- For any purpose related to and compatible with the above.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

- 4.1. We are committed to respecting your privacy and to processing your personal information lawfully, transparently and securely in accordance with the Protection of Personal Information Act No. 4 of 2013 ("POPIA").
- 4.2. We may collect your personal information in the following ways:
 - Directly from you when you provide information electronically, telephonically or in hard copy.
 - Indirectly from you when you interact with our website, social media or email addresses, which may include the collection of metadata (data about data).
 - From employers who are authorised to provide us with your personal information.
- 4.3. We will also collect the personal information of any other person whose details you provide to us in accordance with POPIA.

5. IS YOUR PERSONAL INFORMATION COLLECTED BY THIRD PARTIES?

- 5.1. Third-party information system administrators that have access to our client database, may collect personal information about you to provide us with information system or other software services.
- 5.2. We use social networking services such as LinkedIn to communicate with the public and our clients. If you choose to communicate with us through these services, that social networking service may collect your personal information for its own purposes. These services have their own privacy policies which are independent of ours and it is your responsibility to acquaint yourself with those processes or policies.
- 5.3. Your personal information will never be provided to third parties without your consent. We do not control the collection or use of your personal information by third parties and this Policy does not apply to third parties. We do not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.

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6. IS YOUR PERSONAL INFORMATION SHARED BY US?

- 6.1. Your personal information will only be shared with third parties or representatives if there is a legitimate reason to do so.
- 6.2. Your personal information may also be shared with third-party consultants to fulfil our contractual obligations to you.
- 6.3. We will not sell, rent, or trade your personal information to any third party.
- 6.4. We will disclose information when legally required to do so to comply with any relevant legislative and regulatory requirements.

7. IS YOUR PERSONAL INFORMATION TRANSFERRED INTERNATIONALLY?

- 7.1. We may need to send your personal information to another country for storage or processing on our behalf by an international service provider.
- 7.2. We will only send your personal information to service providers in a country that does not have information protection laws similar to that of the Republic of South Africa if the recipient agrees to adhere to the principles of POPIA.

8. CCTV MONITORING

- 8.1. Our facilities and premises are monitored by CCTV cameras for crime prevention, quality control and general public safety.

9. IS YOUR PERSONAL INFORMATION STORED SECURELY?

- 9.1. We strive to protect your privacy and the confidentiality of your personal information.
- 9.2. Appropriate information security measures have been implemented to keep your information secure, accurate and updated.
- 9.3. We cannot guarantee the security of any information you transmit to us online and you do so at your own risk.
- 9.4. Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.
- 9.5. We assure you that reasonable steps are taken to ensure the reliability and integrity of our employees who have access to your personal information for a specific purpose.

10. YOUR RIGHT TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

- 10.1. You have the right to access your personal information held by a public or private body in terms of the Promotion of Access to Information Act ("PAIA").
- 10.2. Your right to access your personal information can be exercised by referring to our PAIA Manual ([here](#)).
- 10.3. You have the right to correct any of your personal information held by us.
- 10.4. Your right to correct your personal information can be exercised using the procedure outlined in our PAIA Manual ([here](#)).
- 10.5. You are entitled to exercise the rights conferred to you under the General Data Protection Regulation (GDPR) by sending a request to our Compliance Officer at compliance@capabilitybpo.com.

11. USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

- 11.1. If your personal information has been provided to us, you consent to us sending you information on news, trends, services, events and promotions for our own similar services.
- 11.2. You will always have the right to opt out of receiving such marketing when your information is collected and whenever we send you a marketing communication. You may opt out at any time by e-mailing us on compliance@capabilitybpo.com.

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11.3. Where you choose to exercise your right to opt out of direct marketing, please allow up to 21 days for us to effect that change.

12. CLICKSTREAM DATA

12.1. Anonymous information from visitors to our website may be collected.

12.2. We ensure that the information collected cannot be used to identify you. This information is sometimes known as "clickstream data" or "traffic data".

12.3. The information which may be collected includes:

- Your IP address;
- The search terms you have used;
- The pages accessed on the website and the links you've clicked on;
- The date and time you visited the website;
- The referring website (if any) through which you clicked through to our website; and
- The type of website browser you use.

12.4. The traffic data is aggregated and not personally identifiable.

12.5. Our website analysis will also respect any 'do not track' setting you might have on your web browser.

13. OUR COOKIE POLICY

13.1. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are essential to the functioning and design of our website.

13.2. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

13.3. We use cookies to measure how many times a page has been visited or whether a page has been visited on the website through an advertisement.

13.4. Cookies help us to remember your selected settings on our website so that we remember your preferences on your return visit.

13.5. On certain pages of the website, we use cookies to help us understand your interests as you browse the internet, so we can tailor and render to you more personalised content and services in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third-party sites.

13.6. In addition, we also use cookies on certain pages of our website to communicate with third-party data suppliers to analyse your digital behaviour. This helps us to understand and target more relevant advertising in the future.

13.7. The information we receive is all anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle.

13.8. If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you can decide whether to accept it or not.

13.9. Please note that if you do turn off "cookies" in your browser, you will not be able to fully experience some of the features of the website.

14. QUERIES/COMPLAINTS

14.1. Questions, comments, concerns and requests regarding this statement may be directed to **compliance@capabilitybpo.com**.

14.2. If you have a complaint or concern regarding the processing of your personal information, please submit your complaint to **compliance@capabilitybpo.com**.

14.3. The contact details for our appointed Information Officer/Data Protection Officer can be found hereunder:

Name: Nirshan Harryparshad
Contact Number: 087 351 5109

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Email: compliance@capabilitybpo.com

15. DATA BREACH RESPONSE

- 15.1. We have appointed an incident response team within our Compliance Department to manage any data breach.
- 15.2. If your personal information is compromised as a result of a cyber-attack or some form of data incident, we will notify you of this as soon as is reasonably possible.

16. CONTACTING THE INFORMATION REGULATOR

- 16.1. Please allow us the opportunity to address any complaints regarding our processing of your personal information however you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa):

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaints: POPIACompliants@infoeregulator.org.za

General enquiries: enquiries@inforregulator.org.za