PRIVACY POLICY

1. Definitions

1.1 “POPIA” means the Protection of Personal Information Act 4 of 2013;

1.2 "personal information" as defined in terms of The Protection of Personal Information Act, Act 4 of 2013 means information relating to an identifiable, living, natural person and, where it is applicable, information relating to an identifiable, juristic person, including –

➢ information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, sexual orientation, age, physical or mental health, wellbeing, disability, religion, belief, culture, language and place of birth of the person;

➢ information relating to the education or the medical, financial, criminal or employment history of the person;

➢ an identifying number, symbol, e-mail address, telephone number, location, online identifier or other particular assignment to the person;

➢ the biometric information of the person;

➢ the personal opinions, views or preferences of the person or the views or opinions of another individual about the person;

➢ correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal contents of the original correspondence; and

➢ the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

1.3 “data controller/operator” means any person or entity that processes personal information on behalf of the responsible party;

1.4 “process”, “processing” or “processed” means anything that is done with any personal information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

1.5 “responsible party” means the person or entity that decides how and why personal information is processed;

1.6 “service provider” means third parties who provide various services to Russell Becker Collections(Pty) Ltd;

1.7 “data subject”**:** refers to the person, legal entity, public body or company to whom the personal information relates and / or is being processed;

1.8 “Website” means www.rbcollections.co.za

2.Introduction and Scope:

2.1 Protection of personal information is a priority at Russell Becker Collections (Pty) Ltd;

2.2 We are committed to the safeguarding and protecting personal information and to ensuring that our use of your personal information is lawful, reasonable, and relevant to our business activities;

2.3 Any questions relating to this policy or rights as defined under data protection legislation may be directed to our Information Officer and / or Deputy Information via email at infor@rbcollections.co.za;

2.4 This privacy policy explains how Russell Becker Collections (Pty) Ltd collects and uses personal information;

2.5 It contains information regarding the rights of natural and juristic persons to whom personal information relates (data subjects);

2.6 Russell Becker Collections (Pty) Ltd reserves the right to review and amend this Privacy Policy or add provisions to it at any time. The latest version of this Policy will available on request;

2.7 By providing us with your personal information, you –

- agree to this Policy and authorise us to process such information as set out herein; and
- authorise Russell Becker Collections (Pty) Ltd, our Service Providers and other third parties to process your personal information for the purposes stated in this Policy;

2.8 We will not use your personal information for any other purpose than that set out in this Policy and will endeavour to protect your personal information that is in our possession from unauthorised alteration, loss, disclosure or access;

2.9 This Policy applies to all external parties with whom we interact, including but not limited to clients, representatives of client organisations, visitors to our offices, and other users of our services.

3. Collection of personal information

3.1 Personal information is obtained and collected in a lawful manner;

3.2 Personal information may be collected in the following ways:

3.2.1 From the Client;

3.2.2 From the Debtors/ Customers of the Client;

3.2.3 When an individual or entity makes its Personal Information public;

3.2.4 When interacting with our Website;

3.2.5 When you visiting our offices;

3.2.7 from public records held by public authorities;

3.2.8 from other third parties, such as Employers and

3.2.9 from databases such as CPB and from the records of the various credit bureau.

3.3 In addition, while providing debt collection services, we will create records for our collection processes and communications;

3.4 Correspondences and written documentation may contain your personal information.

4. What constitutes Personal Information:

4.1 Names and Surnames;

4.2 Identity Number /Passport Number / Date of Birth;

4.3 Nationality;

4.4 An entity's name and registration number;

4.5 Physical addresses;

4.6 Postal addresses;

4.7 Telephone number;

4.8 Email address;

4.9 Personal information included in correspondence, documents, evidence or other materials that we process in the course of providing debt collection services;

4.10 Payment details including VAT numbers; billing addresses; payment methods; bank account numbers; invoice records and payment records.

5. Purposes of processing

5.1 Personal information will be processed in the ordinary course of the business;

5.2 Personal information will primarily be used only for the purpose for which it was originally or primarily collected;

5.3 Personal information will be used for a secondary purpose only if such

purpose constitutes a legitimate interest and is closely related to the original or

primary purpose for which the personal information was collected.

6. Processing personal information

Personal Information may be processed based on the following grounds :

6.1 consent, whether express or implied;

6.2 contractual obligations; or

6.3 in terms of an applicable law.

7. Ensuring that personal information is secure

The following has been implemented by Russell Becker Collections (Pty) Ltd to ensure that all Personal Information is secure:

7.1 Technical safeguards to protect personal information against unauthorised access or disclosure;

7.2 State of the art Firewall;

7.3 Up to date anti-malware and anti-virus safe guards;

7.4 Physical and Electronic access to the property;

7.5 Web Filtering;

7.6 Email Security.

8. Disclosing Personal Information

8.1 We will not sell any personal information;

8.2 Personal information may be disclosed:

8.2.1 To service providers, for legitimate business purposes only;

8..2.2 if required by law;

8.2.3 if required and requested by any legal and regulatory authority.

9. Retention on Personal Information:

Section 14 of POPIA states that personal information must not be kept longer than necessary for achieving the purpose for which it was collected.

We only collect personal data necessary for our business function; that is, debt collection.

If there is no lawful justification or specific purpose to keep records, these records are deleted or destroyed.

10. The rights of a Data Subject (as set out in POPIA):

10.1 A data subject has the right to have his, her or its personal information processed in accordance with the conditions for the lawful processing of personal information as referred to in Chapter 3, including the right to be notified that—

- personal information about him, her or it is being collected as provided for in terms of section 18; or
- his, her or its personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22;
- to establish whether a responsible party holds personal information of that data subject and to request access to his, her or its personal information as provided for in terms of section 23;
- to request, where necessary, the correction, destruction or deletion of his, her or its personal information as provided for in terms of section 24;
- to object, on reasonable grounds relating to his, her or its particular situation to the processing of his, her or its personal information as provided for in terms of section 11(3)(a);
- to object to the processing of his, her or its personal information—
- at any time for purposes of direct marketing in terms of section 11(3)(b); or

in terms of section 69(3)(c);

- not to have his, her or its personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69(1);
- not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of his, her or its personal information intended to provide a profile of such person as provided for in terms of section 71;
- to submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74; and
- to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information as provided for in section 99.

Contact information for Russell Becker Collections (Pty) Ltd:

Contact Number:

Tel : 0828098099

Physical Address : 175B Hoosen Haffejee Street, Pietermaritzburg

Postal Address : P O Box 3433, Pietermaritzburg

Our Information Officers may be contacted as follows:

Information Officer: Chetna Nepal

Deputy Information Officer: Juanita Becker

Email: info@rbcollections.co.za

Updates:

We may amend and update this Policy from time to time which may be available upon request.