

THE PROTECTION OF PERSONAL INFORMATION ACT CUSTOMER | CLIENT PRIVACY NOTICE

At Bond Perfect (including this website, POPI Act-Compliant) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently. Please read the full privacy policy as it applies to you.

Introduction

We Are Bond Perfect (Pty)Ltd- Registration Number: 2017/268976/07)

This policy outlines Bond Perfect's privacy policy that applies when Bond Perfect as a company and or our employees obtains and uses information belonging to customers /clients ,service providers suppliers and other third parties. It has been prepared with reference to internal business practices and applicable laws such as the Protection of Personal Information Act 4 of 2013 ("POPI"). It applies uniformly to Bond Perfect and business units of Bond Perfect, specifically including processing relating to:

- a) Credit Assessments And Reports
- b) Marketing And Promotions
- c) Consumers and Third Parties
- d) Social Media
- e) Supplier and Service Provider Procurement
- f) Customer Complaints and Dispute Resolution
- g) All general processing of personal information for legitimate business purposes in compliance with the law

What is meant by Personal Information Collected?

- a) Information that we collect automatically when you visit our website
- b) Information collected on registration
- c) Information collected on form submission
- d) Optional information that you provide to us voluntarily

Which Personal Information Is Excluded?

- a) Information that has been made anonymous so that it does not identify a specific person
- b) Information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

This Policy Applies To:

a) Website Visitors, Customers And Or Clients

A visitor to our website, a customer or client who has requested the services that we provide, submitted any online application form or accepts our goods or services.

b) Marketing

This policy applies to any and all marketing and advertising initiatives and promotions undertaken, whether online or otherwise, relating to the specific services we offer (home loan pre-qualification advise and applications, formal home loan / bond applications, insurance quotations, consulting services or the provision of value added and financial services by Bond Perfect.

Bond Perfect take steps to ensure that marketing and advertising initiatives undertaken:

- a) project Bond Perfect's image, values and ethics satisfactorily;
- b) are appropriate to the circumstances and the intended audience;
- c) are non-discriminatory and respectful;
- d) are mindful of an individual's right to privacy and the rights when receiving unsolicited communications;
- e) are aligned with Bond Perfect's strategic objectives;
- f) are factually accurate and are compliant with all applicable legal and regulatory requirements and standards;

When marketing to customers and potential customers, Bond Perfect offers an opt-out functionality to allow anyone who receives marketing material to opt out from future communications from Bond Perfect. Please note that our business operate as business units, and an opt-out will therefore apply to the specific businesses who sent the marketing material.

The law does not require consent for all marketing, but where consent is required, Bond Perfect will only do marketing with the necessary consent.

Bond Perfect, our authorised service providers and contractors will not sell your personal information to third parties for marketing or any other purpose.

How Information Is Collected On Our Website

Bond Perfect ("we" or "us" or "our") may use cookies, web beacons, tracking pixels, and other tracking technologies when you visit our website [www.bondperfect.co.za], including the use of any other forms of media, media channels, mobile applications related or connected thereto as well as online application, registration, appointment and contact forms which can be voluntarily submitted by you. Please read our Cookie Policy for more information: <https://bondperfect.co.za/cookie-policy/>

General POPI Principles Applying To Consumer And Third Party Information

(1) PERSONAL INFORMATION

In this policy "Personal Information" or "information" means information about a person, including both natural and juristic persons being customers, potential customers, suppliers, and other third parties (collectively referred to as "Data Subjects"), that can be used to identify the Data Subject. Personal Information includes, amongst others, name, identifying numbers, address, contact information, banking information and all other personal information as defined in POPI.

(2) COLLECTING PERSONAL INFORMATION

As far as possible, Personal Information is collected directly from the Data Subject, but may also be collected from the following sources if it cannot be collected directly from the Data Subject:

- a) Government organisations and public bodies;
- b) The internet and media, including online and social media platforms;
- c) Marketers and third party suppliers of products or services relating to Bond Perfect's products and services. If the information will be used for marketing purposes, the third party from whom we collect, may only share it if the law allows for the sharing;
- d) Credit or information bureaus for the purposes of information verification related to applications for credit and credit affordability assessments or to update contact details;
- e) Family or friends;
- f) Public resources;
- g) Business partners with whom we have trusted relationships;
- h) Other third parties if the law allows it.

(3) SANCTION SCREENING

Financial sanctions prohibit an organisation from carrying out transactions with a listed individual or organisation (target). It is essential that an organisation performs financial sanctions checks against the lists applicable to the business.

You consent and agree that, if we are required by the Financial Intelligence Centres Act (FICA) to do so, then:

1. We may process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists.
2. You also consent to us communicating such personal information to local and international Regulatory Bodies as well as to other entities in Bond Perfect and our partner financial institutions if you are matched to one of these sanctions lists.

(4) RESPONSIBILITY

Bond Perfect shall assume all the responsibilities of a "Responsible Party" in terms of POPI (this is the party that determines the purpose of and means for processing Personal Information). This applies from the time that the Personal Information is obtained the first time until it gets destroyed.

(5) PROCESSING

Personal Information will be collected and processed lawfully and in accordance with all laws that apply to Bond Perfect as a registered company.

The following are some of the laws that require us to collect and keep personal information:

- The Electronic Communications and Transactions Act (ECT)
- The Financial Intelligence Centre Act (FICA)
- The Financial Advisory and Intermediary Services Act (FAIS)
- The National Credit Act (NCA)
- The Consumer Protection Act (CPA)
- Long-term Insurance Act (LTIA).

(6) MINIMALITY

Only Personal Information that is necessary, related to or relevant to the reason for which Bond Perfect intends to use it will be obtained and processed by Bond Perfect. We will not ask for more information than required in the circumstances.

(7) PURPOSES FOR PROCESSING PERSONAL INFORMATION

Bond Perfect will process Personal Information for the following purposes in compliance with applicable laws:

- a. to perform in terms of an agreement or intended agreement to which Bond Perfect is a party;
- b. for any legitimate purposes related to the relationship with us and our employees;
- c. to process credit record checks, reports and applications;
- d. to manage your relationship with us and any related third parties, such as finance houses etc.;
- e. to contact you for marketing purposes;
- f. for internal business purposes, which includes:
 - i. administrative and operational tasks;
 - ii. monitoring our business, carrying out market and statistical research, and for business development;
 - iii. financial management, business audits and analyses, and fraud prevention;
- iv. compliance with legal requirements;
- g. to comply with reporting and other legal obligations in terms of contracts or the law;
- h. any other purpose if the law allows or requires it.

(8) MARKETING

Bond Perfect may use your Personal Information to provide you with information regarding any of our other related products, services, or events from time-to-time. You may however request that Bond Perfect stop sending you such information or request that your Personal Information is removed from Bond Perfect's mailing list at any time by send us an email to: finance@bondperfect.co.za

When you opt-out of receiving marketing information, Bond Perfect may still contact you when it is necessary for our relationship with you, such as performing in terms of our agreement with you, providing you with necessary information, or if required or allowed by law.

(9) DISCLOSURE AND USE OF PERSONAL INFORMATION

Bond Perfect will not use or disclose Personal Information to any third party for any purpose other than the purpose for which the information was collected, without obtaining the necessary consent to do so or to the extent that legislation permits or requires.

Bond Perfect will disclose Personal Information to regulatory authorities, accountants, auditors, lawyers or professional advisors if contractually required to or legal obligated to.

Information may also be shared with third party service providers, specifically but not limited to, **MORTGAGE MAX and BETTER LIFE**, whose products or services are related to or connected with the products or services supplied to you by Bond Perfect.

Bond Perfect will also transfer information to third parties if it sells any portion of its business or assets.

Information may be shared with approved Bond Perfect Service providers or subcontractors when and if required to in order to fulfil our obligations to you. However, information will only be transferred to these third parties when and if all the required and relevant confidentiality and data security undertakings and legal requirements have been contractually accepted and agreed to in writing and in the event of a transfer of Personal Information to any third party, details of the transfer will only be retained for as long as is required to fulfil contractual obligations and as allowed or required by law.

(10) CONSENT

Where you have provided consent for Bond Perfect to process your Personal Information, you may also withdraw your consent where and if our processing or marketing has been based on your consent. Personal Information may continue to be processed when and if legal justification exists for the processing.

In instances, where consent is required in order to process your Personal Information, refusal to provide consent may result in Bond Perfect not being able to maintain the relationship with you, unless other legal grounds to lawfully process your Personal Information without consent exists.

(10) PUBLIC DISCLOSURE OF PERSONAL INFORMATION

Unless the law requires or provides otherwise, Bond Perfect will only make Personal Information public with your express consent to do so.

(11) RETENTION PERIODS

Bond Perfect takes reasonable steps to only process Personal Information for the minimum period necessary and retains information in accordance with the retention periods required by law and as described in this policy. Information that is no longer required for the purposes for which it was collected will be destroyed.

(12) SECURITY

All reasonable measures will be taken to ensure the security, integrity and confidentiality of Personal Information that we hold by taking appropriate, reasonable, technical and organisational security measures to protect Personal Information and prevent accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing.

Bond Perfect cannot be held liable for any losses or damages that may occur as a result of security breaches unless directly attributed to the gross negligence or misconduct on the part of Bond Perfect or any of its employees, contractors or service providers.

(13) SECURITY BREACH

In the event of a security breach of any Personal Information, Bond Perfect will notify all affected Data Subjects and the applicable regulatory authorities of the breach. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your Personal Information, kindly notify us by sending an email to finance@bondperfect.co.za

The internet is an open and often vulnerable system and the transfer of information via the internet is not completely secure. Although we will implement all reasonable measures to protect Personal Information, we cannot guarantee the security of your Personal Information transferred to us when using the internet.

Therefore, you acknowledge and agree that any transfer of Personal Information via the internet is at your own risk and you are responsible for ensuring that any Personal Information that you send is sent securely.

(14) THIRD PARTY INFORMATION AND WEBSITES

Bond Perfect is not responsible for and gives no warranties, undertakings and makes no representations in respect of the privacy policies or practices of any websites linked to Bond Perfect's website. Your use of and reliance on these links is at your own risk.

(15) OBJECTION TO PROCESSING

You may, on reasonable grounds, object to Bond Perfect using your Personal Information for certain purposes. If you object, we will stop using your Personal Information and delete it, except if applicable laws allow its use or retention. To exercise this right or to discuss it with us, please send us an email to: finance@bondperfect.co.za

(16) QUALITY OF PERSONAL INFORMATION

We want to ensure that your Personal Information is accurate and kept up to date. You may ask us to correct or remove any Personal Information that you think is inaccurate, by sending us an email to finance@bondperfect.co.za It is your responsibility to update us if any of your Personal Information changes.

(17) ACCESS TO PERSONAL INFORMATION

You have the right to request whether Bond Perfect holds any Personal Information about you. If you would like us to provide you with the Personal Information that we hold about you, you may send in a request in the prescribed format and email it to finance@bondperfect.co.za

This request may be subject to you verifying your identity and the rights that you are wishing to exercise. We may charge an administration fee in terms of applicable laws. We will provide you with the requested information, or if in terms of the law we are not required to share the information with you, we will inform you accordingly as soon as it is reasonably possible, but no later than 30 days after your request has been received.

(18) COMPLAINTS

If you want to raise any objection or have any queries about our privacy practices, you can contact our data protection officer on finance@bondperfect.co.za In the event that you believe that Bond Perfect or any of its divisions or business units have infringed on any of your rights or have contravened the provisions of the POPI ACT in any manner that has prejudiced you, you have the right to raise your complaint in the prescribed format with the Information Regulator of South Africa.

Details on how to lodge a complaint may be obtained from <http://www.justice.gov.za/inforeg>, and complaints can be submitted to the Information Regulator of South Africa with the following contact details:

Address: Braampark Forum,
Forum 3, 3rd Floor
33 Hoofd Street,
BRAAMFONTEIN
Complaints email: complaints.IR@justice.gov.za
General enquiries email: inforeg@justice.gov.za
Fax: 086 500 3351

Social Media

Bond Perfect encourage all of their employees to explore and engage in social media interactions, but in a manner that is respectful, responsible and with sound judgement and common sense. At all times, they are expected to adhere to Bond Perfect's values, and ensure that they follow the Policies and Procedures that apply to Social Media interaction.

Please note that if you communicate with us through a Social Media channel, we may use the same channel to communicate back to you. This also applies to communications regarding a sales or service contract, for example sending documentation over WhatsApp. Using social media channels may expose your information to security risks, and by choosing to use these channels, you accept this risk.

Supplier Procurement

- a. We deploy the services of suppliers, representatives and service contractors from time to time for marketing and or promotions of pre-qualification applications, home loan/bond applications, insurance quotations, sales and other related financial or consulting services
- b) Bond Perfect endeavour to ensure that all such representatives, service providers and suppliers of the above services or products are assessed and vetted to ensure that they comply with:
 - i. All the required criteria to ensure that the services and products being provided offer the value and are of the standard and quality that would be expected from Bond Perfect
 - ii. All legislation relevant to the services and/or products that are to be supplied or provided;
 - iii. All Regulatory Bodies relevant to the service and/or products to be supplied or provided;
 - iv. The Codes of Good Practice for Broad Based Black Economic Empowerment.

All suppliers, representatives , contractors and other service providers to Bond Perfect will be required to enter into a service level agreement with Bond Perfect to regulate the way in which service providers will use personal information accessed or used as a result of the Bond Perfect relationship. All representatives and service providers are required to implement the security measures as prescribed by POPI.

Customer Complaints and Dispute Resolution

Bond Perfect is bound by the Consumer Protection Act 68 of 2008 and The Financial Advisory and Intermediary Services Act (FAIS)

Should you be dissatisfied with your experience with Bond Perfect, our employees and or any of our representatives or service providers, please forward the details of your complaint to our Head Office at finance@bondperfect.co.za for further investigation.

Alternatively you may refer the matter to The Information Regulator Of South Africa. The correct process to lodge a complaint can be located on their website at <https://inforegulator.org.za/>

Alternatively, they can be contacted on:

The Information Regulator (South Africa)
33 Hoof Street
Forum III, 3rd Floor Braampark
P.O Box 31533
Braamfontein, Johannesburg, 2017
Complaints email: complaints.IR@justice.gov.za

Transferring Of Personal Information Outside South Africa

Bond Perfect may use cloud storage services which will result in your information being transferred to online storage. We will not transfer any personal information across a country border without your prior written consent.

We will only transfer Personal Information to third parties in South Africa with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPI.

Policy Alterations

Bond Perfect reserves the right to alter the terms and conditions of this policy at any time, provided that we act within all required and applicable privacy protection laws.

Your Responsibilities

Authority To Act On Behalf Of Other Individuals

You declare that when you provide us with personal information about your spouse, your dependants and or family members, which may include a person under 18 (a minor), you have received their permission or the necessary permission from the guardian of the minor person to share their personal information with Bond Perfect.

You understand that when you include and submit your spouse and or dependants personal information on any Bond Perfect form, we will process their personal information for the purposes of you being a customer /client of Bond Perfect,

The latter includes applying for a pre-approval, a home loan, credit check and reports, insurance, account opening, FICA, whichever is applicable and to pursue their legitimate interests. We may furthermore process their information for the purposes set out in this Privacy Statement and other related purposes.

Review Of Changes To Our Policy

You will be responsible for reviewing any such changes each time you access the websites and your continued use of the website after changes have been posted online, which constitutes your acceptance of this policy as modified by the posted changes –

Updated On 30 May 2022.