4th Floor
115 West Street
Sandown
Sandton
2196

PRIVACY NOTICE

Introduction

Munnik Basson Dagama Incorporated Attorneys ('MBD', 'We', 'us' and 'our') cares about the privacy, security and integrity of our client's and customer's ('you' and 'your') personal information. We take our responsibility to protect your personal information very seriously. This Notice explains how we collect, use, share and protect your personal information, as required by applicable data privacy legislation). Using our services and any disagreements about your privacy are subject to this Notice.

As our business grows and changes, we may need to update this Notice to reflect those changes. If changes affect you personally, we will try to contact you directly because it is important to us that you understand how your personal information is used. Please ensure that the personal information we hold about you is current and correct.

This Notice sets-out how MBD will use your personal information and applies to any information, including personal and special personal information, you give to us or that which we may collect from third parties.

To help you understand this Notice, we include the explanations of the terms 'personal information' and 'process' as used in the applicable data privacy legislation:

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Personal Information and Special Personal Information is any information relating to an identifiable living or juristic person. Some examples are: race or ethnic origin, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity

number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

Process means any operation or activity, whether automated or not, concerning personal information, including: collection, receipt, recording, organisation, collation, disclosure, storage,

updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as

blocking, degradation, erasure or destruction of information. "Processing" will have a similar meaning.

1. How to contact us

If you have any comments or questions about this Notice please contact the us at 115 West Street, Sandton, South Africa or Lovinip@nutun.com.

2. Amendment of this Statement

It is your responsibility to check the MBD website often for updates to this Notice.

3. Privacy and indemnity

3.1. MBD takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Notice, our Client's instruction and applicable data protection legislation. It is important that you also take all necessary and appropriate steps to protect your personal information yourself (for example, by understanding your rights and being discerning about the personal information you choose to disclose)

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3.2. We have implemented reasonable technical and operational measures to secure the confidentiality, integrity and security your personal information.

3.3. You hereby indemnify and hold MBD harmless from any loss or damages that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information by MBD.

4. **Information which we may collect about you**

4.1. We may collect the following information about you:

4.1.1. your name, addresses, contact details, date of birth, identity/social security/registration number, banking details, cardholder information, company details, vat/tax number, consumer credit information, profile information, payroll information, account information, product information, judgements, defaults, transactional and financial information

4.1.2. records of correspondence or enquiries from you or anyone acting on your behalf;

4.1.3. details of any contracts applications and transactions;

4.1.4. sensitive or special categories of personal information, including health information, biometric information ethnicity and race

4.2. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Notice.

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5. **How we collect information**

5.1. You may provide personal information to us either directly or indirectly (via our Clients, Affiliates, Partners and Third Parties) by/when using their products and services or requesting further information about their products and services, whether in writing, over the telephone, through their websites, apps, social platforms, chat services or any other means.

5.2. We may also collect your personal information from our group entities and their partners, credit providers, service providers, vendors, operators, bureaus, or other third parties that may hold such information.

6.3 Some information is automatically collected:

When you use any of our digital channels like websites, social media platforms, customer portals, and apps we receive and store information generated by your activities (usage data gathered by cookies) and other information that are automatically collected from your browser or mobile device. Cookies help us learn how well our site, services and tools perform in different locations. We also use cookies to understand, improve, and research products, features, and services, including when you access our services from other websites, applications, or devices such as your work computer or mobile device. Most of this data is generally not personally identifiable. However, some of this data, either alone or when linked with other information, may allow your identity to be discovered. We treat this combined data as personal information and we protect it accordingly.

6.3.1 Cookies are small text files created when viewing a website. They gather usage data including information about the sites you visited, the number of times you visit, the date, time and length of your visit, which products or services you viewed and which areas of the site you visited. We may assign you one or more unique identifiers to help keep track of your future visits. We may use first-party or third-party cookies and web beacons to deliver content, including information relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness of the content given to you.

6.3.2 Other information automatically collected may include your IP address, preferred language, geographic location, operating system and computer platform.

6.3.3 Profiling and automated decision making may be used in certain instances. We may use automated decision-making processes, including profiling, to enhance the efficiency and personalization of our services. Automated decision-making for debt collection is primarily driven by

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data analysis, machine learning, and rule-based logic to optimize the recovery of debt. The underlying logic is based on utilising debtor attributes such as consumer information, customer interactions, financial behaviour, outstanding debt, account age, payment history, contact history and credit information to run predictive models and build profiles to largely predict propensity to pay and other generic predictive models. These models use rule-based logic combined with predictive scoring algorithms trained on historical data patterns to segment accounts and apply relevant collection strategies. The logic is governed by business rules, legal requirements and compliance standards, ensuring that actions taken are aligned with both responsible business practices and legislation to balance efficiency, compliance, and debtor engagement. These systems operate by analysing patterns in data and applying pre-defined rules to arrive at decisions. While these processes aim to improve user experience and operational effectiveness, some unintended consequences like algorithmic bias, system errors and subjective programming can produce unfair outcomes. MBD ensures that such processing is subject to appropriate safeguards, including the opportunity to object to automated processing and profiling and regular algorithmic testing and upgrading to mitigate bias.

6. **Use of information collected**

6.1. We may use, transfer, share and disclose your personal information for the purposes of:

6.1.1. providing you with services, products or offerings and keeping you informed;

6.1.2. updating information ensuring the currency and correctness of your account information;

6.1.3. processing orders, instructions, transactions and maintaining your account;

6.1.4. managing your account or contract/relationship on behalf of our Clients, Affiliates and Partners;

6.1.5. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;

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6.1.6. rendering customer services support, complaints handling, facilitating claims and dealing with admin requests;

6.1.7. operational, marketing, quality assurance, contractual and record-keeping requirements;

6.1.8. identifying you, verifying your identity or the identify of your beneficial owner;

6.1.9. transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud services;

6.1.10. complying with applicable laws, including lawful processing of information for law enforcement, bureaus, government agencies, tax authorities, regulatory and industry bodies;

6.1.11. recording and monitoring your telephone calls and electronic communications to/with MBD in order to render services, process instructions and measure quality;

6.1.12. conducting market research and providing information about our (including our Clients, Affiliates and Partners) products or services from time to time via our website, email, telephone, chats, media platforms or other means;

6.1.13. disclosing your personal information to third parties for reasons set out in this Notice or where it is not unlawful to do so;

6.1.14. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from MBD or any of its employees, agents or contractors, including monitoring, recording and using as evidence all communications between parties;

6.1.15. debt collection, tracing, administration and related purposes;

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6.1.16. credit reporting and prescribed purposes in terms of the National Credit Act;

6.1.17. statistical, historical and valuation purposes;

6.1.18. providing payment services and payroll services,

6.1.19. providing customer services support and marketing;

6.1.20. profiling and using automated decision making to provide predictive scoring into consumer profiles, payment behaviours and to improve customer experiences;

6.1.21. recommending and promoting products and services to customers; and

6.1.22. data analytics, modelling and enriching the accuracy and quality of our data

7.2 We may from time to time (and at any time) contact you about services, products and offerings available from our Affiliates/Partners or specific group subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by clicking here: https://unsub.tcmail.co.za/unsubscribe/check/

7. **Disclosure of your information**

Your personal information may be shared with other entities, our Agents and Sub-Contractors, Partners, Affiliates, Vendors and selected Third Parties, including Credit Providers, Credit Bureaus, Debt Collectors, and Service Providers who process the information on our behalf for the purposes set-out in 7 above.

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8. **Retention of your information**

We may retain your personal information unless you object, in which case we will only retain it if we are permitted or required to do so in terms of applicable laws. However, as a general rule, we will retain your information in accordance with contractual obligations and statutory retention periods set-out in applicable laws. We will continue to protect your personal information for as long as it is retained by us.

9. **Access to, correction and deletion of your personal information**

9.1. You may request details of personal information processed about you. You may also request access to the personal information held about you.

9.2. You may request the correction of personal information held about you. Please ensure that the information about you is complete, accurate and current.

9.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

9.4. You have a right to object on reasonable grounds to the processing of your personal information, including profiling and being subjected to automated decision making, unless the law provides for such processing.

9.5. Please review our PAIA Manual located on our website for requests for access made under the Protection of Personal Information Act and Promotion of Access to Information Act. Confirmation of whether or not we hold personal information about you may be requested free of charge.

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10. **Complaints**

10.1. Should you believe that MBD has utilised your personal information contrary to applicable laws, you should first attempt to resolve any concerns with us.

10.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

10.2.1. Tel: 012 406 4818

10.2.2. Fax: 086 500 3351

10.2.3. Email: enquiries@inforegulator.org.za