

Privacy Policy

iFundi Customer Solutions Pty Ltd trading as iFundi

iFundi Customer Solutions Pty Ltd and its related entities (referred to as iFundi) are committed to the protection of your Personal Information in accordance with the South African Privacy Principles as set out in the Protection of Personal Information Act, 2013 (Act 4 of 2013).

This Privacy Policy describes the manner in which iFundi collects, holds and uses Personal Information that is covered by the POPI Act. It is not intended to cover categories of Personal Information that are not covered by the POPI Act. If you wish to make any inquiries regarding this Privacy Policy, you should contact iFundi in any of the ways specified in clause 14.

iFundi may, from time to time, review and update this Privacy Policy including to take into account new laws, regulations and technology. All Personal Information held by iFundi will be governed by our most recent Privacy Policy, posted on our website ifundi.co.za (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information.

1. What information is covered by the POPI Act?

"Personal Information" is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not. **"Sensitive Information"** is Personal Information about an individual that includes health information, genetic information, biometric information or templates, or Personal Information that is also information or an opinion about an individual's race or ethnicity, their religious, political or philosophical beliefs, opinions or affiliations, their sexual orientation or criminal record.

2. What information do we collect and hold?

iFundi may collect and hold Personal Information about you such as your name, gender, date of birth, contact details (including your address, phone number and email address, whether personal or for work), level of education, financial information, billing or payment details, bank account details, tax file number, products and services information and preferences. iFundi does not collect Sensitive Information and we will only collect such information with your consent if it is reasonably necessary for one or more of our functions or activities.

3. Why do we collect Personal Information?

1. iFundi collects Personal Information from customers, employees, contractors and other individuals that is reasonably necessary for one or more of our functions or activities, including: in order to allow us to conduct our business functions, to meet any regulatory requirements which apply to our business, to market and sell our products and services and to conduct employee related activities.

You have the option to deal with us anonymously or by using a pseudonym. However you acknowledge that where this is

impractical (for example when you contract with us) or where the law or a court order provides otherwise we are not required to provide these options to you. If you opt to deal with us anonymously or by using a pseudonym, we may not be able to provide you with requested information, products or services unless you provide us with a valid email address.

If you choose not to provide your Personal Information to iFundi, or choose to deal with us anonymously or by using a pseudonym, we may not be able to undertake certain activities for you including providing you with requested information, products or services.

When and how do we collect Personal Information?

iFundi collects Personal Information directly from you when you: visit our Website, use our online services or buy products from us, request information about us or our products or services, provide feedback, respond to a survey, change your content or email preferences, enter into an agreement or contract with us, fill in a form on our Website (including an enquiry form or a registration form to register as a user on our Website), fill in a form or request that we forward your information to a third party service or course provider, become an employee of iFundi, or contact us by telephone, facsimile, email, post or in person.

iFundi may also collect Personal Information about you via third parties including from our recruitment portal, our learning portal and other third party service providers.

iFundi may also collect de-identified Personal Information from third parties. De-identified information means that all personal identifiers such as a person's name, contact details, date of birth or other characteristics that enable identification of an individual have been removed.

In some circumstances we may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

Information collected via our Website

iFundi will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, iFundi may collect Personal

Information from users of the Website when they:

complete an online form, including an enquiry form or registering to receive updates, promotional material or other information; and/or

otherwise correspond with iFundi.

Aggregate and Click Stream Data – When you visit and browse our Website, our Website host may collect Personal Information and non- personal information or data in aggregate form for statistical, reporting and maintenance purposes. Subject to clause 7.4, the Personal Information collected by our Website host will not be used to identify you. The information may include:

the number of users visiting our Website and the number of pages viewed;

the date, time and duration of a visit;

the IP address of your computer; or

the path taken through our Website.

iFundi's Website host uses this information to administer and improve the performance of our Website, including to measure and analyse internet usage across our Website and to assist us with the diagnosis of and to provide support for any issues with our Website or services.

Cookies – Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. You can adjust your internet browser to disable cookies,

however iFundi may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

Web Beacons – Web beacons are images that originate from a third party site to track visitor activities. iFundi may use web beacons to collect aggregate data and provides this information to our Website host to administer and improve the performance of our Website.

Advertising – We use Google and/or other third-party service providers to serve ads on our behalf across the Internet and sometimes on our Website. They may collect anonymous information about your visits to our Website (not including your name, address, email address or telephone number), and your interaction with our products and services. They may also use information about your visits to the Website and other websites to target advertisements for goods and services in order to provide more relevant advertisements about goods and services of interest to you.

By using this website you accept that third party cookies may be placed on your web browser or similar technology may be used where cookies are not supported in order for us to serve related advertising in future

How iFundi uses the Personal Information it collects about you

iFundi uses the Personal Information it collects about you for our business functions and activities, which may include the following:

to provide you with information, products or services you have

requested, including providing you with information about options available, and where we engage with third parties to provide you with goods or services;

to respond to your enquiries or to register you as a registered user of the Website;

to promote and market our products and services to you, including to communicate with you via our email newsletters;

to personalise and customise your experiences on our Website;

to help iFundi research the needs of its customers;

to conduct research for the purposes of improving existing products or services or creating new products or services;

to operate and improve our Website, including displaying personalised content and advertising;

to provide you with ongoing information about iFundi and its activities;

to allow us to provide you with third party information and offers in which we believe you may be interested;

to allow us to provide your Personal Information to third parties when you have consented to us doing so;

to use de-identified information for the purposes of data analysis, research and reporting;

to comply with regulatory or other legal requirements;

for purposes related to the employment of our personnel and providing internal services to our staff; and

for any other use required or permitted by law or any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

for any other use required or permitted by law or any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

iFundi may use your Personal Information for a secondary purpose if that secondary purpose is related to those purposes in clause 6.1, if we have your consent or if otherwise provided for under the Privacy Act.

Direct Marketing – iFundi may use your Personal Information to provide you with direct marketing materials if you would reasonably expect us to or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing material may include promotional material about iFundi or the products or services offered by iFundi.

You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 14.

Generally, we will only collect and use your Personal Information in accordance with this Privacy Policy. In the event that we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

Who do we disclose your Personal Information to?

Depending on the nature of your relationship with iFundi, we may disclose your Personal

Information to shareholders, officers and employees of iFundi, other businesses within our group of companies, service providers who assist us in our business operations (including parties that we engage to provide you with goods or services on our behalf or who are connected with or involved in our relationship with you), parties involved in the purchase or sale of any of our businesses, other third parties, or otherwise as required by law.

iFundi may also disclose your Personal Information to our Website host or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes or for the purpose of improving our services.

Unless otherwise specified in this Privacy Policy, iFundi or iFundi's Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law, is otherwise permitted by the Privacy Act, or is with your consent.

Disclosure of your Personal Information overseas

iFundi does not currently disclose Personal Information outside of South Africa.

Employee Records

Employee records are not generally subject to the Privacy Act. As such this Privacy Policy may not apply to the handling of employee related information. Please contact

us directly for information about our employee information handling practices.

Storage and security of Personal Information held by iFundi

iFundi will take reasonable steps to protect your Personal Information from misuse, interference and loss and from unauthorised access, modification or disclosure.

iFundi aims to keep your Personal Information secure and up to date. We will comply with our obligations under the POPI Act in relation to any Personal Information that we handle, including information which is held on iFundi's computer systems.

Personal Information that is held by iFundi in hard copy is stored securely on its premises and is only disclosed or used for the purposes described in this Privacy Policy.

Updating and correcting your Personal Information

We will take reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete. You can update your Personal Information at any time by

contacting iFundi in any of the ways specified in clause 14 or if you are a registered iFundi user, by logging in and updating your profile. iFundi welcomes any changes to your Personal Information so as to keep our records up to date.

How long will iFundi keep your Personal Information?

We will keep your Personal Information only for as long as required for our business purposes and otherwise as required by South African law.

Where we no longer need to keep your Personal Information in accordance with clause 12.1, we will take reasonable steps to destroy or de-identify your Personal Information.

If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons, or as otherwise required by law).

Finding out what Personal Information iFundi holds about you

You are entitled to access Personal Information that iFundi holds about you. If you request access to your Personal Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If we refuse your request to access your Personal Information, we will provide you with written reasons for the refusal.

A request for access can be made by contacting iFundi in any of the ways specified in clause 14.

How to contact us and more information

If you feel that your privacy has not been respected or that iFundi has conducted itself inconsistently with this Privacy Policy, or the POPI Act in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

Email: privacy@ifundi.co.za

Write To:

Att: Privacy Officer

iFundi Customer Solutions Pty Ltd, PO Box 785932 Sandton 2146

You can find out more information about the POPI Act from the Office of the Information Regulator. The Information Chairperson may be contacted

at <https://www.justice.gov.za/inforeg/index.html> (email – inforeg@justice.gov.za).

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