

PERSONAL INFORMATION PROTECTION POLICY

PERSONAL INFORMATION

Personal information is collected only when an individual knowingly and voluntarily provides it. This information may be required to deliver further services, respond to requests, or address inquiries related to our services.

Our policy aims to protect an individual's personal information and adhere to the privacy laws applicable in South Africa. The Agileworks Group of Companies, which includes Dialogueworks Pty Ltd, Moneyworks Information Systems Pty Ltd, and Agileworks Information Systems Pty Ltd (referred to as "The Group"), collects, stores, and uses personal information provided by an individual to offer software engineering, consulting, financial services and marketing software platforms development and general business systems for clients and systems to manage credit and debt.

USE OF INFORMATION

The Group collects personal or other information for the following purposes:

- Software development and support for financial services and credit and debt management systems
- Supporting our marketing, lead generation, contact centre, lead management solutions and any others as we might add in future
- Audit and record-keeping solutions like Moneyworks and related services
- Following an individual's instructions
- Informing an individual of services
- Ensuring our business caters to individual needs

Personal information submitted by an individual is used solely for its intended purpose. Correspondence containing personal information is stored in archives for record-keeping and backup purposes only.

The Group will not share information with any third parties without an individual's consent, for any purpose whatsoever.

SECURITY

The Group strives to maintain the security, integrity, and privacy of personal information provided by individuals. We continually review and update our security measures to protect personal information from unauthorised access, disclosure, alteration, or destruction.

SECURITY MEASURES AND TECHNOLOGICAL ADVANCES

The Group recognises the importance of protecting the privacy of information collected about individuals, in particular information that is capable of identifying an individual ("personal information").

The Group will update its security measures in accordance with future legislation and technological advances. Although no data transmission over the Internet can be guaranteed as completely secure, we will endeavour to take all reasonable steps to protect the personal information that individuals submit to The Group or to our online products and services. We are committed to maintaining the highest standards to ensure the integrity of our systems.

The Group may engage with other organisations to provide support services. Third parties are obliged to respect the confidentiality of any personal information held by The Group. A Service Level Agreement is in place with all third parties to ensure adherence to all Privacy Policies.

The Group's employees are obliged to respect the confidentiality of any personal information held by The Group. All employees are required to sign an employment contract that includes a confidentiality clause.

The Group will not reveal any personal information to anyone unless:

- It is in the public interest
- The Group needs to do so to protect their rights
- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law

The Group endeavours to take all reasonable steps to keep secure any information which they hold about an individual and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact The Group to have the information corrected.

CONDITIONS FOR LAWFUL PROCESSING OF PERSONAL INFORMATION

In accordance with the POPI Act, The Group must comply with eight conditions to ensure that the processing of personal information is lawful, which includes the following conditions:

1. Accountability
2. Processing Limitation
3. Personal information may only be processed in a lawful and reasonable manner that does not infringe on the privacy of the data subject. Personal information may only be processed if:
 1. The data subject or a competent person, where the data subject is a child, consents to the processing;
 2. Processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
 3. Processing complies with an obligation imposed by law on the responsible party;
 4. Processing protects a legitimate interest of the data subject;
 5. Processing is necessary for the proper performance of a public law duty by a public body;
 - or
 6. Processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.
 7. The Group will also ensure that any personal information that is processed by it was obtained directly from the data subject.
4. Purpose Specific: The Group will process personal information only for specific, explicitly defined, and legitimate reasons. The Group will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.
5. Further Processing Limitation: Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose. Therefore, if The Group wishes to process existing personal information for a purpose other than the purpose for which it was originally collected, The Group will first obtain additional consent from the data subject.
6. Information Quality: The Group will take reasonable steps to ensure that all personal information collected is complete, accurate, and not misleading. Where personal information is collected or received from third parties, The Group will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or through independent sources.
7. Openness: The Group will take reasonable steps to inform all data subjects whose information is being collected of:
 1. The information being collected and where the information is not collected from the data subject, the source from which it is collected;
 2. The name and address of the responsible party;
 3. The purpose for which the information is being collected;
 4. Whether or not the supply of the information by that data subject is voluntary or mandatory;
 5. The consequences of failure to provide the information;
 6. Any particular law authorising or requiring the collection of the information;
 7. The fact that, where applicable, the responsible party intends to transfer the information to a third country or international organisation and the level of protection afforded to the information by that third country or international organisation.
8. Security Safeguards: The responsible party must ensure the integrity and confidentiality of personal information in its possession or under its control by implementing appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction

of personal information; and unlawful access to or processing of personal information. To achieve this, the responsible party must take reasonable measures to:

1. Identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
 2. Establish and maintain appropriate safeguards against the risks identified;
 3. Regularly verify that the safeguards are effectively implemented; and
 4. Ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.
9. Data Subject Participation: A data subject may request whether their personal information is held, as well as the correction or deletion of his or her personal information held by The Group. The Group will take all reasonable steps to confirm your identity before providing details of your personal information.

CONTACT INFORMATION

Any questions relating to The Group's POPI policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: Hardy Jonck

Telephone number: +27 (21) 813-6003

Email: legal@agileworks.co.za

Postal address: 12 Eaton Road, Gardens, Cape Town, 8001

Physical address: 12 Eaton Road, Gardens, Cape Town, 8001