ELULA PRIVACY NOTICE AND POLICY

At Status Vetting Services (Pty) Ltd t/a Elula Credit management Solutions (Elula) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act, 2013 (No.4 of 2013) ("POPIA") the National Credit Act, 2005 (No.34 of 2005) ("NCA"), 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.

Who we are

In this Notice, "Elula" or "we" refers to Status Vetting Services (Pty) Ltd t/a Elula Credit management Solutions.

What is processing of personal information

Personal information is data that can be used to identify a person. It is defined as "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person".
Some examples are: race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

Process or processing means any operation or activity, whether automated or not, concerning personal information, including: collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information.

The information we collect

Elula compiles Credit Information and Credit Risk Assessments for the purposes of promoting safe credit extension and credit management processes specifically for our clients that need to manage business to business credit risk.

We collect and process personal information in respect of our clients, our client's clients and their debtors, our business partners, service providers and other data subjects to provide you with access to our services.

In order for us to provide you with our services, you must provide us with the information that we request, failing which we cannot enter into a relationship with you or assist you.
When you provide us with information about third parties (for example your client's debtors or the credit applicant), we will process their personal information to pursue their legitimate interest in terms of providing credit risk assessments.
You warrant that when you give us personal information about third parties (the credit applicant), this information is accurate and correct and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes.

The type of information we collect will solely be for the purpose for which it is collected and used.
We collect information directly from you where you provide us with your and/or the credit applicant's personal details, for example when you apply for our credit risk assessment services or when you submit enquiries to us or contact us.

We also collect information, which may include credit, financial, payment experiences or criminal information about you and/or the credit applicant from other sources such as:

- Third parties such as credit bureaus and banks for the purpose of conducting credit reference checks;
- Industry Forums wherein members discuss matters of common interest to and concerning the trade credit industry, including payment trends.

We have a duty to take all reasonably practicable steps to ensure your and/or the credit applicant's personal information is complete, accurate, not misleading and updated on a regular basis. To enable this we will always try to obtain your and the credit applicant's personal information from you directly, and we would appreciate it if you would promptly notify us of any changes, to keep our records up to date and accurate. However, we cannot guarantee the security of any personal information that you and/or the credit applicant willingly disclose online.
Where we are unable to obtain personal information from you directly, we will make use of verifiable independent third party data sources.

How we use your information

We will use your and/or the credit applicant's personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your and/or the credit applicant's information may be retained for legal or research purposes.

Use of information includes:

- Identifying and verifying information such as statutory information for the detection and prevention of fraud, crime, money laundering or other malpractice - business name, business registration number, business address, principal names, principal ID numbers, physical and postal addresses, contact numbers, associated or linked businesses;
- The account history or payment profile with a credit or service providers, including trade references;
- Information that is publicly available as permitted by law such as judgments, administration orders, sequestrations, and debt rehabilitation, liquidation applications, company registration information and tax information;
- 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 conduct credit reference searches or verification;
- For operational purposes, credit scoring and assessment and credit management;
- For audit and record keeping purposes;
- In connection with legal proceedings
- to help Elula develop, deliver, and improve our products, services, content.

We may obtain and share information about your and/or the credit applicant's credit worthiness or the credit worthiness of any payer with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history and sharing of information for purposes of risk analysis, tracing and any related purposes.

Disclosure of information

We may disclose your and/or the credit applicant's personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Third parties for the purposes listed above, for example credit reference, fraud prevention agencies and law enforcement agencies;
- Industry Forums wherein members discuss matters of common interest to and concerning the trade credit industry, including the payment experience of debtors;
- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your and/or the credit applicant's personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your and/or the credit applicant's information with the same level of protection as we are obliged to.

Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require.

Please note that any such access request may be subject to payment of a legally allowable fee.

Correction of your information

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us at info@elula-cms.co.za.

Deletion of your information

You agree that we may keep your personal information until we destroy your and/or the credit applicant's information based on Elula's destruction standards. You have the right to ask for deletion or destruction of your personal information – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may do this by contacting us at info@elula-cms.co.za and specify what information you would like us delete.

How to contact us

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the email address listed above on or on our website, www.elula-cms.co.za.