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Hyphen Technology (Pty) Limited

# Client Privacy Notice

Version 1.0

# Table of contents

- 1. DEFINITIONS** 4
- 2. BACKGROUND AND PURPOSE OF THIS NOTICE** 4
- 3. CLIENTS’ RIGHT TO RAISE QUERIES OR COMPLAINTS** 5
- 4. WHAT IS PERSONAL INFORMATION?** 5
- 5. WHEN WILL HYPHEN PROCESS CLIENTS’ PERSONAL INFORMATION?** 6
- 6. WHEN WILL HYPHEN PROCESS CLIENTS’ SPECIAL PERSONAL INFORMATION?** 6
- 7. WHEN AND HOW WILL HYPHEN PROCESS THE PERSONAL INFORMATION OF CHILDREN?** 6
- 8. WHEN, AND FROM WHERE, DOES HYPHEN OBTAIN PERSONAL INFORMATION ABOUT CLIENTS?** 7
- 9. REASONS HYPHEN NEEDS TO PROCESS CLIENTS’ PERSONAL INFORMATION** 8
  - 9.1 Contract 8
  - 9.2 Law 8
  - 9.3 Legitimate interest 9
- 10.WHY DOES HYPHEN FURTHER USE OR PROCESS CLIENTS’ PERSONAL INFORMATION?** 10
- 11.CENTRALISED PROCESSING** 10
- 12.HOW HYPHEN USES CLIENTS’ PERSONAL INFORMATION FOR MARKETING?** 11
- 13.WHEN WILL HYPHEN USE CLIENTS’ PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS ABOUT THEM?** 11
- 14.WHEN, HOW, AND WITH WHOM DOES HYPHEN SHARE CLIENTS’ PERSONAL INFORMATION?** 11
- 15.WHEN AND HOW HYPHEN OBTAINS AND SHARES CLIENTS’ PERSONAL INFORMATION FROM/WITH CREDIT BUREAUX?** 12
- 16.UNDER WHAT CIRCUMSTANCES WILL HYPHEN TRANSFER CLIENTS’ PERSONAL INFORMATION TO OTHER COUNTRIES?** 12
- 17.CLIENTS’ DUTIES AND RIGHTS REGARDING THE PERSONAL INFORMATION WHICH HYPHEN HAS ABOUT THEM** 13
  - 17.1 Right to access 13
  - 17.2 Right to correction, deletion or destruction 14
  - 17.3 Right to objection 14
  - 17.4 Right to withdraw consent 14
  - 17.5 Right to complain 15
- 18.HOW HYPHEN SECURES CLIENTS’ PERSONAL INFORMATION** 15
- 19.HOW LONG DOES HYPHEN KEEP CLIENTS’ PERSONAL INFORMATION?** 15
- 20.COOKIES** 16
- 21.HOW HYPHEN PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON** 16
- 22.ANNEXURES:** 17
  - 22.1 FORM 2 17
  - 22.2 FORM 1: 17

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## 1. DEFINITIONS

1. Hyphen Technology (Pty) Ltd is referred to as Hyphen in short in this document.
2. Any product, service or goods offered to a client by Hyphen is referred to as a solution in this document.

## 2. BACKGROUND AND PURPOSE OF THIS NOTICE

Protecting clients' personal information is important to Hyphen. To do so, it follows general principles in accordance with applicable privacy laws.

Hyphen has developed this client privacy notice (notice) to enable its clients to understand how Hyphen collects, uses and safeguards their personal information.

Hyphen collects personal information about its clients. This includes what clients tell Hyphen about themselves, what Hyphen learns by having a client or when a client makes use of a solution, as well as the choices clients make about the marketing they elect to receive. This notice also outlines clients' privacy rights and how the law protects clients.

In terms of applicable privacy laws, this notice may also apply on behalf of other third parties (such as authorised agents and contractors), acting on Hyphen's behalf when providing clients with solutions. If Hyphen processes personal information for another party under a contract or a mandate, however, the Hyphen's privacy notice (this document) will apply.

In this notice "process" means how Hyphen collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with clients' personal information. As a general rule, Hyphen will only process clients' personal information if this is required to deliver or offer a solution to a client. Hyphen respects clients' privacy and will treat their personal information confidentially.

Hyphen may combine clients' personal information and use the combined personal information for any of the purposes stated in this notice.

**VERY IMPORTANT:** If clients use Hyphen solutions and service channels (including both assisted and unassisted interactions), or by accepting any agreement, contract, mandate or annexure with Hyphen or by utilising any solutions offered by the Hyphen, clients agree that in order to:

- conclude and fulfil contractual terms or obligations to a client;
- comply with obligations imposed by law; or
- to protect or pursue clients', Hyphen's, or a third party's legitimate interests, including offering solutions that best meet clients' needs;

clients' personal information may be processed through centralised functions and systems across Hyphen and may be used for the purposes, in the manner, and with the appropriate controls as set out in this notice.

Where it is necessary to obtain consent for processing, Hyphen will seek clients' consent separately. Clients should read the consent request carefully as it may limit their rights.

**NOTE:** As Hyphen has operations in a number of countries, this notice will apply to the processing of personal information by Hyphen in any country and the processing of clients' personal information may be conducted outside the borders of South Africa, but will be processed according to the requirements and safeguards of applicable privacy law or privacy rules.

Hyphen may change this notice from time to time if required by law or its business practices. Where the change is material, Hyphen will notify clients and will allow a reasonable period for clients to raise any objections before the change is made. Please note that Hyphen may not be able to continue a relationship with a client or provide clients with certain solutions if they do not agree to the changes.

The latest version of the notice displayed on Hyphen's website will apply to clients' interactions with Hyphen and is available at: <https://www.hyphen.co.za/>.

### 3. CLIENTS' RIGHT TO RAISE QUERIES OR COMPLAINTS

Hyphen is a responsible party and as an operator in terms of the Personal Information Act (PoPIA) No. 4 of 2013. Hyphen has an obligation to meet the 8 lawful conditions as stipulated within the Act. Clients can contact the Hyphen Privacy Office with any queries or complaints at [privacy@hyphen.co.za](mailto:privacy@hyphen.co.za).

### 4. WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies a client or specifically relates to a client. Personal information includes, but is not limited to, the following information about a client:

- marital status (married, single, divorced); national origin; age; language; birth; education;
- financial history (e.g. income, expenses, obligations, assets and liabilities or buying, investing, lending, insurance, banking and money management behaviour or goals and needs based on, amongst others, account transactions);
- employment history and current employment status (for example when a client applies for credit);
- gender or sex (for statistical purposes as required by the law);
- identifying number (e.g. an account number, identity number or passport number);
- email address; physical address (e.g. residential address, work address or physical location); telephone number;
- information about a client's location (e.g. geolocation or GPS location);
- online identifiers; social media profiles;
- biometric information (e.g. fingerprints, signature or voice);
- race (for statistical purposes as required by the law);
- physical health; mental health; wellbeing; disability; religion; belief; conscience; culture;
- medical history (e.g. HIV/AIDS status); criminal history; employment history;
- personal views, preferences and opinions;
- confidential correspondence; or
- another's views or opinions about a client and a client's name also constitute personal information.

Depending on the applicable law of the country, a juristic entity (like a company) may also have personal information which is protectable in law and which may be processed in terms of this notice.

There is also a category of personal information called special personal information, which includes the following personal information about a client:

- religious and philosophical beliefs (for example where a client enters a competition and is requested to express a philosophical view);
- race (e.g. where a client applies for a solution where the statistical information must be recorded);
- ethnic origin;

- trade union membership;
- political beliefs;
- health including physical or mental health, disability and medical history (e.g. where a client applies for an insurance policy);
- biometric information (e.g. to verify a client's identity); or
- criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

## 5. WHEN WILL HYPHEN PROCESS CLIENTS' PERSONAL INFORMATION?

Hyphen may process clients' personal information for lawful purposes relating to its business if the following circumstances apply:

- it is necessary to conclude or perform under a contract Hyphen has with the client or to provide the solution to the client;
- the law requires or permits it;
- it is required to protect or pursue the client's, Hyphen's or a third party's legitimate interest;
- the client has consented thereto;
- a person legally authorised by the client, the law or a court, has consented thereto; or
- the client is a child and a competent person (such as a parent or guardian) has consented thereto on their behalf.

## 6. WHEN WILL HYPHEN PROCESS CLIENTS' SPECIAL PERSONAL INFORMATION?

Hyphen may process clients' special personal information in the following circumstances, among others:

- if the processing is needed to create, use or protect a right or obligation in law;
- if the processing is for statistical or research purposes, and all legal conditions are met;
- if the special personal information was made public by the client;
- if the processing is required by law;
- if the client has consented to the processing.

## 7. WHEN AND HOW WILL HYPHEN PROCESS THE PERSONAL INFORMATION OF CHILDREN?

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts.

Hyphen processes the personal information of children if the law permits this.

Hyphen may process the personal information of children if any one or more of the following applies:

- where the child is legally old enough to sign a document as a witness without assistance from their parent or guardian;
- a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child;
- the child's personal information was made public by the child, with the consent of a person who can sign legal agreements;
- where Hyphen is acting as an operator in terms of a contract or mandate to process on behalf of a client; or

- the processing is for statistical or research purposes and all legal conditions are met

## 8. WHEN, AND FROM WHERE, DOES HYPHEN OBTAIN PERSONAL INFORMATION ABOUT CLIENTS?

Hyphen collects information about clients:

- directly from clients;
- based on clients' use of group solutions or service channels (such as Hyphen website, applications, including both assisted and unassisted client interactions) as applicable;
- based on how clients engage or interact with Hyphen, such as on social media, and through emails, letters, telephone calls and surveys;
- based on a client's relationship with Hyphen;
- from public sources (such as newspapers, company registers, online search engines, deed registries, public posts on social media);
- from technology, such as a client's access and use including both assisted and unassisted interactions (e.g. on Hyphen's websites and mobile applications);
- clients' engagement with Hyphen advertising, marketing and public messaging; and
- from third parties that Hyphen interacts with for the purposes of conducting its business (such as partners, list providers, credit bureaux, regulators and government departments or service providers).

Hyphen collects and processes clients' personal information at the start of, and for the duration of their relationship with Hyphen. Hyphen may also process clients' personal information when their relationship with Hyphen has ended.

If the law requires Hyphen to do so, it will ask for client consent before collecting personal information about them from third parties.

The third parties (which may include parties Hyphen engages with as independent responsible parties, joint responsible parties or operators) from whom Hyphen may collect clients' personal information include, but are not limited to, the following:

- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks and other persons that assist with the processing of clients' payment instructions, such as card scheme providers (including Visa or Mastercard);
- law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsmen, government departments, and local and international tax authorities;
- credit bureaux;
- trustees, executors or curators appointed by a court of law;
- Hyphen's service providers, agents and subcontractors, such as couriers and other persons Hyphen uses to offer and provide solutions to clients;
- courts of law or tribunals;
- marketing list providers;
- social media platforms; or
- online search engine providers.

## 9. REASONS HYPHEN NEEDS TO PROCESS CLIENTS' PERSONAL INFORMATION

Hyphen may process clients' personal information for the reasons outlined below.

### 9.1 Contract

Hyphen may process clients' personal information if it is necessary to conclude or perform under a contract Hyphen has with a client or to provide a solution to a client. This includes:

- assessing and processing applications for solutions;
- providing a client with solutions they have requested;
- opening, managing and maintaining client profiles or relationships with Hyphen;
- enabling Hyphen to deliver goods, documents or notices to clients;
- communicating with clients and carry out client instructions and requests;
- responding to client enquiries and complaints;
- enforcing and collecting on any agreement when a client is in default or breach of the terms and conditions of the agreement, such as tracing a client or to institute legal proceedings against a client. In such scenario Hyphen may aggregate the contact details provided to determine the client's most accurate contact details in order to enforce or collect on any agreement the client has with Hyphen;
- disclosing and obtaining personal information from credit bureaux regarding a client's credit history;
- meeting record-keeping obligations;
- conducting market and behavioural research, including scoring and analysis to determine if a client qualifies for solutions, or to determine a client's credit or insurance risk;
- enabling clients to participate in and make use of value-added solutions;
- client satisfaction surveys, promotional and other competitions;
- processing or considering or assessing insurance or assurance claims;
- security and identity verification, and checking the accuracy of client personal information; or
- any other related purposes.

### 9.2 Law

Hyphen may process clients' personal information if the law requires or permits it. This includes:

- complying with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules);
- complying with voluntary and involuntary codes of conduct and industry agreements;
- fulfilling reporting requirements and information requests;
- processing payment instructions (such as a debit order);
- meeting record-keeping obligations;
- detecting, preventing and reporting theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information provided to Hyphen, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws;
- conducting market and behavioural research, including scoring and analysis to determine if a client qualifies for solutions, or to determine a client's credit or insurance risk;
- enabling clients to participate in and make use of value-added solutions;
- client satisfaction surveys, promotional and other competitions;
- disclosing and obtaining personal information from credit bureaux regarding a client's credit history;



- processing or considering or assessing insurance or assurance claims; or
- any other related purposes.

### 9.3 Legitimate interest

Hyphen may process clients' personal information in the daily management of its business and finances and to protect Hyphen's clients, employees, service providers and assets. It is to Hyphen's benefit to ensure that its procedures, policies and systems operate efficiently and effectively.

Hyphen may process clients' personal information to provide them with the most appropriate solutions and to develop and improve solutions and Hyphen's business.

Hyphen may process a client's personal information if it is required to protect or pursue their, Hyphen's or a third party's legitimate interest. This includes:

- developing, implementing, monitoring and improving Hyphen's business processes, policies and systems;
- managing business continuity and emergencies;
- protecting and enforcing Hyphen's rights and remedies in the law;
- developing, testing and improving solutions for clients, this may include connecting client personal information with other personal information obtained from third parties or public records to better understand client needs and develop solutions that meet these needs. Hyphen may also consider client actions, behaviour, preferences, expectations, feedback and financial history;
- tailoring solutions which would include consideration of a client's use of third-party products, goods and services and marketing of appropriate solutions to the client, including marketing on Hyphen's own or other websites, mobile apps and social media;
- marketing solutions to clients via various means including on other websites and mobile apps including social media;
- responding to client enquiries and communications including the recording of engagements and analysing the quality of Hyphen's engagements with a client;
- responding to complaints including analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate;
- enforcing and collecting on any agreement when a client is in default or breach of the terms and conditions of the agreement, such as tracing the client, or to institute legal proceedings against the client. In such a scenario, Hyphen may aggregate the contact details provided to determine the client's most accurate contact details in order to enforce or collect on any agreement the client has with Hyphen;
- processing payment instructions (such as a debit order);
- meeting record-keeping obligations;
- fulfilling reporting requirements and information requests;
- complying with voluntary and involuntary codes of conduct and industry agreements;
- detecting, preventing and reporting theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information provided to Hyphen, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of Hyphen's buildings, including CCTV cameras and access control;
- conducting market and behavioural research, including scoring and analysis to determine if a client qualifies for solutions, or determining a client's credit or insurance risk;

- statistical purposes, such as market segmentation or client segments (i.e. placing clients in groups with similar clients based on their personal information);
- client satisfaction surveys, promotional and other competitions;
- disclosing and obtaining personal information from credit bureaux regarding a client's credit history; or
- any other related purposes.

## 10. WHY DOES HYPHEN FURTHER USE OR PROCESS CLIENTS' PERSONAL INFORMATION?

At the time that Hyphen collects personal information from a client, it will have a reason or purpose to collect that personal information. In certain circumstances, however, Hyphen may use that same personal information for other purposes. Hyphen will only do this where the law allows it and where the other purposes are compatible with the original purpose/s applicable when Hyphen collected the client's personal information. Hyphen may also need to request a client's specific consent for the further processing in limited circumstances. Examples of these other purposes are included in the list of purposes set out in section 9 above.

Hyphen may also further use or process a client's personal information if:

- the personal information about the client was obtained from a public record, e.g. the deed's registry;
- the client made the personal information public, e.g. on social media;
- the personal information is used for historical, statistical or research purposes, the results will not identify the client;
- proceedings have started or are contemplated in a court or tribunal;
- it is in the interest of national security;
- if Hyphen must adhere to the law, specifically tax legislation; or
- the Information Regulator has exempted the processing.

Hyphen may also further use or process a client's personal information if the client has consented to it or, in the instance of a child, a competent person has consented to it.

Any enquiries about the further processing of client personal information can be made through the contact details of the client's solution provider, as set out in the responsible parties table in section 3 of this notice.

## 11. CENTRALISED PROCESSING

Hyphen aims to create efficiencies in the way it processes information across Hyphen. Clients' personal information may therefore be processed through centralised functions and systems, which includes the housing of their personal information in a centralised group data warehouse.

This centralised processing is structured to ensure efficient processing that benefits both the client and Hyphen. Such benefits include, but are not limited to:

- improved information management, integrity and information security;
- the leveraging of centralised crime and fraud prevention tools;
- better knowledge of a client's financial service needs so that appropriate solutions can be advertised and marketed to the client; and
- a reduction in information management costs;

Details of further interests which are promoted by the centralised processing can be found in section 9.3.

Should a client wish to exercise their privacy rights in terms of personal information provided to an entity in Hyphen or enquire about the centralised processing procedure, enquiries can be made through the contact details of the client's solution provider, as set out in the responsible parties table of this notice.

## 12. HOW HYPHEN USES CLIENTS' PERSONAL INFORMATION FOR MARKETING?

- Hyphen will use clients' personal information to market Hyphen financial solutions to them.
- Hyphen will do this in person, by post, telephone, or electronic channels such as SMS, email and fax.
- In all cases, a person can request Hyphen to stop sending marketing communications to them at any time.

## 13. WHEN WILL HYPHEN USE CLIENTS' PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS ABOUT THEM?

An automated decision is made when a client's personal information is analysed without human intervention in that decision-making process.

Hyphen may use a client's personal information to make an automated decision as allowed by the law. An example of automated decision making is where a client is subject to Hyphen's client desirability test.

Clients have the right to query any such decisions made, and Hyphen will provide reasons for the decisions as far as reasonably possible.

## 14. WHEN, HOW, AND WITH WHOM DOES HYPHEN SHARE CLIENTS' PERSONAL INFORMATION?

In general, Hyphen will only share clients' personal information if any one or more of the following apply:

- if the client has consented to this;
- if it is necessary to conclude or perform under a contract Hyphen has with the client;
- if the law requires it; or
- if it is necessary to protect or pursue the client's, Hyphen's or a third party's legitimate interest.

Where required, each member of Hyphen may share a client's personal information with the following persons, which may include parties that Hyphen engages with as independent responsible parties, joint responsible parties or operators. These persons have an obligation to keep clients' personal information secure and confidential:

- payment processing services providers, merchants, banks and other persons that assist with the processing of client payment instructions, such as card scheme providers (including Visa or Mastercard);
- Hyphen's employees, as required by their employment conditions;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;

- law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsmen, government departments, and local and international tax authorities and other persons the law requires Hyphen to share client personal information with;
- credit bureaux;
- trustees, executors or curators appointed by a court of law;
- our service providers, agents and subcontractors, such as couriers and other persons Hyphen uses to offer and provide solutions to clients;
- persons to whom Hyphen have ceded its rights or delegated its obligations to under agreements, such as where a business is sold;
- courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications; or
- the general public, where clients submit content to group social media sites such as a group business's Facebook page.

## 15. WHEN AND HOW HYPHEN OBTAINS AND SHARES CLIENTS' PERSONAL INFORMATION FROM/WITH CREDIT BUREAUX?

Hyphen may obtain clients' personal information from credit bureaux for any one or more of the following reasons:

- if the client requested Hyphen to do so, or agreed that it may do so;
- to verify a client's identity;
- to obtain or verify a client's employment details;
- to obtain, verify, or update a client's contact or address details;
- to obtain a credit report about a client, which includes their credit history and credit score, when the client applies for a credit agreement to prevent reckless lending or over-indebtedness;
- to determine a client's credit risk;
- for debt recovery;
- to trace a client's whereabouts;
- to update a client's contact details;
- to conduct research, statistical analysis or system testing;
- to determine the source(s) of a client's income;
- to build credit scorecards which are used to evaluate credit applications; or
- to determine which solutions to promote or to offer to a client.

Hyphen will share a client's personal information with the credit bureaux for, among others, any one or more of the following reasons:

- to report payment behaviour on an existing agreement; or
- to report non-compliance with an existing agreement, such as not paying in full or on time. Clients should refer to their specific agreement with Hyphen for further information.

## 16. UNDER WHAT CIRCUMSTANCES WILL HYPHEN TRANSFER CLIENTS' PERSONAL INFORMATION TO OTHER COUNTRIES?

Hyphen will only transfer a client's personal information to third parties in another country in any one or more of the following circumstances:

- where a client's personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient;

- where the transfer is necessary to enter into, or perform, under a contract with the client or a contract with a third party that is in the client's interest;
- where the client has consented to the transfer; and/or
- where it is not reasonably practical to obtain the client's consent, but the transfer is in the client's interest.

This transfer will happen within the requirements and safeguards of applicable laws or privacy rules that bind Hyphen.

Where possible, the party processing a client's personal information in another country will agree to apply the same level of protection as available by law in the client's country, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

An example of Hyphen transferring a client's personal information to another country would be when the client's personal information is stored on a client relationship management tool.

**TAKE NOTE:** As Hyphen operates in several countries, clients' personal information may be shared with companies in other countries and processed in those countries under the privacy rules that bind Hyphen.

Where Hyphen is mandated to process client's data under an agreement, Hyphen will never share, store, or process with any third-party in other countries except where the client is located outside the borders of South Africa.

## 17. CLIENTS' DUTIES AND RIGHTS REGARDING THE PERSONAL INFORMATION WHICH HYPHEN HAS ABOUT THEM

Clients must provide Hyphen with proof of identity when enforcing the rights below.

Clients must inform Hyphen when their personal information changes, as soon as possible after the change.

### 17.1 Right to access

Clients have the right to request access to the personal information Hyphen has about them by contacting Hyphen. This includes requesting:

- confirmation that Hyphen holds the client's personal information;
- a copy or description of the record containing the client's personal information; and
- the identity or categories of third parties who have had access to the client's personal information.

Hyphen will attend to requests for access to personal information within a reasonable time. Clients may be required to pay a reasonable fee to receive copies or descriptions of records, or information about, third parties. Hyphen will inform clients of the fee before attending to their request.

Clients should note that the law may limit their right to access information.

In certain instances, clients can give effect to this right by making use of Hyphen's assisted interfaces, e.g. contacting the Hyphen privacy office on the details provided under section 3.

## **17.2 Right to correction, deletion or destruction**

Clients have the right to request Hyphen to correct, delete or destroy the personal information it has about them if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if Hyphen are no longer authorised to keep it. Clients must inform Hyphen of their request in the prescribed form. Prescribed form 2 has been included as an annexure to this notice.

Hyphen will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on Hyphen's platform/systems. Hyphen may request documents from the client to verify the change in personal information.

A specific agreement that a client has entered into with Hyphen may determine how the client must change their personal information provided at the time when they entered into the specific agreement. Clients must adhere to these requirements.

If the law requires Hyphen to keep the personal information, it will not be deleted or destroyed upon the client's request. The deletion or destruction of certain personal information may lead to the termination of a client's business relationship with Hyphen.

In certain instances, clients can give effect to this right by making use of Hyphen's assisted interfaces, e.g. contacting the Hyphen privacy office on the details provided under section 3.

## **17.3 Right to objection**

Clients may object on reasonable grounds to the processing of their personal information where the processing is in their legitimate interest, Hyphen's legitimate interest or in the legitimate interest of another party.

Clients must inform Hyphen of their objection in the prescribed form. Prescribed form 1 is included as an annexure to this notice.

Hyphen will not be able to give effect to the client's objection if the processing of their personal information was and is permitted by law, the client has provided consent to the processing and Hyphen's processing was conducted in line with their consent; or the processing is necessary to conclude or perform under a contract with the client.

Hyphen will also not be able to give effect to a client's objection if the objection is not based upon reasonable grounds and substantiated with appropriate evidence.

Hyphen will provide clients with feedback regarding their objections.

## **17.4 Right to withdraw consent**

Where a client has provided their consent for the processing of their personal information, the client may withdraw their consent. If they withdraw their consent, Hyphen will explain the consequences to the client. If a client withdraws their consent, Hyphen may not be able to provide certain solutions to the client. Hyphen will inform the client if this is the case. Hyphen may proceed to process clients' personal information, even if they have withdrawn their consent, if the law permits or requires it. It may a reasonable time for the change to reflect on Hyphen's systems. During this time, Hyphen may still process the client's personal information.

Clients can give effect to this right by making use of Hyphen's assisted interfaces, e.g. contacting the Hyphen privacy office on the details provided under section 3.

## 17.5 Right to complain

Clients have a right to file a complaint with Hyphen or any regulator with jurisdiction (in South Africa clients can contact the Information Regulator) about an alleged contravention of the protection of their personal information. Hyphen will address client complaints as far as possible.

The contact details of the Information Regulator are provided below.

Street Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Tel no.	27 (0)10 023 5200
Website:	<a href="https://justice.gov.za/inforeg/">https://justice.gov.za/inforeg/</a>
Complaints email:	<a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a>
General enquiries email:	<a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a>

## 18. HOW HYPHEN SECURES CLIENTS' PERSONAL INFORMATION

Hyphen will take appropriate and reasonable technical and organisational steps to protect clients' personal information in line with industry best practices. Hyphen's security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable. This includes the following:

- keeping group systems secure (such as monitoring access and usage);
- storing group records securely;
- controlling the access to group premises, systems and/or records; and
- safely destroying or deleting records.

Clients can also protect their own personal information and can obtain more information in this regard by contacting their Relationship Manager or contact the Hyphen privacy office as detailed under section 3.

## 19. HOW LONG DOES HYPHEN KEEP CLIENTS' PERSONAL INFORMATION?

Hyphen will keep clients' personal information for as long as:

- the law requires Hyphen to keep it;
- a contract between the client and Hyphen requires to keep it;
- the client has consented to Hyphen keeping it;
- Hyphen is required to keep it to achieve the purposes listed in this notice;
- Hyphen requires it for statistical or research purposes;
- a code of conduct requires Hyphen to keep it; or
- Hyphen requires it for lawful business purposes.

**TAKE NOTE:** Hyphen may keep clients' personal information even if they no longer have a relationship with Hyphen or if they request Hyphen to delete or destroy it, if the law permits or requires.

## 20. COOKIES

A cookie is a small piece of data that is sent (usually in the form of a text file) from a website to the user's device, such as a computer, smartphone or tablet. The purpose of a cookie is to provide a reliable mechanism to "remember" user behaviour (keeping track of previous actions), e.g. remembering the contents of an online shopping cart, and actions the user performed whilst browsing when not signed up or logged into their online account.

Hyphen does not necessarily know the identity of the user of the device but does see the behaviour recorded on the device. Multiple users of the same device would not necessarily be distinguishable from one another. Cookies could, however, be used to identify the device and, if the device is linked to a specific user, the user would also be identifiable. For example, a device registered to an app.

By using Hyphen website or applications, clients agree that cookies may be forwarded from the relevant website or application to their computer or device. The cookie will enable Hyphen to know that a client has visited a website or application before and will identify the client. Hyphen may also use the cookie to prevent fraud.

## 21. HOW HYPHEN PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON

If a client is a juristic person, such as a company or close corporation, Hyphen may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, clients, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. These are related persons.

If clients provide the personal information of a related person to Hyphen, they warrant that the related person is aware that they are sharing their personal information with Hyphen, and that the related person has consented thereto.

Hyphen will process the personal information of related persons as stated in this notice, thus references to "client/s" in this notice will include related persons with the necessary amendments.



## 22. ANNEXURES:

### 22.1 FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

### 22.2 FORM 1:

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]



**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 3]

*Note:*

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

<b>A</b>	<b>DETAILS OF THE DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code(    )
Contact number(s):	
Fax number/E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ registered name of responsible party:	
Residential, postal or business address:	
	Code(    )
Contact number(s):	

Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>
<b>D</b>	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or</b> <b>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b> <i>(Please provide detailed reasons for the request)</i>

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*

**FORM 1**  
**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF**  
**SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.**  
**4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
 [Regulation 2]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code(    )
Contact number(s):	
Fax number/ E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code(    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)</b>


Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/designated person*