

Debtsource (Pty) Ltd (“Debtsource”) Information Security Policy Statement

Impetus of the Debtsource Information Security Policy Statement

Debtsource is committed to ensuring that information, which it is in possession of and interacts with is maintained, managed and/or stored by itself and its third parties, in such a way that it is protected from unauthorised disclosure, modification, destruction and processing, with reasonable assurance, from internal and external Parties.

To prevent unauthorised disclosure, modification, destruction and processing of information, Debtsource Management, all its employees (including non-technical staff), third parties, contractors and consultants shall comply to the Debtsource Information Security Policy (*Refer Debtsource Information Security Policy*) as defined and formalised by Debtsource. The Information Security Policy identifies the principles and objectives that must be complied with, to prevent security incidents impacting on Debtsource’s continuity.

Objective of the Debtsource Information Security Policy Statement

The objective of the Debtsource Information Security Policy Statement is to formally document Debtsource’s senior management commitment to implementing appropriate manual and automated mechanisms and measures to protect unauthorised disclosure, modification, destruction, and processing, with reasonable assurance.

We comply with the National Credit Act, 2005 (No.34 of 2005) (“NCA”), the Protection of Personal Information Act, 2013 (No. 4 of 2013) (“PoPIA”) and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No.25 of 2002) which govern the rights to having personal information kept private of which these principles are covered in this Privacy Policy.

Policy Statement

The Directors of Debtsource:

- Have approved an Information Security Policy.
- Shall review and assess the effectiveness of the information security policy and its statement on an at least an annual basis, to maintain its relevancy and appropriateness.
- Shall ensure that continuous monitoring and independent assessments of information security mechanisms and controls are performed.

The Information Security Policy identifies the following information security principles to be adopted by Debtsource, including its third parties:

- The principles of information confidentiality, integrity and availability;
- Continual information security awareness and training to all individuals who encounter Debtsource information;
- Protection of information from unauthorised access;
- Secure back-up of data;
- Secure disaster recovery;
- Meeting information security legal and regulatory requirements; and
- Identifying, containing, assessing, responding, resolving and continual monitoring of security incidents.

Security of Information

Debtsource takes security and the protection of Personal Information and Consumer Credit Information seriously. We maintain physical, technical, and organisational safeguards to protect any data that we collect. We have adopted procedures to secure storage of Personal Information and are committed to working with our data suppliers to protect the security of Personal Information during any transfer to or from us. Furthermore, our clients' Personal Information is only accessible to those Debtsource employee members, agents, or contractors for business purposes and on a strictly need-to-know basis.

To protect privacy and security, we will also take reasonable steps to verify identity before granting access to or making alterations to data we maintain.

The Director(s) of Debtsource shall remain accountable for Information Security at Debtsource.

The Director(s) have delegated the responsibility of implementing Information Security to senior management at Debtsource.

Use and Disclosure of Personal Information

Debtsource limits the use and disclosure of Personal Information to include only what is permitted and prescribed in terms of the NCA, PoPIA or any other applicable laws or in instances where consumers have consented to such collection, use and disclosure.

Confidentiality of Personal Information is important to us. Unless we have consent or permission under national laws, we will not sell, rent, or lease Personal Information to others. We will not use or share Personal Information in ways unrelated to the circumstances described in this Privacy Policy.

A. Our Credit/Risk Reporting Business

Debtsource compiles Credit Information and Credit Reporting for the purposes of promoting safe credit extension and management processes specifically for clients that need to manage business to business credit risk.

The following Information is included in such reports:-

- Identifying information, such as: business name, business registration number, business address, director/member names, director/member ID numbers, physical and postal addresses, contact numbers;
- Account History or Payment Profile: The account history or payment profile is a record of all known accounts with credit or service providers and a history of how those accounts are paid;
- Enquiries: a list of credit or service providers authorised (with consent) or permitted in terms of the NCA to receive a credit report;
- Public Records: Information that is publicly available as permitted by law such as judgments, administration orders, sequestrations, and rehabilitation, liquidation applications, company registration information and tax information;
- Default Data: a default is recorded on the subject's credit profile when it fails to make the payment of money owed. Default data is submitted by the credit or service providers to credit bureaus;
- where applicable, to create a user account (login, username, and password);
- to fulfil any requests for any information which the subject is entitled to request and access;
- to provide service and support;
- to help Debtsource develop, deliver, and improve our products, services, content, and marketing; and
- for internal purposes such as auditing, data analysis, and research to improve Debtsource's products, services, and customer communications.

B. Subscription to the Debtsource Newsletters

Subjects may sign up for Debtsource newsletters by clicking the subscription function on the Debtsource online home page (Debtman) that requires a name, valid email address, and company name. It states that Debtsource will get in contact with the subject via email. In case one no longer wants to receive such communication, one may opt-out of such communications by clicking on the unsubscribe functionality. Debtsource only uses the information provided to group communicate information pertinent to our industry and for no other reason.

C. Compliance with laws and regulations

Debtsource may only access, use and/or disclose Personal Information without consent in exceptional circumstances. These include circumstances where such action is necessary to:

- comply with the law or legal process served on Debtsource;
- comply with requests for information from police or government authorities;
- protect and defend Debtsource's rights or property;
- protect the public interest;
- act in urgent circumstances to protect the personal safety of Debtsource employees or members of the public;
- where applicable, with implied consent; and
- to the extent permitted or required in terms of the NCA, PoPIA and other relevant national legislation.
- **Recruitment:** When a subject applies for employment, Debtsource will use Personal Information for recruitment purposes only.

Rights and Participation

Debtsource aims to ensure that Personal Information is accurately recorded. To be able to achieve this, Debtsource adheres to processes that help ensure and maintain data accuracy.

When gathering Information, Debtsource works with data suppliers to increase their awareness of the importance of providing only Information that is accurate, complete, and up to date. Debtsource however, cannot alter the information reported by such data suppliers, unless the information is determined to be wrong, incomplete, or inaccurate. If our clients do not agree with the accuracy of information Debtsource has on file, procedures are in place to ensure that such information is verified, and where appropriate, amended or corrected. Debtsource however relies on others to bring any such information challenges to our attention.

Unless otherwise provided in any laws, Debtsource clients and data subjects have the right to access, update, correct or object to processing of one's Personal Information by contacting:

- **Email:** info@debtsource.co.za
- **Phone:** **+27 11 348 7000**

Debtsource makes reasonable efforts to incorporate the changes in Information that we maintain as soon as is practicable.

Our clients and data subjects have the right to lodge a complaint with the Information Regulator:

- **by e-mail:** info@justice.gov.za;
- **to the following postal address:** SALU Building, 316 Thabo Sehume Street, PRETORIA; or
- **by telephone:** 012 406 4818; or **by Fax:** 086 500 3351.

Compliance and Enforcement of this Information Security Policy

Our compliance with this Information Security Policy is monitored on an ongoing basis. Debtsource reserves the right to modify this Policy and the Information Security Policy posted at any time via the Debtsource website, which shall be deemed to be the Security Policy then in effect.

Debtsource encourages any queries or concerns on the Security Policy to be directed to us at info@debtsource.co.za and we will ensure you are contacted without delay in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Security Policy.

All Debtsource employees (including non-technical staff), third parties, contractors and consultants shall comply to the Debtsource Information Security Policy and have confirmed this commitment to Debtsource.

Signature: *Frank William Knight*

Position: Chief Executive Officer

Date: 10 June 2021