

## PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPIA”)

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer’s Contact Details	
Name	A.Duvenage
Contact Number	087 654 5929
Email Address:	support@ibureau.services

### Our details:

#### Hirodox (Pty) ltd t/a IBureau Services

**Physical Address:** 1st Floor, Building D, Glenfield Office Park, 375 Oberon Ave., Faerie Glen, Pretoria, 0081

**Contact number:** 087 654 5929

**Organisation E-mail address:** [support@ibureau.services](mailto:support@ibureau.services)

The Organisation is a registered Credit Bureau with the National Credit Regulator with NCR registration number NCRCB43.

### We render credit bureau services in the following product categories:

- Consumer Credit reports;
- Home Affairs Identification services;
- Account verification services;
- Reckless lending investigations;

### The source of collection of your personal information via our independent network of registered NCR Debt Counsellors (refer to as the “Subscribers”):

We collect personal information directly from the following data subjects and in this case prospective clients via our independent network of Registered Debt Counsellors who offer financial wellness, debt counselling, insurance (credit life, short term, long term) and related services to the data subjects and must only obtain this information from the data subjects once consent is provided by the prospective clients.

### Personal information is collected directly from you via our independent network of Subscribers through the following means:

- By means of explicit consent provided by you once the Subscriber engage with you on a telecon;
- By means of consent provided verbally to the Subscriber during the initial telecon;
- By means of signing the debt counselling application forms, insurance mandates and letter of appointments, power of attorneys and other relevant documents required by the Subscriber to fulfil their duties. These forms are completed either electronically or in hard copy. You may also be requested to provide your personal information during your consultation with a representative;

We may also collect information about you from other sources such as external third parties and from cookies on our website.

### Data retention period:

Data obtained from prospective clients and data subjects is retained for a maximum period of 72 hours.

## **Law authorising or requiring collecting of the personal information:**

As a registered NCR Credit Bureau, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- National Credit Act 34 of 2005;
- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Insurance Act 18 of 2017;
- Short-Term Insurance Act 53 of 1998;
- Long-Term Insurance Act 52 of 1998;

## **Purpose for Processing your Information:**

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and the Debt Counsellor. These services include debt counselling, credit repair services, reckless lending investigations, account verifications. Identity verifications, credit life and other insurance related offerings etc;
- On selling of consumer credit reports, home affairs information, account verification information and reckless lending reports;
- Providing you with advice products and services that suit your needs as requested;
- To verify your identity and to conduct credit reference searches;
- To issue, administer and manage your insurance policies;
- To process insurance claims and to take recovery action;
- To notify you of new products or developments that may be of interest to you;
- To confirm, verify and update your details;
- To comply with any legal and regulatory requirements;

Some of your information that we hold may include, your first and last name, id number, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, past employment, residency status, all information pertaining to your credit obligations and credit score, existing insurance policies, information on whether you previously applied for debt counselling together with the status listed with the NCR, marital status, assets, liabilities and your banking details.

Some of the above information may be mandatory to provide within the context of the services requested by yourself.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider.

## **Third parties and your personal information**

We may need to share your information to third parties provide advice, reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- Your employer (where applicable);
- The Compliance Officer of the organisation (where applicable);
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology and telecommunication service providers / specialists performing data storage, security, application processing, stakeholder communication, analytics, etc;
- Auditors of the Organisation;
- Employees of the Organisation;

- Regulatory or governmental authorities such as the National Credit Regulator, National Consumer Tribunal, Courts, Financial Sector Conduct Authority and the Prudential Authority;
- Your Creditors listed per your consumer credit report;
- The Organisation may share your information as part of its statutory and reporting obligations with:
  - Infusion Financial Services utilizing the Plan Pro system (Credit Life Insurance offering);
  - The Debt Counselling CRM platform (I-DOCS)
  - The independent Debt Counsellors appointed operating system and Payment Distribution Agent

The Debt Counselling Operating systems (Finwise, Simplicity, Intuitive, Maximus)

Debt Counselling legal software (Legasys)

### **The Transfer of your personal information outside of the Republic of South Africa**

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. The third-party service providers are located in:

- Ireland and other AWS regions

We confirm that the level of protection afforded to your personal information by that third country or international organisation is equal to the protection afforded by the POPI Act.

### **Complaints and objections**

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed (Annexure A);
- Request that we consider your objections to the processing of your personal information;
- Lodge a complaint with the Information Regulator;
- Lodge a complaint with the Information Regulator;
- In the event that your personal information has not been processed in accordance with the POPI Act please email the Information office on details provided above;

### **The Information Regulator**

If your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information officer, details provided above, or alternatively the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

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

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

Website: <https://www.justice.gov.za/inforeg/index.html>

