



## Privacy Policy and Terms of Use

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**Effective Date:** 11 January 2018  
Version: 2.0

We thank you for interacting with us and/or visiting our website. The purpose of this privacy policy is to inform you how we deal with the personal information you give to us. Please bear in mind that the terms and conditions of this privacy policy constitutes a legally binding agreement between you and Stratfin Solutions (Pty). By interacting with our agents as well as accessing, browsing and/or using our website, you acknowledge that you have read, understood, and agree to be bound by these terms and conditions, as may be amended from time to time. If you do not agree to these terms and conditions you must promptly exit the website, as further use will automatically bind you to these terms and conditions.

Our Privacy Policy is important to us. We are committed to protect the personal information of our customers/visitors and value the information that you chose to provide us with. We adhere to the principles as outlined in Section 51 of the Electronic Communications and Transactions Act, 2002 (ECT Act) as well as the provisions contained in the Protection of Personal Information Act 4 of 2013 (PoPI Act). In line with these principles, Stratfin Solutions undertake to:

- Obtain your permission to process your personal information;
- Only use your personal information for the purpose for which it was obtained and not for any other purpose, unless you give us your express permission to do so or unless we are required to do so by law;
- Only retain your personal information for as long as we are legally required to do so.

#### **What is Personal Information?**

Personal information is defined as any information provided by you to us over the internet, email or telephone or any other channel for instance when applying for an Edu-TaxBack Bursary Benefit "EBB".

In terms of PoPI, Personal Information is defined as: information relating to a natural/juristic person, including, but not limited to—

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular
- demographic information
- information related to your relatives
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.



## **Processing of your Personal Information**

The processing of personal information includes, *inter alia*: collecting, storing, using, receiving, erasing, destroying, backing-up, transmitting, changing, organising and sharing of your personal information.

The type of information we collect shall depend on the purpose for which it is collected and used. We shall only collect information that we need for that particular purpose and no more than necessary. In some instances, we shall inform you what information you are required to provide to us and what information is optional.

Primarily, information shall be collected directly from you, however, we may also collect information about you from other sources, with or without your consent. We may collect information about you from sources which are publicly available. Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

## **What do we do with your Personal Information?**

Your personal information is collected for the primary purpose of providing and administering you with an EBB and for all other activities and processes incidental to and relevant to this purpose, including but not limited to –

- providing you with information about our EBB products and/or services you have requested and notifying you about important changes or developments relating to these products and/or services;
- to follow up as part of our customer care procedures;
- updating our records about you;
- internal record keeping;
- to improve our products and services;
- conduct market research;
- comply with regulatory obligations
- carry on audits;
- keeping you informed of promotions
- evaluating the effectiveness of our marketing and for research, training and statistical analysis with the aim of improving our services;
- to contact you for market research purposes, where you have consented to this

## **What is the purpose of collecting your Personal Information?**

As a service company, we require your personal information for the following reasons:

- process applications for EBB;
- administering your EBB;
- to provide you with access to our services and support;
- monitor and analyse your conduct relating to the EBB
- develop new products and services;



- to help us improve our offerings to you;
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- to conduct market or customer satisfaction research or for statistical analysis;
- for audit and record keeping purposes;
- in connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

### **Information about minors**

Information about minors is collected with the consent of their parent, guardian or close relative. This information collected by Stratfin Solutions is required only to process and implement the EBB and to allow for the relative / parent to participate and will in no way infringe on the individual privacy of the child disproportionately.

### **Disclosure of your Personal Information**

Your personal information shall be kept confidential; however, we shall disclose it to the following third parties as may be legally required and we may be required to do so :

- Service providers
- Stratfin Solutions authorised personnel – required to fulfil their responsibilities
- Court of Law;
- The Information Regulator;
- Tax Authorities (if requested by them).

We have agreements and security measures in place to ensure that all third parties to whom your personal information is disclosed comply with the terms and provisions of the PoPI Act. We ensure that third parties fully understand the duties and obligations they become encumbered with in retaining the privacy and integrity of your personal information.

### **Security measures to ensure Protection of your Personal Information**

Due to the nature of the internet, information submitted by our website may not be secure, unless submitted by/through a secure connection. We do however have reasonable security measures in place to protect your Personal Information. Unfortunately, we cannot assume any guarantee for other providers whose websites you might reach through links on our website. We would also like to inform you that we cannot control the confidentiality, access or dissemination of any information that is retrieved through the use of “cookies” or information retrieved through the collecting and storing of IP addresses of visitors to this website.

Our website may offers a self-service login for clients, and should you choose to use this facility we strongly advise you to safeguard your login details in order to prevent unauthorised access to your personal information.

Your confidential information that we hold about you is kept confidential by deploying the following safeguards;

Tel: 011 887 0145 | Fax: 0866330517 | Email: [admin@stratfin.co](mailto:admin@stratfin.co) | Website: [www.stratfin.co](http://www.stratfin.co)  
Reg no: 2018/039455/07 | Stratfin House: 43 11<sup>th</sup> Road Kew, 2192



physical access control to our building, firewalls, data encryption, password access.

### **Access to your Personal Information**

You may contact our offices to enquire what personal information we hold for you. We shall make the information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

### **Changes to your Personal Information**

PoPI requires us to store information which is accurate and updated. You may update, correct, amend or delete your personal information at any time either via the Self-Service portal on our website, via the mobile app or by sending a request to our Information Officer at [admin@stratfin.co](mailto:admin@stratfin.co)

Please note that before any changes to your personal information is made, we will take all reasonable steps to confirm your identity.

### **Complaints**

You have the right to address any complaints you may have regarding your personal information to our complaints department, as per our Complaint Resolution Policy, alternately you may contact the Personal Information Regulator:

The Information Regulator (South Africa)  
316 Thabo Sehume Street  
Pretoria 0001  
Tel: 012 406 4818  
Fax: 086 500 3351  
[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

### **Amendments to this Privacy Policy**

Please note that Stratfin Solutions reserve the right to make amendments and/or changes to this privacy policy from time to time and will take all reasonable steps to inform you of any such amendments or changes. You are also requested to please check our website periodically to inform yourself of any changes.

### **Consent to process Personal Information**

By submitting your details to us and/or using our website and taking out a policy with us, you accept the terms and conditions of this policy and consent to the processing of your personal information by Stratfin Solutions.

### **Other Important points take note of:**

1. All information on the website is intended as general information about our company, products and services.



2. While all attempts are made to ensure that the information published is true and correct at all times, we will not be held liable for any incorrect information published, nor will we accept any liability when you opt to use our website.
3. Should there be any discrepancies, our policy wording will apply and this may be found on our website or may be requested at [admin@stratfin.co](mailto:admin@stratfin.co)
4. We own the copyright and intellectual rights to the content on our website. Please obtain permission from us before using any logo's, graphics, product information etc.
5. Should you reproduce any part of our website in any form without our consent, we are entitled to take legal action and any legal fees and/or costs will be for your account.
6. Our contact details displayed on this website may not be used for any electronic marketing or database purposes.
7. Before providing links through to our website, please obtain prior consent from us.
8. While we will attempt to ensure that our website and downloads remain virus free, we cannot control or promise that you will not be at risk while using our website.
9. We may at any time, without notice and our discretion, amend this privacy policy, suspend or terminate any functions or products on this website and from time to time perform routine maintenance on the site.

