Welcome to GGV Koch t/a Kochco Finance. We believe you deserve the utmost respect when it comes to the security and use of your personal information, so we have described our Privacy Policy as clearly as possible in the summary below.

Our Privacy Policy applies to all current and former customers and may change from time to time. Please also read the Loan Terms and Conditions as uploaded to your user login profile on the website, www.kcfinance.co.za which provide further details of how we collect, process, and use your personal information and should be read together with this Privacy Policy.

1. INTRODUCTION

GGV Koch t/a Kochco Finance is an entity which is a registered credit provider, whose primary business is providing micro finance to the public.

GGV Koch t/a Kochco Finance is committed to sound business practices in compliance with all the relevant legislation, which for purposes of this Privacy Policy, includes the Protection of Personal Information Act 4 of 2013 ("POPIA") read with the Consumer Protection Act 68 of 2008, The National Credit Act 34 of 2005 and the Constitution of the Republic of South Africa.

2. PURPOSE, SCOPE & OBJECTIVES

The policy sets out the manner in which personal information of consumers, utilising GGV Koch t/a Kochco Finance' Website for purposes of applying for credit, is collected, managed, stored, used and protected by GGV Koch t/a Kochco Finance.

The objectives are to:-

- process personal information responsibly and lawfully in terms of the provisions of POPIA;
- provide a guideline as to the way GGV Koch t/a Kochco Finance processes and protects personal information;
- adopt good practices in terms of processing of personal information;
- display the commitment of GGV Koch t/a Kochco Finance to uphold and respect information privacy.

3. DEFINITIONS

"consent" means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.

"data subject" means the person to whom the personal information relates.

"personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; 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.

"processing" means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including-

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

"we"/"our" means GGV Koch t/a Kochco Finance

"responsible party" means a public or private body or any other person, which alone or in conjunction with others, determines the purpose of and means for processing personal information.

4. TYPE OF INFORMATION PROCESSED

GGV Koch t/a Kochco Finance may collect and process the following types of information during the credit application process and granting of credit:

- Biometric Fingerprint Information
- Bank statements
- Payslips
- Name and surname
- Household Expenses
- Identity number (including date of birth)
- Nationality
- Gender
- Marital status
- Homeowner status
- Race
- Contact details, including email address, telephone numbers, physical address
- Name, surname, contact details and relationship of client's next of kin
- Credit report
- Employment information

- Client payment reports
- Bank Account Details, including status and last deposit date
- Number of Dependants

5. LAWFUL PROCESSING OF PERSONAL INFORMATION

The conditions for the lawful processing of personal information by any responsible party

i.e. GGV Koch t/a Kochco Finance, as prescribed by the provisions of POPIA, are set out herein below. GGV Koch t/a Kochco Finance undertakes to comply with these conditions when processing personal information:

5.1 Accountability

GGV Koch t/a Kochco Finance will ensure that the conditions set out hereunder are given effect to and complied with at the time of processing of personal information. GGV Koch t/a Kochco Finance will remain accountable and takes responsibility for personal information in its possession and processed by it.

5.2 Processing limitation

GGV Koch t/a Kochco Finance undertakes to process personal information:

- lawfully; and
- in a reasonable manner that does not infringe the privacy of the data subject.

Personal information will only be processed if, given the purpose for which it is processed, it is in a manner that is adequate, relevant, and not excessive.

Personal information will only be processed if:

- the data subject or a competent person, where the data subject is a child, consents thereto. The responsible party bears the burden of proof for the data subject's or competent person's consent. The consent may be withdrawn at any time, provided that the lawfulness of processing personal information prior such withdrawal will not be affected;

- processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
- processing protects a legitimate interest of the data subject;
- processing is necessary for the proper performance of a public law duty by a public body; or
- processing is necessary for pursuing the legitimate interests of the responsible party of a third party to whom the information is supplied.

Personal information will be collected directly from the data subject, unless:

- the information is contained in or derived from a public record or has deliberately been made public by the data subject;
- the data subject is a competent person, where the data subject is a child, has consented to the collection of the information from another source;
- collection of the information from another source would not prejudice a legitimate interest of the data subject;
- collection of the information from another source is necessary;
- to avoid prejudice to the maintenance of the law by any public body;
- to comply with an obligation imposed by law or to enforce legislation;
- for the conduct of proceedings, in any court or tribunal, that have commenced or are reasonably contemplated;
- in the interest of national security; or
- to maintain the legitimate interests of the responsible party or of a third party to whom the information is supplied;
- compliance would prejudice a lawful purpose of the collection; or
- compliance is not reasonably practicable in the circumstances of the particular case.

5.3 **Purpose specification**

GGV Koch t/a Kochco Finance will collect the personal information for the following and related purposes:

- Application for credit
- Conducting an Affordability Assessment
- Obtaining a credit bureau report
- Fraud check
- Pre-agreement statement & quotation & credit agreements
- Debt collection
- Marketing if consent was obtained
- Compliance with legislation

Once personal information, processed and stored by GGV Koch t/a Kochco Finance, has reached its expiry date, or becomes in any way redundant, GGV Koch t/a Kochco Finance will destroy or delete the record of personal information in a manner that prevents its reconstruction in an intelligible form.

- GGV Koch t/a Kochco Finance will restrict the processing of personal information if:-
- the accuracy is contested by the data subject, for a period to enable the verifying of the personal information;
- the personal information is no longer needed for the purpose for which it was collected and processed, but maintained for purposes of proof;
- the processing is unlawful, and the data subject opposes its destruction, but requests the restriction of its use instead; or
- data subject requests the transmission of personal data into another automated processing system.

5.4 **Further processing limitation**

Any further processing of personal information carried out by GGV Koch t/a Kochco Finance will be done in accordance or compatible with the purpose for which it was initially collected.

5.5 **Information quality**

GGV Koch t/a Kochco Finance will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary.

5.6 **Openness**

- GGV Koch t/a Kochco Finance will maintain the documentation of all processing operations under its responsibility.

When personal information is collected, GGV Koch t/a Kochco Finance will take reasonably practicable steps to make the data subject aware of:-

- the information being collected or the source from which the information is collected;
- the name and address of the responsible party;
- the purpose for which the information is being collected;
- whether or not the supply of the information by that data subject is voluntary or mandatory;
- the consequences of failure to provide the information;
- any law authorising or requiring the collection of the information;
- the fact that, where applicable, the responsible party intends to transfer the information to a third country or international organisation and the level of protection afforded of the information by that third country or international organisation;
- any further relevant information.

5.7 **Security safeguards**

- GGV Koch t/a Kochco Finance undertakes to secure the integrity and confidentiality of personal information in its possession or under its control. This is done by taking appropriate, reasonable technical and organisation measures to prevent loss of damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information.

The following safeguards has been put in place by GGV Koch t/a Kochco Finance to secure the integrity and confidentiality of personal information:

- Physical access security to the building
- Password protection on Loan Management systems
- Password protection on all computer logins
- Anti-virus programmes on all computers, which are tested and updated monthly
- Firewalls
- External hard drive for backup purposes

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, GGV Koch t/a Kochco Finance will notify, as soon as possible after the discovery of the compromise:

- the Information Regulator; and
- the data subject unless the identity of such data subject cannot be established.

GGV Koch t/a Kochco Finance will notify the data subject in writing of the unauthorised access to or acquiring of its personal information and provide sufficient information to the data subject to take protective measures against the potential consequences of the compromise.

5.8 Data subject participation

Any queries or concerns regarding this Privacy Policy, your information held, corrections or deletion of personal information or updating personal information, please contact us on enquiries@kcfinance.co.za.

6. COLLECTION OF INFORMATION

GGV Koch t/a Kochco Finance collects personal information in the following manners:

- Credit Applications
- Credit bureaus
- Voluntary disclosure by data subject
- Website
- Telephonically
- Email

Your Consent

By submitting your details and/or using our service you accept this Privacy Policy and expressly provide voluntary, specific, and informed consent to the use and disclosure of your personal information in the manner described below. You have the right to object to our use of your personal information. Depending on the information you object to, we may not be able to proceed with your loan application/s as certain information is required for the conclusion or performance of this contract and we are obliged by law to obtain same.

Security and Confidentiality

We understand the value of your personal information and therefore will take all reasonable steps to protect your personal information from loss, misuse, or unauthorized alteration. Your personal information is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of that information.

We recognize the need for appropriate protection and management of the personal information you share with us. We protect that information using secure socket layer (SSL) encryption technology and by limiting employee access on a need-to-know basis. We store data in encrypted form on computers and control access via secure web pages. We employ firewalls and other security technologies to protect our servers from external attack.

Our security systems meet or exceed industry standards and we are constantly monitoring internet developments to ensure our systems evolve as required. We also test our systems regularly to make sure our security mechanisms are up to date.

Finally, we are subject to South African data protection laws, including the Constitution of the Republic of South Africa 1996, Protection of Personal Information Act 2013, the Electronic Communications and Transactions Act, 2002, the Regulation of Interception of

Communication Act 2002, the National Credit Act 2005 read with the National Credit Amendment Act 2014 and the Consumer Protection Act 2008 which we comply with fully and give the greatest respect.

Personal Information

Personal information is information that identifies or relates specifically to you including your financial information, for example, your name, age and identity number, your assets and liabilities, your income, and your payment records. In short, any information that we know about you will be regarded as your personal information.

Collecting of Data

We collect information about you in two ways - directly from your online application and from outside sources such as credit bureau and customer service providers. We may use data that identifies your personal information for a number of things including: statistical analysis; to develop and improve our products; to assess lending risks; to update your records; to identify which of our products, or our partners' products which might interest you; to identify and prevent fraud, money laundering and other criminal activities; to carry out regulatory checks, keeping you informed about your loan, and for market research; and in the products and services which we offer on behalf of third parties.

Collection and Use of Personal Information

To make your use of this loan product and electronic service offered by GGV Koch t/a Kochco Finance as successful as possible, it is necessary for us to find out exactly what you need and want from us and to ascertain whether in terms of the provisions of the National Credit Act you are eligible to get a loan. The following are some of the reasons why we would collect your personal information:

- to identify you;
- in order for us to process your instructions or requests;

- in order for us to ensure that you meet our lending criteria, we may collect and analyze your personal information and combine all the information that we have about you to compile a credit profile of you in order for us to grant you a loan and to meet your specific needs;
- once we have collected and analyzed your personal information, we may send you promotional material or details which we think may be of interest to you but will only do so with your permission. If any of this promotional information relates to products, promotions, news or services of a third party, and if you indicate that you would like more details, we may inform the third party to contact you directly. We will, however, only inform a third party to contact you directly if you have indicated that this is agreeable to you.

In addition, we utilize your personal information for the other purposes set out in this Privacy Policy.

Additional data collection

In addition to the personal information you submit, we may collect information about your computer including, where available, your IP address, operating system and browser type - for system administration and to report aggregate information to our advertising partners which allow Us to have a better understanding of Our customer requirements and/or preferences by using cookies to track users as they travel from website to website recording what commercial advertisements they view and select while browsing.

This is statistical data about browsing actions and patterns and does not identify any individual. We may also obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies enable us to improve our service to you, estimate our audience size and usage patterns, store information about your preferences and recognize you when you return to our site.

You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy full use of the site and you may not be able to take advantage of certain promotions, we may run from time to time. Please note that third parties who advertise on our site may also use cookies, but we do not have access to, or control over them and therefore cannot take responsibility for them. All advertisers are bound by contract to maintain the confidentiality and security of your personal information and are restricted in their use thereof as per this Privacy Policy.

We want to provide you with the best possible service, so calls to GGV Koch t/a Kochco Finance will be recorded and/or monitored for quality checks and staff training. Recordings may also be used to help us combat fraud.

This website uses Google Analytics Premium, a web analytics service provided by Google Ireland Limited ("Google"). Google Analytics Premium uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookies about your use of the website and your current IP-address will be transmitted by your browser to and will be stored by Google on servers in the United States and other countries.

On behalf of the operator of this website Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address collected through Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You may also stop the transmission of information generated by the cookies about your use of the website and of your IP address to Google, by downloading and installing the Google Analytics Opt-out Browser Add-on available here: http://tools.google.com/dlpage/gaoptout.

"PIN"

When you use the GGV Koch t/a Kochco Finance' Website and the services provided by us, you will log into your user profile with your username and password created by yourself. You are responsible for maintaining the secrecy and confidentiality of your username, and password and/or personal identification number ("PIN").

Sharing your data for service provision

We share the data you submit with third parties involved in the process of providing the services you request, such as lenders, credit bureaus, customer service providers and collection agencies. We have trusted relationships with these carefully selected third parties who perform services on our behalf. All service providers are bound by contract to maintain the confidentiality and security of your personal information and are restricted in their use thereof as per this Privacy Policy. The service provider is required to notify us immediately where there are grounds to believe your personal information has been accessed or acquired by any unauthorized person.

By clicking the "I Accept" box, beneath the loan agreement and direct debit mandate you hereby agree that we may disclose your personal information:

- In the event we sell or buy any business or assets (in which case we may disclose your personal information to the prospective seller or buyer of such a business or assets)
- If our business or substantially all its assets are acquired by a third party (in which case personal information held about customers will be one of the transferred assets)
- If we have a duty to disclose your personal information in order to comply with a legal request, or in order to enforce any of our terms and conditions

Foreign Parties

Because we work with some carefully selected partners outside of South Africa - to offer you our loans service - we may also need to transfer your personal information abroad. If and whenever this is the case, we will ensure the information is held securely to standards as least as good as those in South Africa and is only used for the purposes set out in this policy.

Right to request access to your personal information

As aforementioned, we are committed to the protection of your personal information and any information disclosed to third parties is only done so with our knowledge and express authorization. You are entitled to request access to your information at a prescribed fee and to request that inaccurate, irrelevant, excessive, outdated, misleading or unlawfully obtained information be corrected, deleted or in the case of a dispute, indicate that a correction has been requested, but not made.

Electronic Communications and Transactions Act

We also voluntarily subscribe to the principles, outlined in Section 51 of the Electronic Communications and Transactions Act 2002 ('ECT Act'), which govern your right to having your personal information kept private. We briefly outline these principles below:

- We will only collect, collate, process and store ('use') your personal information with your permission as set out in this Privacy Policy, unless legally required to do so, and will only use such information for the lawful purpose for which it is required as set out in this Privacy Policy.

- We hereby disclose in writing, the specific purpose for which we use, request, and store your personal information. We will also keep a record of that personal information and the specific purpose for which we have used it.
- We will not use your personal information for any purpose, other than that which we disclosed to you herein, unless you give us your express written permission to do so, or unless we are permitted/required to do so by law.

Further to the requirements of the ECT Act, we will disclose your personal information without your consent

- If we are required to do so by law or a court order;
- If disclosure is in the public interest;
- If disclosure is in GGV Koch t/a Kochco Finance' interest;
- With your implied consent.

In terms of the Consumer Protection Act and section 45 of the ECT Act, you understand that you have the option to opt out of any mailing list maintained by GGV Koch t/a Kochco Finance for commercial and marketing communications (see the next paragraph for more information on how to opt out).

Contact from GGV Koch t/a Kochco Finance and third parties

As part of the application process, we ask you whether we or any of our partners may contact you about our products and services by telephone, post, email, and SMS (or other reasonable method). If you ticked "yes" but no longer wish to receive such communications, please visit the My Account page, login and change your communication preference at any time, or follow the instructions in the message itself.

You may also register on the National "Opt Out" register of the Direct Marketing Association of South Africa by going to www.dmasa.org.

We may transfer your personal information to selected third parties (see "Selling and disclosing your data to third parties" above). If at any time you wish to stop receiving such contact from a third party, you will need to follow the instructions about unsubscribing provided at that time by the third party. Please note that we only partner with trusted

companies who will respect your right to unsubscribe from any such marketing communications, but we will not be responsible for managing that process or any disputes.

Third party links

Our site may contain links to third party websites. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them. By registering at GGV Koch t/a Kochco Finance you may receive follow-up contact and offers from third party companies as you have agreed to do by accepting this Privacy Policy and, while we only work with selected partners, we are not responsible for the services or representations of third parties.

Because we are not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to this website or websites facilitated by us), we do not exercise control over third parties' privacy policies, and you should refer to the privacy policy of any such third party to see how such party protects your privacy.

Age

To register with us you must be 18-years of age or older. Minors are strictly forbidden from using the service.

Changes to this Privacy Policy

We reserve the right, in our sole discretion to update, modify or amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time with or without notice. You therefore agree to review the Privacy Policy whenever you visit the GGV Koch t/a Kochco Finance Website for any such change. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

Which laws apply?

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Privacy Policy, we both submit to the jurisdiction of the South African courts.

Who to Contact?

Should you have any queries, please contact Us, GGV Koch t/a Kochco Finance, on 022 001 0608 or enquiries@kcfinance.co.za.