

## PRIVACY POLICY

### INTRODUCTION

1. Okcash (Pty) Limited ([2023/003008/07] / NCRCP[17299]) ("**Okcash**") takes your privacy seriously. This privacy policy explains why we collect data, what data we collect, how we store and transfer that data as well as who we may share the data with. By downloading the App, you confirm that you have read, understood and accept the terms of this privacy policy set out hereunder. You also consent to the collection, use, storage, processing and disclosure of your personal information in the manner set out in this privacy policy.
2. If you have any questions about this privacy policy or other privacy issues, we can be reached at: okcash3008@gmail.com

### PURPOSE AND CONSENT

3. You specifically authorize us to collect and process data in accordance with this privacy policy. Collection of data by us shall be conducted in accordance with the Protection of Personal Information Act 4 of 2013 ("**the Act**") as may be applicable and/or amended from time to time.
4. It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are fully aware of how and why we are using your personal information. This Privacy Policy supplements the other notices and is not intended to override them.
5. We do not process the data of minors nor special categories of personal information. Do not provide us with any such personal data, as it will constitute an immediate and automatic breach of this Privacy Policy and our Terms.

### RESPONSIBLE PARTY

6. We are the "Responsible Party" and are responsible for your personal information when we its decide processing operations. In certain instances we may operate as an "Operator" of personal information on behalf of a third party.
7. We have appointed an information officer who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our information officer using the details set out below.

Company Name: Okcash (Pty) Limited

Information Officer: Shimane Khoza

Email address: okcash3008@gmail.com

Postal Address: 377 Rivonia Boulevard, cnr Rivonia Blvd & 12th Ave Rivonia, JHB 2128, stand number 155.

Telephone: 0735771023

You have the right to make a complaint at any time to the South African regulator's office (Information Regulator's Office of South Africa). We would, however, appreciate the chance to deal with your concerns before you approach any such regulator, so please contact us in the first instance.

### CHANGES

8. This Privacy Policy was last updated on [December 1 st 2023] and previous versions are archived and can be provided on request.
9. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

10. This Privacy Policy is subject to change without notice and is updated or amended from time to time and will be effective once we upload the amended version to the Platform. Your continued access or use of our Services constitutes your acceptance of this Privacy Policy, as amended. It is your responsibility to read this document periodically to ensure you are aware of any changes.

#### **LINKS**

11. The Platform may include links to third-party platforms, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party platforms and are not responsible for their privacy statements or terms. When you leave our Platform, or engage with such third parties, we encourage you to read the distinct privacy policy of every third-party you engage with.

#### **WHY WE COLLECT DATA.**

12. Our product is designed to provide personalized loan options for people in need. With the explicit permission of our customers, we will analyze your smartphone data to verify your identity and create credit scoring models to determine what Loans can be offered to you. We also use this data for purposes of collections and credit reporting. We will only collect and process your personal information for the reason you provided it to us, or to enable us to comply with the requirements of specific laws that we are governed by.

#### **THE DATA WE COLLECT.**

13. When you register for the Service, we will collect your:
- i. National Identity Card Number
  - ii. Date of Birth-
  - iii. Email address
  - iv. Registered mobile Number
  - v. Monthly income, pay day and monthly expenses
  - vi. Other outstanding loans
  - vii. Details of emergency contacts: Full legal names and Telephone Numbers
  - viii. Your monthly income and pay date
  - ix. Employment detail: Whether permanent or contract or unemployed
  - x. Residential status: Whether rented or owned
14. The information listed above shall be used to conduct due diligence and determine that you are the authorized user as well as assess your credit worthiness. We may also use some of the information above to create a unique user reference to identify you, guarantee your account security and to ensure that your information is encrypted.
15. We may also collect other information from your phone as below for which we seek permission from yourself to process the information: -
- i. SMS: We also collect and monitor SMS to enable disbursement of the funds to you. You receive an acknowledgement message for receipt of the fund. This information also assists to reduce risks associated with your application and provide customized offers. We also collect and monitor SMS to enable disbursement of the funds to you.
  - ii. Storage: We collect and require access to your storage to enable you upload documents/pictures for due diligence purposes during registration.
  - iii. Phone: We seek permissions to access your phone details as we collect and monitor specific information about your device including your hardware model, operating system

and version, unique device identifier, installed software applications, user profile information, wi-fi information, mobile network information as a safety measure to uniquely identify the devices and ensure that unauthorised devices are not able to act on your behalf helping us to prevent fraud. This information may also be used for our credit scoring system.

- iv. Location: You acknowledge and agree that we require access to your GPS location when using our Services. We collect and monitor information about the location of your device to ensure that you are within the South Africa geographical location, for loan applicability. We also use the information to provide serviceability of your loan application, to reduce risks associated with your application and also provide you with customized offers for all products available. We furthermore require your GPS location as part of our anti-money laundering and anti-terrorism practices. Failure to authorise use of your GPS location will disqualify you from using our Services. We may collect this information either continuously or while you are using the Application, to provide location-based services. Geolocation services are provided by Google LLC. By using the service, you accept Google's Terms of Service available at <https://policies.google.com/terms>.
- v. Contacts: We collect and read your phone contact list to detect emergency references and allow you to auto-fill data during loan application process. We upload your emergency contact's name and phone number for due diligence purposes and may cross-check your identity with them.
- vi. Software Applications: We may collect information through the software applications on your phone.
- vii. Phone Number: Your phone number is collected for registration and sign-in purpose.

#### **HOW WE COLLECT YOUR DATA**

- 16. In most cases, personal information will be collected directly from you or through your device, but there may be other instances when we will collect personal information from other sources. These may include, but are not limited to, public records, places where you may already have made your personal information public (for example, on social media) or credit bureaus. We will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask us which sources we used to collect your personal information. By registering for the Service, you authorize the collection and processing of the foregoing data.
- 17. We may use tracking pixels, and other tracking technologies on the application to update our credit scoring system, help customize the application, and improve your experience. When you access the Application, your personal information may be collected through the use of tracking technology.
- 18. There may be instances where we will process your personal information through a secure automated tool, or perform profiling resulting in a decision that may affect you. You hereby acknowledge that such automated collection methods are necessary to ensure the services are rendered to you in a timely manner and as such hereby irrevocably agree to such automated tool being utilized.

#### **DATA SECURITY**

- 19. In the provision of our services, we employ strict security measures to guarantee data integrity and confidentiality. We protect personal data against unauthorized disclosure or access, accidental or unlawful destruction or accidental loss, alteration, and all forms of unlawful intrusion. Such measures include encryption, intrusion detection and prevention systems, database security check, firewalls amongst other mechanisms.

#### **HOW WE TRANSFER AND STORE DATA**

- 20. Because we are a part of an international group of companies with data-centers around the world, We may process and store your data locally in the South Arica or in a foreign country. We will, however, ensure that we implement security measures and your data is protected to a strict standard. You hereby consent to the foreign processing or storage of your personal data on our own, through affiliates or third

party service providers such as the Cloud Service and international transfers. Where we use foreign data centers or use foreign third party service providers we shall ensure and mandate that our partners ensure a level of protection of such data comparable to that provided for under South African Law as well as best practice standards. By your use of our service and products you irrevocably agree that we may process or transfer your data, to other countries as may be necessary in order for us to make the services and products available to you.

### **WHO WE SHARE DATA WITH**

21. We may share your data with third parties in certain circumstances. We may, for example, share data with: (i) credit bureaus, in requesting credit histories or reporting loan defaults; (ii) collections agencies, in seeking to collect overdue Loans; (iii) government bodies and law enforcement agencies, to comply with the law; (iv) professional advisers, to enforce or defend our legal rights; (v) or with a purchaser or seller in connection with a corporate event such as a merger, business acquisition or insolvency situation.

### **DATA RETENTION**

22. We will only retain your personal information for as long as necessary to fulfil the purpose we collected it for including any legal, accounting, or reporting requirements.
23. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purpose for which we process your personal information, any other South African applicable law requiring us to retain the personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
24. We may also anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **YOUR LEGAL RIGHTS**

25. You have the following rights regarding your personal information:
  - i. request access to your personal information;
  - ii. request correction of your personal information;
  - iii. request erasure of your personal information;
  - iv. object to the processing of your personal information;
  - v. request a restriction of processing your personal information;
  - vi. request transfer of your personal information; and/or
  - vii. right to withdraw consent.
26. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
27. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
28. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.