

1. Definitions and Interpretation

In this Privacy Policy, the following words bear the following meanings:

- 1.1. “consent” means any voluntary, specific and informed expression of will in terms of which permission is given by or on behalf of you of the website for the processing of the Information;
- 1.2 “Genfin” means Genfin Trading (Pty) Ltd, registration number is 2016/212828/07
- 1.3 “Information” means any personal and commercial information or information relating to you, including but not limited to:
 - contact information such as name, business name, email address, mailing address, registration number, and phone number;
 - financial information such as bank statements, credit card statements, personal and business credit history, payment behavior, bank account information, and tax ID number;
 - IP address;
 - business information including company size, and business type;
 - correspondence sent by you which is of a private or confidential nature;
 - the views or opinions of others about you
- 1.4 “Genfin website” means the website or any part thereof which is accessible from <https://genfin.co.za>;
- 1.5 “users/s / you / your / or yourself” means any person accessing any part of this website
- 1.6 “Privacy Policy” means the privacy policy of Genfin contained in this document.

2. Introduction

Genfin respects your privacy and is committed to protecting it. This Privacy Policy is intended to inform you of our Privacy Policy and of the choices you can make about the way your personal information is collected online and how the Information is utilized by us.

Certain pages on the Genfin website have been structured so that you can access the Genfin website without identifying yourself or revealing any personal information. However, should you wish to make full use of the Genfin website you may be required to provide us with personal information and accordingly we have made this notice readily available on the Genfin website.

By accessing and using the Genfin website and/or by interacting with Genfin in any capacity whatsoever, you consent to the processing of the Information on the basis set out below. If you do not consent you should stop accessing and/or using the Genfin website. This consent will apply in relation to each interaction between yourself and Genfin.

3. Applicability

This Privacy Policy applies to the Genfin website only. This statement is not applicable to other related websites not specifically included.

The Genfin website may contain links to or from other sites ("Linked Sites"), including sites maintained by Genfin but which are not governed by this Privacy Policy. Accordingly, Genfin is in no way responsible for the content or the privacy and security policies employed by Linked Sites.

Certain services are linked with those Linked Sites, some which offer you the option to share with both Genfin and the third party personal data you provide. However, Genfin will not share the Information with those Linked Sites unless you make that choice.

4. Types of information collected

When you register on the Genfin website we need to collect, use, process and in some instances, share the Information in order to provide you with the services, products or finance you have applied for. The Information may include, but is not limited to:

- contact information;
- financial information;
- IP address;
- business information; and
- any other information that may be provided by you to Genfin or obtained by Genfin or required by Genfin in relation to the provision of the services of Genfin to you.

Once you choose to register with Genfin and provide us with the Information, it will be used for the purposes of providing you with the requested service, products or finance if your application is successful. Genfin will comply with all laws, contracts or regulations when it processes the Information. We respect your privacy and undertake not to sell, rent or lease the Information to others.

5. Use of cookies

Certain non-personal information may be collected while you are using the Genfin website. This will comprise of data about usage and service operation that is not associated with a specific personal identity. Genfin may collect and use this non-personal information to evaluate how the Genfin website is being used.

Most non-personal data may be collected via cookies or other analysis technologies. The Genfin website pages normally use cookies for data analysis and potential personalization of the website and services offered.

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our systems to recognize your browser and to provide features that recognize your account as logged on and other website features. Further, to help us tailor the website to the needs and interests of our users, or for other purposes, we may gather aggregate, permanently non-personally identifiable information via cookies. Examples include the type of internet browser our users are using, the frequency of visits to our site and which pages our users viewed. We may share these aggregate statistics with others. The use of cookies is standard on the internet and many major web sites use them.

Technologies may vary, but in many cases, may involve a small file stored locally on the computer used to access the Genfin website, and may be used to store and collect information relating to your viewing and use of the Genfin website. Information collected through cookies is used to create a profile of our users. A profile

is stored information we keep on individual users that details their preferences, their use and request history and behavioral activity, and can minimize the need for you to re-enter information.

Most cookies expire after a defined period, or you can delete your cookie file at any time. Most web browser software is initially set up to accept cookies. You can reset your web browser software to refuse cookies or to indicate when a cookie is being sent. However, some parts of the Genfin website will not function properly or may be considerably slower if you refuse cookies. For example, without cookies, you will not be able to set personalized preferences, and/or may have difficulty completing transactions.

Genfin may collect your computer's IP ("Internet Protocol") address and domain name address, the identity of your internet service or access provider, the type of web browsing software you use, your computers operating system, the URL of the web page from which you came to visit the Genfin website and the language you selected for your web browsing software (collectively referred to herein as clickstream data). We use these technologies to identify our users, to help diagnose problems with our server, and to administer the Genfin website and the services offered thereon.

6. How Genfin collects the information?

We may collect the Information in several ways, including:

- directly from you (such as where you provide information to us when you complete an application form or agreement for one of our services, or contact us with a query or request);
- from third parties, such as our related entities, financial institutions;
- business or commercial partners and credit agencies;
- from publicly available sources of information; and
- from our records of how you use your products or services.

7. How Genfin will use the Information?

Genfin needs and uses the Information to provide you with the services you request and to help us better understand your needs and interests in the future. Specifically, Genfin uses the Information to help you complete and provide the services you have requested.

We may use the Information for the following purposes:

- to verify your identity;
- to conduct appropriate checks for credit-worthiness and for fraud;
- to register you as a user;
- to process your application and determine whether your business qualifies for one of our loan products;
- to process, administer and manage the products, services and finance we provide to you and to collect any amounts you may owe us;
- to perform any obligations under a contract with you;
- to provide products and services to you, to provide you with information about those products and services, to assist you with enquiries or purchases, to enhance your experience of our products and services, and to provide you with better customer service
- to communicate with you to send order confirmations, respond to customer service requests, send marketing communications, and send account update notifications;
- to conduct research and analyses to better understand our customers;
- to gain an understanding of the Information and communication needs, to improve or develop our products and services, or to perform research and analysis; and

- to monitor network use, quality and performance, and to operate, maintain, develop, test and upgrade our systems and infrastructure.

If you refuse to supply the Information, certain consequences may naturally flow from such refusal, such as preventing Genfin from concluding or performing any contracts with you.

8. How Genfin will share the Information and with whom?

Genfin will not share the Information with third parties except in responding to your requests for products, services or finance.

This may include the processing of the Information for credit reporting purposes. For this purpose, you hereby consent to Genfin requesting and obtaining credit information pertaining to you from a credit agency for concluding any transaction offered by Genfin through the Genfin website.

Genfin may partner with other organizations who may provide you with the services requested through the Genfin website. These partner organizations are required to keep the Information confidential received on behalf of Genfin and may not use it for any purpose other than to carry out the services they are performing for Genfin.

We may disclose the Information to third parties who provide services to us, including organizations and contractors that assist us with the purposes for which we use the Information. These services include:

- customer enquiries and support services;
- mailing operations, billing and debt-recovery functions;
- information technology and network services;
- market research and marketing;
- credit related (credit-worthiness, credit rating, default listing etc.);
- credit providers; and
- fraud checking agencies.

9. How we use the Information for direct marketing

We may also use the Information so that we can promote and market products, services and special offers that we think will be of interest to you. This marketing may be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customizing on-line content and displaying advertising on websites) and may continue after you cease acquiring any products services or finance from us until you opt-out. You may opt out by calling us on 087 135 3150.

10. Data access, accuracy, amendments, retention and opting out

Genfin will try to keep the Information accurate. We will provide you with access to the Information. To protect your privacy and security, when doing so, we will also take reasonable steps to verify your identity.

Upon request, Genfin will:

- correct the Information that you state is incorrect; or
- permit you to “opt out” of further contact (excepting notification of major changes to the service), either on the original site of registration or at any time subsequently, while still allowing basic access to the site;
- remove you and the Information provided electronically from our database, thereby cancelling your registration.

To request a correction or cancellation, send an e-mail to clientcare@genfin.co.za.

11. Security

Genfin undertakes to take all reasonable measures to protect the Information you provide us. These measures include, but are not limited to preventing unauthorised access or disclosure, maintaining data accuracy, and ensuring the appropriate use of the Information. Genfin has in place reasonable physical and managerial procedures to safeguard the Information we collect.

As the internet is not a secure medium of communication, Genfin cannot guarantee the security of any of the Information you input on the Genfin website or send to Genfin via the internet. Genfin is not, and will not be, responsible for any damages you or others may suffer because of the loss of confidentiality of any of the Information.

If the Information about you is inadvertently leaked or Genfin’s security has been unlawfully breached by any unauthorized party, Genfin shall immediately identify the relevant users who may be affected by the security breach, and shall contact them at their last known email address or contact details or by the quickest means possible.

Genfin shall provide sufficient information to you to allow you to take the necessary protective measures against the potential consequences of the compromise, or shall advise you of the steps to be taken by you and the possible consequences that may ensue from the breach for you.

12. Changes to this statement

Genfin may amend the provisions of this Privacy Policy to comply with any changes in the law, and/or pursuant to any changes to its information processing activities or privacy practices. Such amendments will be published on the Genfin website and will become operable from the date of such publication.

Please note that these guidelines are subject to change at any time. Any such changes will be posted on this page. You are encouraged to review this Privacy Policy at the inception of each session.

13. Law and jurisdiction

This Privacy Policy is governed by the laws of the Republic of South Africa and without regard to the conflict of laws principle. You agree that any cause of action that may arise under this Privacy Policy shall be commenced and be heard in the appropriate court in South Africa. You agree to submit to the personal and exclusive jurisdiction of the courts located within South Africa.

14. Acceptance of policy

By using the Genfin website, or otherwise providing your information to Genfin, you signify your acceptance of our Privacy Policy. If you do not agree to this policy, please do not use the Genfin website or provide any information to Genfin.