

SIYANQOBA NGAMANDLA

FINANCIAL SERVICES (PTY) LTD

PRIVACY POLICY

Protection of Personal Information Act, 4 of 2013

Company	Siyanqobangamandla Financial Services (Pty) Ltd
Registration No.	2024/830082/07
NCR Registration	NCRCP22239
POPIA Reg. No.	2025-014381
Information Officer	Mkhabela, Nqobile Valentia Veronica
Effective Date	1 May 2026
Review Date	May 2027

Document Information

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Information Officer	Mkhabela, Nqobile Valentia Veronica
Deputy Info. Officer	Dweba, Lunga
Document Title	Privacy Policy — Protection of Personal Information Act, 4 of 2013
Version	1.0
Effective Date	1 May 2026
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Physical Address	10 Van Rensburg Ave, Witbank, Emalahleni, 1035, Mpumalanga
Email	admin@siyanqobangamandla.co.za
Telephone	013 590 0421

Purpose of This Document

This Privacy Policy sets out how Siyanqobangamandla Financial Services (Pty) Ltd collects, uses, stores, shares, and protects the personal information of all individuals with whom it interacts. It is prepared in compliance with the Protection of Personal Information Act, 4 of 2013 (POPIA), the National Credit Act, 34 of 2005, and all other applicable South African legislation. This document is reviewed annually and is effective from 1 May 2026.

1. Introduction

Siyanqobangamandla Financial Services (Pty) Ltd ("we", "us", "our", or "the Company") is a registered credit provider operating under NCR Registration NCRCP22239. We are committed to protecting the privacy and personal information of all individuals with whom we interact — including credit applicants, borrowers, employer partners, employees, and service providers.

This Privacy Policy explains how we collect, use, store, share, and safeguard personal information in compliance with the Protection of Personal Information Act, 4 of 2013 (POPIA) and all related South African data protection legislation. Our Information Officer is registered with the Information Regulator under registration number 2025-014381 and is responsible for ensuring ongoing compliance with this policy.

2. Definitions

In this document, unless the context requires otherwise, the following terms carry the meanings assigned to them below.

"Company" means Siyanqobangamandla Financial Services (Pty) Ltd (Reg. No. 2024/830082/07).

"Data Subject" means any identifiable natural or juristic person to whom personal information relates.

"Information Officer" means Mkhabela, Nqobile Valentia Veronica, designated to ensure POPIA compliance, supported by Deputy Information Officer Dweba, Lunga.

"Personal Information" means information relating to an identifiable, living natural person or juristic person, including name, identity number, contact details, employment history, financial information, and any other information as defined in section 1 of POPIA.

"Processing" means any operation performed on personal information, including collection, storage, use, transmission, erasure, or destruction.

"Responsible Party" means the Company as the entity that determines the purpose and means of processing personal information.

"Special Personal Information" includes health records, biometric information, criminal history, religious beliefs, race, and political views as defined in section 26 of POPIA.

3. Our Information Officer

The Company has designated an Information Officer and a Deputy Information Officer, both registered with the Information Regulator, who are responsible for overseeing POPIA compliance and handling all data protection matters. All requests relating to personal information — including access, correction, deletion, or objection requests — must be directed to the Information Officer at the contact details set out below.

Information Officer	Mkhabela, Nqobile Valentia Veronica
Deputy Info. Officer	Dweba, Lunga
Appointment Date	13 June 2025
Email	admin@siyanqobangamandla.co.za
Telephone	013 590 0421
Address	10 Van Rensburg Ave, Witbank, Emalahleni, 1035, Mpumalanga

4. Personal Information We Collect

The Company collects personal information that is necessary to assess creditworthiness, administer loan facilities, manage employer partnerships, and comply with all applicable legal and regulatory obligations. We do not collect personal information beyond what is required for these purposes. The table below summarises the categories of information we collect and the types of data within each category.

Category	Examples
Identity Information	Full name, identity number, date of birth
Contact Details	Physical address, postal address, email, telephone number
Employment Information	Employer name, job title, employment status, payslips
Financial Information	Bank account details, income, credit history, bureau reports
Special Personal Information	Biometric data (identity verification only); criminal history (credit assessment only)
Third-Party Information	Credit bureau reports, employer verification, banking confirmation

Personal information is collected through direct submission by applicants via loan application forms and contracts, through credit bureau enquiries, through employer partner confirmations, and through correspondence and communications including email and telephone.

5. Lawful Basis for Processing

The Company processes personal information only where at least one lawful basis applies. The Data Subject provides specific, informed, and voluntary consent when applying for credit. Processing is necessary to fulfil a credit agreement to which the Data Subject is a party. Processing is required to comply with a legal obligation under the National Credit Act or other applicable legislation. Processing is necessary for pursuing the legitimate interests of the Company in managing credit risk and preventing fraud, provided that such interests are not overridden by the rights of the Data Subject.

6. Purpose of Processing

The Company collects and processes personal information solely for the following purposes. For credit assessment, we use personal information to evaluate creditworthiness, conduct affordability assessments as required by the National Credit Act, verify identity and employment status, and assess credit risk. For loan administration, we process personal information to execute credit agreements, manage disbursements, administer payroll deductions through employer partnerships, process repayments, and perform account reconciliation and reporting.

For legal and regulatory compliance, we process personal information to meet our obligations under the National Credit Act, the Financial Intelligence Centre Act, POPIA, and the reporting requirements of the National Credit Regulator. For debt recovery, we may use personal information to manage defaults, initiate procedures in accordance with section 129 of the NCA, and report to credit bureaus. For customer service, we use contact information to respond to enquiries, resolve complaints, and communicate important account information.

7. Retention of Personal Information

Personal information is retained only for as long as is necessary to fulfil the purpose for which it was collected or as required by applicable law. The retention periods applicable to each category of record are set out in the table below. Upon expiry of the applicable retention period, personal information is securely destroyed or de-identified.

Record Type	Retention Period	Authority
Active loan accounts	Duration + 1 year	NCA
Closed accounts (fully repaid)	5 years from closure	NCA
Defaulted accounts	5 years from final status update	NCA
Declined applications	1 year from application date	Company Policy
Credit bureau records	As per bureau regulations	NCA

8. Sharing of Personal Information

The Company may share personal information with third parties only to the extent necessary to fulfil the purposes described in this policy and with appropriate safeguards in place. All third parties are bound by confidentiality obligations and are required to process personal information in accordance with POPIA.

We share information with registered credit bureaus as required by the National Credit Act, including data relating to loan applications, credit agreements, payment history, and defaults. We share information with employer partners solely to facilitate payroll deduction authorisations and employment verification. We disclose information to regulatory authorities including the National Credit Regulator, the Financial Intelligence Centre, the South African Revenue Service, the Information Regulator, and courts and law enforcement where legally required. Service providers such as debt collection agencies, legal advisors, and IT service providers may also receive personal information, and all such parties are bound by written data processing agreements.

Personal information will not be transferred to foreign countries unless the recipient country affords an equivalent level of data protection, the Data Subject has provided informed consent, or appropriate contractual safeguards are in place as prescribed by POPIA.

9. Security Measures

The Company implements appropriate technical and organisational security measures to protect personal information against unauthorised access, loss, misuse, alteration, or destruction. Our measures include password-protected digital systems with role-based access controls, encryption of sensitive data in transit and at rest, locked physical storage for paper-based records, employee confidentiality agreements and ongoing data protection training, regular review and auditing of security controls, and documented incident response procedures.

In the event of a security breach likely to result in harm to a Data Subject, the Company will notify both the Information Regulator and the affected Data Subject as required by section 22 of POPIA. A written incident report will be compiled and retained for a minimum of three years.

10. Rights of Data Subjects

Under POPIA, all Data Subjects have the following rights with respect to their personal information held by the Company. These rights may be exercised by submitting a written request to the Information Officer at the contact details set out in section 3 of this policy. The Company will acknowledge your request within five business days and provide a substantive response within 30 days.

Your Right	What This Means
Right of Access	Request confirmation of and access to personal information we hold about you
Right to Correction	Request correction of inaccurate, irrelevant, or outdated personal information
Right to Deletion	Request deletion of personal information no longer required for its original purpose, subject to legal retention obligations
Right to Object	Object to the processing of your personal information in certain circumstances
Right to Complain	Lodge a complaint with the Information Regulator at www.justice.gov.za/inforeg

11. Consent and Withdrawal

By applying for credit with Siyanqobangamandla Financial Services, you provide consent to the collection and processing of your personal information for the purposes described in this policy, to credit bureau checks and reporting, and to the sharing of information with employer partners for payroll deduction purposes.

You may withdraw consent at any time by notifying the Information Officer in writing. However, withdrawal of consent may prevent the Company from providing services to you, may require the closure of your loan account, and will not affect the lawfulness of any processing already undertaken on the basis of prior consent.

12. Complaints Procedure

12.1 Internal Complaints

Any Data Subject who believes that their rights under POPIA have been infringed may lodge a written complaint with the Deputy Information Officer, Dweba, Lunga, at admin@siyanqobangamandla.co.za or by calling 013 590 0421. The Company will acknowledge the complaint within five business days and provide a substantive response within 30 days.

12.2 Escalation to the Information Regulator

If the Data Subject is not satisfied with the Company's response, the matter may be escalated to the Information Regulator of South Africa at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, by email at complaints.IR@justice.gov.za, or by telephone on 010 023 5207. Further information is available at www.justice.gov.za/inforeg.

13. Updates to This Policy

This Privacy Policy is reviewed annually or following any material change in law or business operations. The current version is published on our website at www.siyanqobangamandla.co.za and is available from the Information Officer on request. Material changes will be communicated to affected Data Subjects where practicable. This version is effective from 1 May 2026 and is due for review in Mrch 2027.

APPROVAL & ADOPTION

This Privacy Policy was reviewed, adopted, and approved by the Information Officer of Siyanqobangamandla Financial Services (Pty) Ltd. It will be reviewed annually or upon any material change in law or operations.

Document Version	1.0
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Next Review Date	May 2027
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Signature: _____ Date: _____

Mkhabela, Nqobile Valentia Veronica

Information Officer | Siyanqobangamandla Financial Services (Pty) Ltd