

VodaLend BTA – Privacy Supplement

Both Vodacom Payment Services (Pty) Ltd (“VPS”) and Lula Lend (Pty) Ltd (“Lula Lend”) are committed to respecting the privacy of your personal information. To demonstrate their commitment, VPS and Lula Lend have created this privacy supplement to communicate their intent to provide effective processes for the appropriate handling of such personal information and to comply with applicable legislation that governs the authentication, protection and disclosure of personal information.

This privacy supplement explains how VPS and Lula Lend processes your personal information for the Business Term Advance product hosted on <https://vodalend.vodacombusiness.co.za> (collectively the “Platform”) to potentially offer you a business term advance. Importantly, it is designed to provide additional contextual information to that already provided by VPS and Lula Lend in their respective privacy notices/policies. For more information on the VPS privacy notice please [click here](#). For more information on the Lula Lend privacy policy please [click here](#).

This privacy supplement explains the information that is collected via the Platform and how it will be used by both VPS and Lula Lend.

By registering and / or providing personal information on the Platform, you hereby acknowledge the processing activities outlined both herein and within the respective privacy policies / notices mentioned above.

Responsible Parties

VPS and Lula Lend are joint responsible parties in terms of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

How to contact us

Your opinion matters to us – if you have any questions about this privacy supplement, you can email us at: askpopi@vodacom.co.za or you can write to our privacy team at:

The Information Officer – Mr Ricardo Platt
Vodacom Payment Services (Pty) Ltd
Vodacom Corporate Park
082 Vodacom Boulevard
Midrand
1685

Personal information we collect about you

Information we collect about you

- VPS and Lula Lend will collect personal information when you register and / or input personal information on the Platform. The personal information collected will include your company registration information, your annual turnover and / or any information necessary (including financial and / or creditworthiness information) or required by the applicable law in order for VPS and Lula Lend to provide the business term advance product.
- VPS and Lula Lend may collect additional personal information when you apply for the business term advance product on the Platform. The personal information collected may include, the business registration number, nature of business, occupation address, source of funds and creditworthiness.
- VPS and Lula Lend will also collect personal information from third-party information sources to fulfil its obligations to comply with the requirements of the applicable law.
- We may also collect anonymous analytics information on how potential customers use the Platform in order to improve the Platform and troubleshoot. We use a variety of analytics methods including what is commonly

referred to as “Big data analytics”. Big data analytics are mathematically driven analysis techniques on large and varied data sets (that is why it is “big” data) to uncover hidden patterns and hitherto unrevealed trends.

- We use our analytics to, for example:
 - Conduct market research and to carry out research and statistical analysis, including to monitor how customers use our networks, products and services; and
 - Frame our marketing campaigns and determine how we might personalise those.

How we use your personal information

VPS and Lula Lend processes and discloses your personal information for specific and limited purposes. These include:

- Processing bank account details to facilitate payments of approved advances.
- Processing of personal information to assess and handle any customer queries, to develop and improve our products, services, communication methods and the functionality of the Platform.
- Once registered on the Platform, we may contact you to keep you informed about new and existing products and services, competitions, prize draws and other promotions and we may use your personal information to run those competitions, prize draw, events and promotions, only to the extent that you have not, at any stage, objected to receiving such marketing communications. We will provide you with an opportunity to Opt-Out of any further direct marketing activities at each instance you are contacted.
- If you have given your permission, we will also contact you to let you know about products and services of Vodacom Group companies including Vodacom, Vodacom Insurance Company Limited and Vodacom Life Assurance Company Limited products and services and those of other companies which we think may interest you.
- Processing of personal information to create unique personalised offers based on your provided application information on the Platform.
- Disclosure of your application personal information to third party lenders and / or service providers to facilitate the potential provision of a related lending product and / or service where your application for a business term advance has been unsuccessful and / or rejected by Lula Lend.
- Disclosure of personal information to Vodacom, Vodacom Insurance Company Limited and Vodacom Life Assurance Company Limited to facilitate the purchase of Vodacom, Vodacom Insurance Company Limited and Vodacom Life Assurance Company Limited goods and services.
- Processing your personal information for the potential provision of both related and unrelated lending products / services that may be offered by VPS or Lula Lend.

Where applicable, VPS and / or Lula Lend will share information about you with:

VPS may also transfer and disclose your personal information to third parties who may process information on our behalf:

- To comply with a legal obligation;
- When we believe in good faith that applicable law requires it;
- At the request of governmental authorities conducting an investigation;
- To verify or enforce our “Terms and Conditions” or other applicable policies;
- To detect and protect against fraud, or any technical or security vulnerabilities;
- To respond to an emergency; or otherwise;
- To protect the rights, property, safety, or security of third parties, VPS and Lula Lend; and
- To potentially offer you alternative and / or additional products / services related to business term advance.

What about the security of your personal information?

- VPS and Lula Lend takes the security of your personal information very seriously. We takes every effort to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

- Our measures include implementing technology, policies and processes aimed at protecting the confidentiality, integrity and availability of your personal information. We will update and refine these measures on an ongoing basis.
- Access to your personal information is only permitted among our employees and agents on a need-to-know basis and subject to strict contractual confidentiality obligations when processed by third parties.

How long we keep your personal information for?

We may not retain your personal information any longer than is necessary for achieving the purpose for which your personal information was collected or subsequently processed. We will keep the personal information for a period which enables us to handle or respond to any complaints, queries or concerns relating to the product and / or services offered via the Platform, unless:

- The retention of your personal information is required or authorised by law.
- We reasonably require your personal information for lawful purpose related to our function or activities.
- The retention of your personal information is required by a contract that we enter into with you.
- You or competent person consent to the retention of personal information relating to a child.

VPS and Lula Lend may also retain your personal information for the following reasons:

- Your personal information may also be retained so that we can continue to improve your experience with us and to ensure that you potentially receive alternative and / or related products or services via the Platform.
- We will actively review the personal information we hold and delete it securely, or in some cases anonymise it when there is no longer a legal, business or consumer need for it to be retained.

Keeping your personal information secure

We have specialised security teams who constantly review, improve, and ensure the implementation of appropriate, reasonable technical and organisational measures to protect your personal information from unauthorised access, accidental loss, disclosure, or destruction. We are required in terms of POPIA to notify you and the Information Regulator, if any of your personal information has been compromised.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your personal information on their site.

The same applies to any third-party websites or content you connect to using our products and services.

You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.

Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

Your rights

At VPS and Lula Lend, we are committed to processing personal information honestly, ethically, with integrity, and always consistent with applicable laws and our values. Below we set out details on how you can exercise your rights. Please note, under certain circumstances these rights may be limited if we still have lawful grounds to process your personal information. If you have a question or cannot find the answer, please contact the privacy team via the contact details provided above and /or in the respective privacy policy / notice mentioned above.

Rights related to automated decision-making

VPS and Lula Lend may process your personal information using automated means. An automated decision is a decision that is made solely by automatic means, where no humans are involved in the decision-making process related to your personal information. Automated processing on the Platform is conducted to ensure we provide our products and services in a responsible manner i.e. so as to ensure you are not overly indebted.

Right to correct personal information

If you become aware that any of the information we keep about you is incorrect or outdated, you can contact the privacy team at askpopi@vodacom.co.za.

Right to access personal information

You have the right to request a record or description of personal information that we hold about you. This includes the right to request VPS or Lula Lend to confirm, free of charge, whether or not it holds any personal information about you; as well as information about the categories of third parties who have, or have had, access to your personal information. To make this request please contact our privacy team at askpopi@vodacom.co.za

Right to object to use of personal information

You have the right, in certain circumstances, to object to VPS / Lula Lend processing your personal information. In order for us to provide you with products and services, we are required to process your personal information which is necessary for the conclusion or performance of a contract and to give effect to you signing up to the Platform and as such the provision of your personal information is mandatory.

Under certain circumstances, you have the right to object to certain types of processing, including processing for direct marketing (i.e., receiving emails or SMS from us notifying you or being contacted with varying potential opportunities). If you no longer want to receive marketing messages from us, you can choose to opt out at any time.

How to lodge a complaint

If you want to contact us about any of your rights or should you believe that we have used your personal information contrary to applicable law, you undertake to first attempt to resolve any concerns with our Customer Services team at 082 135 or customercare@vodacom.co.za. We will do our best to help but if you are still unhappy, you can contact the Privacy Office at askpopi@vodacom.co.za. If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator at: The Information Regulator (South Africa)

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Email: POPIAComplaints@inforegulator.org.za

Right to restrict use of your personal information

If you feel that the personal information we hold on you is inaccurate, or you believe we shouldn't be processing your personal information, please contact our Customer Services team at 082 135 or customercare@vodafone.co.za. In certain circumstances, for example where you contest the accuracy of your information, or where VPS / Lula Lend no longer requires your information for achieving its purpose but must maintain it for purposes of proof, you have the right to ask us to restrict processing.

Right to deletion

VPS and Lula Lend strives to only process and retain your personal information for as long as we need to. In certain circumstances, for example, where you indicate that your personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, you have the right to request that we erase your personal information that we hold. If you feel that we are retaining your personal information longer than we need, it is worth first checking that your contract with us has been terminated, which you can do with Customer Services. If your contract with us has been terminated, we may still have lawful grounds to process your personal information.

How do we keep this privacy supplement up to date?

- We will update this privacy supplement when necessary to reflect customer feedback and changes in our products and services.
- We will update this privacy supplement when necessary to reflect customer feedback and changes in our products and services. If the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy supplement changes). We will also keep prior versions of this privacy supplement in an archive for your review.
- We will not reduce your rights under this privacy supplement.

Ends.