

FIRST RIVER

CAPITAL

CLIENT INFORMATION PROCESSING POLICY

We are committed to protecting your privacy. We recognise our obligation to respect and protect the confidentiality of your personal information. For this reason we have developed this policy to govern the processing of your information. Please read and consider this document carefully since it sets out our intended use of such information. We may require your consent to the terms contained in this policy before we permit you to use our site or participate in our services. As a condition for using our web site and services you will be required to agree that we may collect, hold, process, use and disclose your personal information on the basis described in this policy.

WHO WE ARE

When we refer to “we”, “us” or “our” herein we are referring to FirstRiver Capital (Pty) Ltd, a company incorporated under the laws of the Republic of South Africa. Our principal place of business is at 21 Martinson Road, Mostertsdrift, Stellenbosch, 7600 but we recommend you contact us via telephone at +27 (0) 82 887 8322 or electronic mail at info@firstrivercapital.co.za

HOW WE COLLECT INFORMATION

We may collect information about you as follows:

- (a) From you, including when you apply for our services, submit forms, requests or transactions, use our web sites or otherwise make use of our services;
- (b) From public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) From our business partners and the persons employed by us to provide services for us, which may include debt collection services, communications services and data hosting, processing and management services;
- (d) From persons employed by you to provide services to you, including your bank, internet service provider and mobile cellular service provider; and
- (e) From such other persons as you may consent to or which may be legally entitled to provide us with information about you.

We may also make enquiries with anyone for the purposes of verifying the accuracy of information already given to us.

INFORMATION WE MAY HOLD

We may record and hold the following types of information about you:

- (a) All information of the type as contained in your service or product application forms or contracts as well as any other details about you that you may provide to us subsequently, including your name, contact details, age, identity number, assets, liabilities, income and payment records;
- (b) Information we used to process your application for services and to assess your status from time to time, including as received pursuant to our enquiries with public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) Details of your preferences regarding our products and services, and other demographic and lifestyle information;
- (d) Details of the accounts you and the members of your family hold and services you and the members of your family use and have previously held and used with or through us; and
- (e) Details of your transactions pertaining to such accounts and services; and
- (f) Details of when you contact us and when we contact you, including the IP addresses, electronic mail addresses and telephone numbers you contact us from and the content of the communications between us, which we may record.

We may hold your information collected hereunder for as long as you make use of our services and for at least five years thereafter or such longer period as may be required or permitted by law.

WHY WE NEED YOUR INFORMATION

We collect and will process your information for the following purposes:

- (a) To process your application for our services and making related decisions, including by verifying your identity, status, contact details, financial track record and otherwise ascertaining that you qualify for our services from time to time;
- (b) To take such actions as may be required to enable and improve your participation in our services and to exercise our rights and comply with our obligations in respect thereof, including by processing and recording your product and service requests and transactions, managing your accounts, communicating with you regarding your use of our products and services and collecting payments you may owe us;
- (c) To ensure that the information we receive and hold about you is accurate, complete and up to date;
- (d) To prevent, investigate and prosecute fraud, money laundering, terrorism, abuse of our services and other unlawful activities;
- (e) To comply with legal and regulatory requirements, for audit purposes and legal proceedings;
- (f) To conduct market research and business analysis, understand your preferences, learn more about the products and services that you are interested in and improve the products and services we offer;
- (g) to inform and provide you with the opportunity to make use of products, services and benefits that we offer and that we believe may be of interest to you to the extent that we are lawfully permitted to do so; and
- (h) For such other purposes as you may consent to or as may otherwise be lawfully permitted, including for the purposes of protecting our and/or your legitimate interests and/or that of our suppliers and other customers.

Please note that we will not contact you telephonically for unsolicited marketing purposes or send unsolicited marketing communications to you by mail, facsimile, SMS or electronic mail if you have objected to receiving such communications by way of a public register recognised for such purposes by law or by notifying us of your objection in the prescribed manner. We will provide you with reasonable opportunities to object to receiving marketing communications in the manner prescribed by law, including upon your application to subscribe to our services and on each occasion when we send you such communications.

SHARING YOUR INFORMATION

Keeping your personal information secure is one of our most important responsibilities. We cannot disclose your information unless legally permitted thereto. Save as set out below, we will not transfer your personal information to a third party without your consent unless legally obliged thereto. You agree that we may transfer your information to the following people and organisations in pursuit of the processing purposes set out in this policy:

- (a) To the entities in our company group, including to the directors, employees, contractors, agents, auditors, legal and other professional advisors of such entities;
- (b) To any other person that supplies, supports or underwrites a service or product we provide to you insofar as it pertains to your subscription to and use of such service or product;
- (c) To any person that supports or authorises your participation in a service we provide insofar as it pertains to your registration for and participation in such service, including your bank or legal guardian where appropriate;
- (d) To credit bureaus, fraud prevention agencies and governmental, judicial, regulatory and law enforcement bodies and agencies, including the South African Police Service;
- (e) To persons employed by us to provide services on our behalf that adhere to principles similar to ours regarding the treatment of your information, including data hosting, processing and management services;
- (f) To any person to whom we cede, delegate, transfer or assign any of our rights or obligations pertaining to the services provided by us or contracts concluded by us;
- (g) To any person that acts as your executor of your estate, curator or in a similar capacity;
- (h) To such other persons as may be permitted by applicable law or that you may consent to.

Please note that our sharing of your information may also involve the transfer thereof to third parties outside South Africa. In the event of such transfer, we will require that such third party also subscribes to protecting your information on principles similar to the principles of this policy.

SECURITY

We will strive at all times to ensure that your records will always be protected against unauthorised or accidental access, processing or loss. We maintain this commitment to data security by implementing appropriate reasonable technical and organisational measures to safeguard and secure your information, including by using appropriate access control mechanisms. If we use a third party to host, manage or process your data on our behalf we will require that such third party also commit to implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we are not prevented by a law enforcement or regulatory agency, we will notify you as soon as practicably possible in writing and at your registered postal or email address if we believe that unauthorised access to your information may have occurred, providing you with such information as you may reasonably require to implement protective measures.

WEB SITES

When you visit our site we may collect certain information about your usage preferences and history. Such information will be stored in a cookie on your computer's hard drive by your web browser. Cookies are intended to assist and improve your use of our web sites. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use all of the features of our site.

Every time you connect to our web sites we store web server logs which show your IP address (the unique number which your machine uses when it is connected to the Internet); what you looked at; whether the page request was successful or not, and which browser you used to view the pages. The use of this data is strictly for statistical and personalisation purposes only. This helps us understand which areas of the site are of particular interest and also which pages are not being requested. It also tells us how many hits and page requests we get.

YOUR RIGHTS REGARDING YOUR INFORMATION

Provided that you give us suitable and adequate proof of your identity, you have a right to know which records we hold about you. This can be done by submitting a written request to us. We will not be obliged to provide you with information to the extent that we are prohibited or permitted thereto by applicable law.

You also have the right to require us to correct or erase any records we hold about you that we are no longer permitted to retain, is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained. This can be done by submitting a written request to us to do so. We will notify you of the steps taken as a result of your request.

Please contact us via email at info@firstrivercapital.co.za if you want to submit any request to us hereunder.

OBJECTIONS

Please email us at info@firstrivercapital.co.za if you want to object to our collection, processing, recording, protection, use or sharing of your information. Please note that we may require a reasonable period to comply with your objection and can only do so if permitted thereto by law and such compliance does not unreasonably prejudice our legitimate interests or that of a third party.