

Privacy and Data Collection Policy

Entity: **VO CONNECT (PTY) LTD**

Version 1.0 Effective Date: 30/10/2025

Signed by CEO: _____

1. Introduction and Scope

This Privacy and Data Collection Policy ("the Policy") pertains to VO Connect (Pty) Ltd (Registration Number: 2013/094193/07) and its subsidiaries (hereinafter referred to as "VO Connect", "the Company", "we", "our"). By engaging with our services, goods, and/or products, you acknowledge and agree to the processing of your personal information as detailed in this Policy.

2. Our Commitment to Data Protection

VO Connect is fully committed to complying with the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), which was fully implemented on 1 July 2021. We treat the protection of your privacy and personal information with the utmost importance and have implemented appropriate measures to safeguard it.

3. Dual Purpose: Policy and Notification

This document serves as our comprehensive Privacy Policy. Simultaneously, it fulfils our obligation as a data subject notification in accordance with Section 18 of POPIA, informing you about the nature of the personal information we collect, the purposes for which it is collected, how it is utilised, and the security measures employed for its protection.

4. Definition of Processing

The term "process" or "processing" in this Policy encompasses any operation or activity concerning your personal information, including its collection, receipt, recording, organisation, storage, updating, modification, retrieval, consultation, use, dissemination by means of transmission, distribution, or making available, merging, linking, as well as restriction, degradation, erasure, or destruction. We will only process your personal information where it is necessary to deliver a service, provide a product, or execute a transaction.

5. Combined Information

We may consolidate personal information obtained from different sources and use this combined information for the purposes set out in this Policy.

6. Policy Amendments

We reserve the right to amend this Policy periodically to reflect changes in the law or our business operations. The version of the Policy available on our website at the time of your interaction with us is the version that will govern that interaction.

7. What Constitutes Personal Information?

Personal information is any information that can be used to identify you, or that is linked to you. This includes, but is not limited to:

- a. Identity and Contact Details: Name, identity number, physical address, postal address, telephone number, email address, online identifiers.
- b. Demographic Information: Age, gender, race, ethnic origin, nationality, language, marital status.
- c. Biometric Information.
- d. Views and Opinions: Personal views, preferences, and opinions.
- e. Private and Sensitive Information: Religious or philosophical beliefs, sexual orientation, sex life, political persuasion, trade union membership, physical or mental health, medical history, criminal history, well-being, disability, pregnancy.
- f. Socio-Economic Information: Employment history, financial history, education, social origin.
- g. Location Information.

8. Voluntary and Mandatory Provision of Information

a. Mandatory Information:

The provision of certain personal information is mandatory as required by various South African laws. Failure to provide this information will prevent us from fulfilling our legal obligations and, consequently, from conducting business with you. The relevant legislation includes, but is not limited to:

- i. The Companies Act, No. 71 of 2008
- ii. The Protection of Personal Information Act, No. 4 of 2013
- iii. The Electronic Communications and Transactions Act, No. 25 of 2002
- iv. The Employment Equity Act, No. 55 of 1998
- v. The Basic Conditions of Employment Act, No. 75 of 1997
- vi. The Income Tax Act, No. 58 of 1962
- vii. The Value Added Tax Act, No. 89 of 1991
- viii. The Consumer Protection Act, No. 68 of 2008
- ix. And other applicable legislation as listed in the previous draft.

b. Voluntary Information:

In other instances, the provision of personal information is voluntary. However, this information is typically required for us to effectively deliver our products and/or services. Therefore, if you choose not to supply this voluntary information, we may be unable to do business with you.

9. Lawful Basis for Processing

We will only process your personal information lawfully and for legitimate business purposes, which include when:

- a. You have provided your consent;

- b. It is necessary for the performance of a contract with you;
- c. It is required to comply with a legal obligation;
- d. It is necessary to protect your legitimate interests, our legitimate interests, or the legitimate interests of a third party; or
- e. Processing is carried out by a person legally authorised to do so on your behalf.

10. Special Personal Information

Special personal information is data which relates to your:

- a. Religious or philosophical beliefs;
- b. Race or ethnic origin;
- c. Trade union membership;
- d. Political persuasion;
- e. Health, including physical or mental health, or biometric information;
- f. Sex life or sexual orientation; and
- g. Criminal behaviour.

11. Processing of Special Personal Information

We will only process your special personal information under specific conditions, such as:

- a. You have provided explicit consent;
- b. The processing is for human resource or payroll purposes;
- c. The processing is necessary for the establishment, exercise, or defence of a right or obligation in law;
- d. The information has been deliberately made public by you;
- e. The processing is for statistical or research purposes and meets all legal safeguards;
- f. The processing is required by law; or
- g. Specifically for racial information used for identification, or health information used for insurance risk assessment, policy compliance, or claim enforcement.

12. Sources of Personal Information

We may collect personal information about you from various sources, including:

- a. Directly from you;
- b. Publicly available records;
- c. Your public disclosures;
- d. Your use of our products, services, or service channels;
- e. Your interactions with us (e.g., support queries, surveys, correspondence);
- f. Third parties, where you have consented thereto or where the law permits.

13. Categories of Third-Party Sources

Third parties from whom we may collect information include, but are not limited to:

- a. Our business partners;
- b. Your family, employer, or associates (e.g., spouse, dependents);
- c. Service providers (e.g., couriers, payment processors, banks);
- d. Law enforcement, fraud prevention agencies, and regulatory bodies;
- e. Attorneys, debt collectors, and tracing agents;
- f. Insurers, brokers, and other financial institutions;
- g. Courts of law or tribunals.

14. Purposes for Processing Your Personal Information**

We process your personal information for a range of purposes essential to our business, including:

- a. Providing you with products, goods, and services;
- b. Marketing our offerings to you (subject to your consent where required);
- c. Responding to your enquiries and resolving complaints;
- d. Conducting market research, credit, and risk analysis;
- e. Developing, testing, and improving our products and services;
- f. Complying with legal, regulatory, and reporting obligations;
- g. Processing payments and creating payment instruments;
- h. Conducting security verification and accuracy checks;
- i. Administering insurance and assurance policies and claims;
- j. Facilitating customer loyalty programmes;
- k. Assessing lending and insurance risks; and
- l. For any other related lawful business purpose.

15. Marketing

We may use your personal information to inform you about our products and services via post, telephone, or electronic means (e.g., SMS, email).

Where required by law (e.g., if you are not an existing customer), we will only send electronic marketing communications with your consent.

You have the right to opt-out of receiving marketing communications from us at any time.

16. Sharing of Personal Information

We will not share your personal information with third parties unless:

- a. You have provided consent;
- b. It is necessary for the performance of a contract with you;
- c. We are legally obligated to do so; or
- d. It is necessary to protect a legitimate interest of you, us, or a third party.

17. Cross-Border Transfers of Information

Your personal information may be transferred to third parties in other countries under the following circumstances:

- a. Where the recipient country's laws, or an agreement with the recipient, ensures adequate protection;
- b. Where the transfer is necessary for the performance of a contract with you or in your interests;
- c. Where you have consented to the transfer; or
- d. Where it is not reasonably practical to obtain your consent and the transfer is in your interest.

Such transfers will be conducted in compliance with POPIA, and we will ensure that the recipient is bound to a similar or superior level of data protection.

18. Security Measures

We implement appropriate and reasonable technical and organisational security measures to protect your personal information, in line with industry best practices.

These measures include:

- a. Securing our computer systems and networks;
- b. Safe and secure storage of physical and electronic records;
- c. Controlling access to our premises, systems, and records; and
- d. Secure destruction or deletion of data that is no longer needed.

19. Retention of Personal Information

We will retain your personal information only for as long as:

- a. It is required by law;
- b. It is necessary for the purpose for which it was collected;
- c. It is required for statistical, research, or historical purposes;
- d. It is needed for our legitimate business interests; or
- e. You have consented to its retention.

Please note that we may retain personal information even after your relationship with us has ended, for instance, to meet historical data requirements for an employer or employee.

20. Use of Cookies

- a. What are Cookies?

A cookie is a small text file that is stored on your device (computer, smartphone) when you visit our websites or use our applications. Cookies personalise your experience, help us improve our services, identify your device, and assist in fraud prevention and analytics.

- b. Your Agreement.

By using our websites or applications, you consent to the use of cookies as described.

21. Your Rights and Responsibilities

You have certain rights and responsibilities regarding your personal information:

- a. You must provide proof of identity when requesting to enforce your rights.
- b. You must keep your personal information up to date.
- c. To exercise any of the rights below, please contact our Information Officer using the details in Section 21(v).

- i. Right of Access:

You may request access to the personal information we hold about you, including confirmation of its existence, a description or copy of the record, and details of third parties who have accessed it. We will respond within a reasonable time and may charge a permissible fee for this service. Please note that your right of access may be limited in terms of the law.

- ii. Right to Correction or Deletion:

You may request that we correct or delete your personal information if it is inaccurate, misleading, or obtained unlawfully. Such requests must be made in writing. It may take up to 15 business days for changes to reflect on our systems. We may require supporting documentation. Note that

deletion of certain information may impact our business relationship, and we cannot delete information we are legally required to retain.

iii. Right to Object to Processing:

You may object, on reasonable grounds, to the processing of your personal information. We may not be able to comply with your objection if the processing is required by law, is based on your consent, or is necessary for the performance of a contract.

iv. Right to Withdraw Consent:

Where processing is based on your consent, you may withdraw that consent at any time. We will inform you of the consequences of withdrawal. We may continue processing if permitted or required by law.

Withdrawal may take up to 15 business days to process.

d. Complaints and Contact Information:

You have the right to lodge a complaint with us or the Information Regulator regarding an alleged infringement of data protection laws.

e. Information Regulator Contact Details:

Email: POPIAComplaints@inforegulator.org.za

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Physical: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

f. Our Contact Details:

Business Name: VO Connect (Pty) Ltd

Registration Number: 2013/094193/07

Registered Address: Unit 12, La Gratitude Office Park, 97 Dorp Street, Stellenbosch, WC

Postal Address: PO Box 15, Stellenbosch, 7600

Telephone: 087 050 1000

Information Officer: CEO

Deputy Information Officer: CFO / MD

Email: info@voconnect.co.za

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Final Audit Report

2025-10-30

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