

Part 1

PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA

Purpose of the Processing of Personal Information	Type of Processing
1 To provide services to the Client in accordance with terms agreed to by the Client;	Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
2 To undertake activities related to the provision of services and transactions, including:	
2.1 to fulfil foreign and domestic legal, regulatory and compliance requirements and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to the Company	
2.2 to verify the identity of Client representatives who contact the Company or may be contacted by the Company;	
2.3 for risk assessment, information security management, statistical, trend analysis and planning purposes;	
2.4 to monitor and record calls and electronic communications with the Client for quality, training, investigation and fraud prevention purposes;	
2.5 for crime detection, prevention, investigation and prosecution;	
2.6 to enforce or defend the Company's rights; and	
2.7 to manage the Company's relationship with the Client.	
3 The purposes related to any authorised disclosure made in terms of agreement, law or regulation;	
4 Any additional purposes expressly authorised by the Client; and	
5 Any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company	

Part 2

Categories of Data Subjects and categories of Personal Information relating thereto

Categories of Data Subjects of and categories of Personal Information relating thereto	Data Subject	Personal Information Processed
<p>Client:</p> <p>o Corporate Client Profile information including, account details, payment information, corporate structure, client risk rating and other client information including to the extent the categories of information relate to individuals or representatives of clients (e.g., shareholders, directors, etc.) required for the above-mentioned purposes</p> <p>o Individual; Name; contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory identifiers (e.g. tax identification number); Account information (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; “know-your client” data, photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of client signatures)</p>	<ul style="list-style-type: none"> • Natural Persons; • Juristic Persons. 	<p>Personal data relating to a Data Subject received by or on behalf of the Company from the Client, Client affiliates and their respective representatives and related parties in the course of providing accounts and services to the Client or in connection with a transaction or services. Client personal data may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, voiceprints, bank account and transactional information (where legally permissible), to the extent that these amount to personal data under POPIA.</p>
<p>Payment beneficiaries: Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type; beneficiary address, transaction details; payment narrative and, for certain data transferred from the UK only, National Insurance numbers.</p>		
<p>Personnel:</p> <p>Name; employee ID number; business contact details (address/telephone number/email address)</p>		

Part 3

Cross border transfers of Personal Information

When making authorized disclosures or transfers of personal information in terms of section 72 of POPIA, Personal Data may be disclosed to recipients located in countries which do not offer a level of protection for those data as high as the level of protection as South Africa.

Part 4

Description of information security measures

The Company undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Company may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1 Access Control of Persons

The Company shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

2 Data Media Control

The Company undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing personal data of Clients.

3 Data Memory Control

The Company undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration or deletion of stored data.

4 User Control

The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

5 Access Control to Data

The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorization).

6 Transmission Control

The Company shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of the Company's data communication equipment / devices.

7 Transport Control

The Company shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8 Organization Control

The Company shall maintain its internal organization in a manner that meets the requirements of this Manual.