

LERUMO GROUP PRIVACY STATEMENT

The purpose of this document (“**Privacy Statement**”) is to inform the reader of how Lerumo Holdings (Pty) Ltd and all of its subsidiaries (“**Lerumo**”) manages and processes (any operation or set of operations performed on data by any means such as collecting, recording, organization, storage, adaptation or alteration of personal information etc.) personal information. The manner in which Lerumo manages Personal Information (personal data, as defined in the data protection laws, includes, but is not limited to, names, postal address, email address, telephone number, date of birth etc.), is subject to the Electronic Communications and Transactions Act 25 of 2002; Protection of Personal Information Act 4 of 2013 Regulations (“**Data Protection Laws**”).

When users (individuals who make use of any Lerumo websites and/or applications) interact with Lerumo, submit information to Lerumo, or sign up for any products and/or services offered by Lerumo, all personal information, which may be collected through our website or other channels, is treated as confidential and private. Lerumo manages the user’s personal information in the following ways:

- By collecting personal information;
- Using such personal information;
- Sharing (amongst ourselves) the users personal information; and
- Disclosing such personal information to Lerumo’s authorised service providers as well as relevant third parties in the manner set forth in this Privacy Statement.

Lerumo may from time to time update this document to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements.

1. COLLECTION OF PERSONAL INFORMATION

1.1 Generally, Lerumo collects user Personal Information in the following ways:

- 1.1.1 Upon submission of an application form or other forms relating to any of Lerumo’s products and services;
 - 1.1.2 When interacting with Lerumo’s customer service officers (via telephone calls, letters, face-to-face meetings and emails);
 - 1.1.3 When making use of any Lerumo service i.e. Websites and/or applications;
 - 1.1.4 Upon submission of a request for Lerumo to contact them, or request to be included in an email or other mailing lists;
 - 1.1.5 When there is a response to Lerumo promotions, initiatives or to any request for additional Personal Data;
 - 1.1.6 When contacted by or respond to Lerumo marketing representatives and customer service officers;
 - 1.1.7 When Lerumo receives references from business partners and third parties;
 - 1.1.8 When Lerumo seeks information from third parties in connection with the products and services applied for; and
 - 1.1.9 Upon submitting Personal Information to Lerumo for any other reason.
- 1.2 When a user browses Lerumo Websites, it is generally done anonymously. Lerumo does not automatically collect Personal Information unless such information is provided or login credentials are used.
- 1.3 If Lerumo is provided with any Personal Information relating to a third party (e.g. information about a spouse, children, parents and/or employees), by submitting such

information, a user confirms that the consent of the third party to provide Lerumo with such personal information has been obtained. .

- 1.4 Users must ensure that all Personal information submitted to Lerumo is complete, accurate, true and correct. Failure to do so may result in Lerumo's inability to provide users with the products and services requested.

2. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

- 2.1 Generally, Lerumo collects, uses and discloses Personal Information of users for the following purposes:
 - 2.1.1 To respond to queries and requests;
 - 2.1.2 To manage the administrative and business operations of Lerumo and comply with internal policies and procedures;
 - 2.1.3 To facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
 - 2.1.4 To match any Personal Information held, relating to any of the purposes listed herein;
 - 2.1.5 To resolve complaints and handle requests and/or enquiries;
 - 2.1.6 To prevent, detect, investigate a crime, analyse and manage commercial risks;
 - 2.1.7 To provide media announcements and responses;
 - 2.1.8 To monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - 2.1.9 For legal purposes (including but not limited to obtaining legal advice and dispute resolution);
 - 2.1.10 To conduct investigations relating to disputes, billing, suspected illegal activities or fraud;
 - 2.1.11 To meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Lerumo (including but not limited to responding to regulatory complaints, reporting to regulatory bodies and conducting audit checks, due diligence and investigations); and
 - 2.1.12 For purposes which are reasonably related to the aforementioned.
- 2.2 In addition to the above, Lerumo collects, uses and discloses Personal Information of users for the following purposes:
 - 2.2.1 As a customer or an employee of an organisation which is a customer of Lerumo:
 - 2.2.1.1 Opening or continuation of accounts and establishing or providing users with the products and services subscribed to;
 - 2.2.1.2 Facilitating the continuation or termination of user subscription to Lerumo products and services;

- 2.2.1.3 Facilitating the daily operation of the products and services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting);
- 2.2.1.4 Facilitating third party services if purchased, obtained, administered or processed through Lerumo;
- 2.2.1.5 Managing and executing Lerumo service level agreements with users;
- 2.2.1.6 Processing of payment instructions, direct debit facilities and/or credit facilities requested by users;
- 2.2.1.7 Enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners);
- 2.2.1.8 Administering and processing any insurance claims and payments arising under the respective policies;
- 2.2.1.9 Credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies);
- 2.2.1.10 Generation of internal reports (including but not limited to annual, operational and management reports);
- 2.2.1.11 Processing referral payments and commission fees to Lerumo's external partners;
- 2.2.1.12 Administering fee adjustments, refunds and waivers;
- 2.2.1.13 Analysing user experience with Lerumo products and services so as to help us improve, review, develop and efficiently manage the products and services offered; and
- 2.2.1.15 For purposes which are reasonably related to the aforementioned.

2.3 Furthermore, where permitted under the Data Protection Laws:

- 2.3.1 Lerumo may also collect, use and disclose Personal Information of users for the following additional purposes:
 - 2.3.1.1 For analytics and tracking, including facilitating the sale of analytical data;
 - 2.3.1.2 To conduct market research and surveys to enable Lerumo to understand and determine customer location, preferences and demographics in order to develop special offers and marketing programmes in relation to Lerumo products and services, and to improve our service delivery and customer experience;
 - 2.3.1.3 To provide additional products, services and benefits to users, which include promotions, loyalty and reward programmes from Lerumo;
 - 2.3.1.4 To match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by Lerumo;
 - 2.3.1.5 For leads generation and management of marketing Lerumo's products and services;

- 2.3.1.8 To communicate advertisements involving details of Lerumo's products and services, special offers and rewards, either to general customers, or to communicate advertisements which Lerumo has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling and telemarketing);
 - 2.3.1.9 To organise promotional events and corporate social responsibility projects; and
 - 2.3.1.10 For purposes which are reasonably related to the aforementioned.
- 2.4 In relation to particular products and services or user interactions, Lerumo may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- 2.5 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication. Users may contact Lerumo using the Head Office contact details found on the main website www.lerumo.co.za.
- 2.6 Once Lerumo receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be reflected on the system. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. It may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, Lerumo may still contact users for other purposes in relation to the products and services held by users or subscriptions to Lerumo.

3. PROCESSING OF PERSONAL INFORMATION

- 3.1 By providing Personal Information to Lerumo, users acknowledge that the information has been collected from them directly and there is consent for Lerumo to process such information.
- 3.2 Where users submit Personal Information (such as name, address, telephone number and email address) via the Lerumo Website (e.g. through completing any online form) the following principles are observed in the processing of such information:
- 3.2.1 Lerumo will only collect Personal Information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
 - 3.2.2 Lerumo will only process Personal Information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.
 - 3.2.3 Personal Information will only be processed for a purpose compatible with that for which it was collected, unless the user has agreed to an alternative purpose in writing or Lerumo is permitted in terms of national legislation of general application dealing primarily with the protection of Personal Information. .
 - 3.2.4 Lerumo will keep a record of all Personal Information collected and the specific purpose for which it was collected for a period of 1 (one) year from the date on which it was last used.

- 3.2.5 Lerumo will not disclose user Personal Information relating to any third party, unless prior written consent from the user is obtained, or where Lerumo is required to do so by law.
- 3.2.6 If Personal Information is released with consent of the user, Lerumo will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.
- 3.2.7 Lerumo will destroy or delete any Personal Information that is no longer needed by Lerumo for the purpose it was initially collected, or subsequently processed.

4. DISCLOSURE OF PERSONAL INFORMATION

- 4.1 Lerumo will take reasonable steps to protect Personal Information of users against unauthorised disclosures. Subject to the provisions of any applicable law, Personal Information may be disclosed for the purposes listed above (where applicable), to the following:
 - 4.1.1 Lerumo's related corporations and employees to provide content, products and services to address user questions and requests in relation to customer accounts, subscription and billing arrangements with Lerumo as well as products and services;
 - 4.1.2 Companies providing services relating to insurance and consultancy to Lerumo;
 - 4.1.3 Agents, contractors or third party service providers who provide operational services to Lerumo, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to Lerumo;
 - 4.1.4 Vendors or third party service providers in connection with marketing promotions and services offered by Lerumo;
 - 4.1.5 Other telecommunications, content or other service providers to facilitate their provision of content or services, or for interconnection, inter-operability, system operation and maintenance and billing between service providers;
 - 4.1.6 Collection and repossession agencies in relation to the enforcement of repayment obligations for debts;
 - 4.1.7 Credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness;
 - 4.1.8 External banks, credit card companies and their respective service providers;
 - 4.1.9 Lerumo's professional advisers such as auditors and lawyers;
 - 4.1.10 Relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
 - 4.1.11 Any other party to whom users authorise Lerumo to disclose Personal Information to.

5. TRACKING TECHNOLOGIES AND COOKIES

- 5.1. We use Cookies and similar tracking technologies to track the activity on our website and store certain information. Tracking technologies used are beacons, tags, and scripts to

collect and track information and to improve and analyse our website. The technologies we use may include:

- 5.1.1. Cookies or Browser Cookies. A cookie is a small file placed on your device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our website. Unless you have adjusted your browser setting so that it will refuse Cookies, our website may use Cookies.
 - 5.1.2. Web Beacons. Certain sections of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).
- 5.2. Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser. We use both Session and Persistent Cookies for the purposes set out below:
- 5.2.1. Necessary / Essential Cookies – Session Cookies administered by us.

Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.
 - 5.2.2. Functionality Cookies – Persistent Cookies administered by us.

Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

6. Your Rights

- 6.1. You have the right to object to the processing of your personal information.
- 6.2. You have the right to access your Personal Information which we collect from you, including to correct factual errors, review and/or update information.
- 6.3. Such request can be made by sending an email to us at rogerb@lerumo365.co.za.
- 6.4. Any access request may be subject to a fee to meet our costs in providing you with details of the information We hold about you.
- 6.5. Should you believe that Lerumo has processed your personal information contrary to legislation in South Africa as read with this privacy policy, you undertake to first attempt to resolve any concerns by addressing a complaint in writing to the Information Officer. If you are not satisfied with the outcome of such process, you have the right to lodge a complaint with the Information Regulator.

- 6.6. Information Officer: Roger Blane
Email: rogerb@lerumo365.co.za
ILC Lerumo (Pty) Ltd, 11 Centuria Park, 265 Von Willigh Avenue, Centurion, 0157
The Information Regulator (South Africa)
Email: info@justice.gov.za
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

7. QUERIES

- 7.1 If a user :
- 7.1.1 Would like to withdraw consent to any use of their Personal Information as set out in this Privacy Statement, they may contact the business unit executive that manages their account.
 - 7.1.2 Would like to obtain access and make corrections to their Personal Information records, they may contact the business unit executive that manages their account.
- 7.2 If your Personal Information has been provided to Lerumo by a third party (e.g. a referrer), users should contact that organisation or individual to make such queries, complaints, and access correction requests to Lerumo on their behalf.
- 7.3 If a user withdraws their consent to any or all use of Personal Information, depending on the nature of such a request, Lerumo may not be in a position to continue to provide its products and services to users. In addition, Lerumo may not administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Lerumo, and may result in the user being in breach of contractual obligations or undertakings. Lerumo's legal rights and remedies in such event are expressly reserved.

8. GOVERNING LAW

- 8.1 This Privacy Statement and use of the Website shall be governed in all respects by the laws of South Africa.

9. CONTACT US

- 9.1. If you have any questions about this Privacy Notice, you can contact us:
By visiting our website: <https://www.lerumo.co.za>
By phone number: +27 12 663 4806
By mail: info@lerumo.co.za