IMBUYISO CONSULTING & COLLECTIONS (PTY) LTD ("Imbuyiso"): PROTECTION OF PERSONAL INFORMATION ACT: DOCUMENT POPI (3): REGULATION 4 (1) (d): MANUAL

1.Background:

Imbuyiso is a registered Debt Collection Company that commenced operations in 2006. The core business is debt collection for the Financial Services Industry.

This Manual is available on our website and in hard-copy at our Head-Office at 832 Justice Mahomed Street, Muckleneuk, Pretoria and at our Branch office at 386 Pretoria Road, Silverton, Pretoria.

Chris Pierneef (Telephone number 012 4607474)/e-mail address: chrisp@imbuyiso.co.za) is the registered Information Officer for Imbuyiso.

- 2.**Purpose of Collection** (Reg 4 (1) (d) (1) Due to the nature of the business of Imbuyiso and in line with performing the task of debt collection Imbuyiso must process, update, collect, retain, safeguard and destroy (subject to legal obligations) personal information of data subjects.
- 3. Description of Data Subjects categories and the information or categories of information (Reg 4 (1) (d) (2)

The description of data subjects are debtors that owe Financial Institutions monies based on contracts.

The information processed, updated, collected, retained and destroyed is inter alia:

Account Numbers/Account Balances/Arrear
Amounts/Account History/Account type/Names/Identity
Numbers/Addresses/Telephone numbers/e-mail
addresses/Contact Details/Employer/Debt Collection actions
taken/e-mails forwarded/letters forwarded/sms-s & whatsup messages forwarded/Collection History/Promises to
Pay/Arrangements made & broken/Voice Recordings/Debit
Order particulars/History of the Account and other Debt
Collecting related information.

- 4. Recipients or Categories of recipients to whom the personal information may be supplied (Reg 4 (1) (d) (3)
- 1. The specific Financial Institution that instructed Imbuyiso on the specific matter to update their records.
- 2.The National Credit Regulator (National Credit Act), the Information Regulator (Popia) and other Regulatory Entities subject to the conditions of the various Acts governing it.
- 3.In terms of a legally obtained compelling Court Order.
- 4. With the consent of the data subject.
- 5. Planned trans -border flows of personal information (Reg 4 (1) (d) (4)

None. The only exception will be if the data subject is outside South Africa and contact is made with the data subject. The personal information will be obtained outside South Africa but processed, stored and destroyed within South Africa.

6.**Suitabilty of information security measures** (Reg 4 (1) (d) (5)

The Information held is encrypted, protected by a firewall and anti-virus and only accessible by the permanently appointed and authorized Imbuyiso Director, Manager or Staff member.

SIGNED AND DONE AT PRETORIA THIS 15^{TH} DAY OF JUNE 2021

CJ Pierneef (Information Officer) Registration number 4016/2021/- 2022/IRRTT (signed)

Evelyn Tsagae (Managing Director) (signed)