



# Customer Privacy Notice



Collection, Usage,
Dissemination,
Retention and
Protection of
Personal Information

Barko Financial Services (Pty) Ltd Registration Number: 1999/022139/07

Barko Financial Services (Pty) Ltd is a registered Credit Provider with NCR Registration Number: NCRCP 1764; and

an authorised Financial Services Provider with FSP Registration Number: FSP 45614;

Life Cell Number: 00139 VAT Number: 491 023 7504

## CONFIDENTIAL



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#### Definitions<sup>1</sup> 1.

Biometrics	Means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.	
Child / Children (Plural)	Means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him- or herself.	
Consent	Means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.	
Credit Life Insurance Claim	Means, unless the context indicates otherwise, a demand for policy benefits by a person in relation to a policy, irrespective of whether or not the person's demand is valid. <sup>2</sup>	
Credit Life Insurance	Includes cover payable in the event of a consumer's death, disability, terminal illness, unemployment, or other insurable risk that is likely to impair the consumer's ability to earn an income or meet the obligations under a credit agreement. <sup>3</sup>	
Data Subject	Means a person to whom the personal information relates and whose personal information is captured and processed by BFS.	
<b>De-identify</b>	In relation to personal information of a data subject, means to delete any information that —  (a) identifies the data subject; (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or (c) can be linked by a reasonably foreseeable method to other information that identifies the data subject, and "de-identified" has a corresponding meaning.	
Funeral Policy	Means the optional Barko Financial Services (Pty) Ltd Funeral Policy purchased by you as a customer to cover the Main Member as well as up to thirteen (13) family members' funeral costs, subject to terms and conditions.	
Insurer	Means the insurance company that underwrites insurance, namely Guardrisk Life Limited (registration number 1999/013922/06 and FSP number 76), an authorised financial services provider and an insurer licensed to conduct life insurance business in terms of the Insurance Act No. 18 of 2017.	
Inter-alia	Among other things.	

<sup>&</sup>lt;sup>1</sup> The majority of definitions are extracted from section 1 of the Protection of Personal Information Act No. 4 of 2013.

 <sup>&</sup>lt;sup>2</sup> GN 1407 of 15 December 2017: Policyholder Protection Rules (Long term Insurance), 2017.
 <sup>3</sup> Section 1 of the National Credit Act No. 34 of 2005, as amended.



Next of Kin	Means the person you nominate as an alternative contact person in the event that Barko Financial Services (Pty) Ltd is unable to reach you at the contact information provided for reasons including <i>inter-alia</i> Credit Life Insurance Claims.		
Personal Information	Means information relating to an identifiable, living, natural person and where it is applicable, an identifiable existing juristic person, including, but not limited to —  (a) 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; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) 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; (g) the views or opinions of another individual about the person; and (h) 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	Means any operation or activity or set of operations, whether or not by automatic means, concerning personal information, including —  (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information.		
Prospective or existing customer	Means "you" or "your".		
Means any recorded information —  (a) regardless of form or medium, including any of the following  (i) writing on any material;  (ii) information produced, recorded or stored by means of tape-recorder, computer equipment, whether hardward software or both, or other device, and any masubsequently derived from information so produced or stored;  (iii) label, marking or other writing that identifies or described thing of which it forms part, or to which it is attached by means;			



	<ul> <li>(iv) book, map, plan, graph or drawing;</li> <li>(v) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;</li> <li>(b) in the possession or under the control of a responsible party;</li> <li>(c) whether or not it was created by a responsible party; and</li> <li>(d) regardless of when it came into existence.</li> </ul>	
Responsible Party	Means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. For purposes of this Notice it means Barko Financial Services (Pty) Ltd.	
Special Personal Information	Personal persuasion, health or sex life or biometric information, or crim	

## 2. Introduction and Background

- 2.1. Barko Financial Services (Pty) Ltd (BFS) deeply values the fundamental right to privacy and the utmost confidentiality of the personal information entrusted to us by our prospective and existing customers. BFS handles this information with care and discretion, consistent with the principles enshrined in the South African Constitution, which safeguards the right to privacy.
- 2.2. The Protection of Personal Information Act No. 4 of 2013, including the Regulations relating thereto (collectively referred to as POPIA), is instrumental in upholding this constitutional right to privacy. POPIA is designed to not only give effect to this essential right but also to foster, protect, and encourage the equitable and transparent utilisation of personal information. This aligns seamlessly with BFS' mission and commitment to safeguarding our customers' information in a manner that fully complies with the law.
- 2.3. "Personal information", as defined under POPIA is information that can be used to identify you as a natural person (individual) or a juristic person (legal entity). Examples of personal information are further detailed under clause 1 (Definitions) above.
- 2.4. As part of BFS' unwavering dedication to safeguarding your personal information and in full compliance with regulatory requirements, our information processing practices are in harmony with the provisions set forth in POPIA and the principles articulated in section 51 of the Electronic Communications and Transactions Act No. 25 of 2002.
- 2.5. This Customer Privacy Notice serves to outline how BFS will use and manage your personal information, including both personal and special personal information. This information may be provided by you directly or collected from third parties.
- 2.6. It is crucial that you thoroughly acquaint yourself with the contents of this Customer Privacy Notice before furnishing BFS with any personal information.



- 2.7. By providing BFS with your personal information, you expressly consent to its processing in accordance with the guidelines described in this Customer Privacy Notice.
- 2.8. In the event that you do not concur with any of the provisions contained herein, BFS kindly requests that you refrain from disclosing any personal information to us. It is important to note that, in such circumstances, BFS may be unable to offer its products and services to you.
- 2.9. BFS remains resolutely committed to the preservation of your privacy, ensuring that your personal information is gathered and employed / used in a manner that adheres to the principles of appropriateness, legality, and transparency.

#### 3. Purpose

3.1. The purpose of this Customer Privacy Notice is intended to assist and provide you and relevant stakeholders with a better understanding of the personal information that BFS gathers concerning you. It also aims to explain the methods by which this information is collected, used / employed, shared / disseminated, retained / stored, and protected / safeguarded in compliance with POPIA. Importantly, your data privacy rights are also highlighted in this Notice.

#### 4. Applicability

- 4.1. This Customer Privacy Notice applies to you if you are:
  - (a) a visitor to BFS' Website or a user of WhatsApp for Business;
  - (b) a prospective customer who has applied to use the products and services offered by BFS;
  - (c) an existing customer who uses the products and services that BFS provides; and
  - (d) a Data Subject whose personal information BFS processes.



# 5. Personal information and lawful processing thereof

- 5.1. Personal information is defined under clauses 1 and 2.3 above.
- 5.2. The personal information that BFS may collect about you includes, but is not limited to:

No.	Personal Information	Description	
(a)	Personal Details	Name, surname, former names and surname, gender, sex, date of birth and occupation.	
(b)	Identity Related	An identification number of any type such as a South African ID number or Passport number.	
(c)	Contact Details	Home, work and postal addresses, email address and contact numbers (Cell phone numbers).	
(d)	Biometric Information	Photographic identification and biometric fingerprint linked to your account and used as your signature.	
(e)	Demographic Information	Gender or marital status.	
(f)	Financial related Information	Financial position (income, expenses, obligations, assets and liabilities). Financial behaviour, goals and needs. Relevant banking details and related transactional behaviour. Credit history. Payslips and bank statements. Verification or confirmation of current or previous Debt Review / Administration orders.	
(g)	Employment Information	Current employment status, employer contact details and employment history. Confirmation of employment during the application process to establish a business relationship.	
(h)	Other Information	Provided by completing forms, surveys, or by communicating with BFS, either face-to-face, by phone, email, online, chat or otherwise.  Engagements with BFS including use of products or services, transactions, requests, queries, applications and complaints.  Internal reports and other derivative data based on the personal information that BFS collects.  Records of correspondence and other communications between BFS and you, including email, telephone conversations, live chat, instant messages and social media	
(i)	Online Identifiers	communications.  Internet protocol addresses or your location.	
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(j)	Information for Regulatory Purposes	Information about transaction details, purpose of payment, counterparty / beneficiary information, detection of any suspicious and unusual transaction / activity and information about parties connected to you or these activities / transactions.	
(k)	Investigation related Information	Due diligence checks, sanctions and anti-money laundering checks and external intelligence reports.	

- 5.3. There may be circumstances in which BFS will collect your special personal information, which may include the following, your:
  - (a) biometric details;
  - (b) race or ethnicity (required for statistical purposes or by law);
  - (c) criminal history and behaviour (relating to an offence allegedly committed or proceedings regarding an offence allegedly committed, or the fact that that these proceedings took place). In the process of *inter-alia* the prevention and detection of a crime or alleged crime, to the extent acceptable in terms of privacy laws, BFS may monitor its branches and buildings, including using CCTV cameras and access control;
  - (d) "Credit Life Insurance" Claims:
    - (i) Confirmation of death:

For BFS to process, capture and pay your Credit Life Insurance Claim, BFS will require confirmation of death which includes *inter-alia* a death certificate, contacting your next of kin, or home affairs validations.

(ii) Confirmation of disability:

For BFS to process, capture and pay your Credit Life Insurance Claim, BFS will require confirmation of your disability. It includes any documentary confirmation of your disability for either temporary or permanent disability. If BFS needs to validate your information submitted, it will include *inter-alia* contacting of individuals involved with the confirmation of your disability.

(iii) Confirmation of unemployment:

For BFS to process, capture and pay your Credit Life Insurance Claim, BFS will require confirmation of unemployment. It includes *inter-alia* retrenchment notices, confirmation of your employment status with your employer's Human Resources Department, and alternatively, confirmation of your employment with the Department of Labour; and / or

#### (e) Funeral Claims

(i) For BFS to process, capture and pay your / the Main Member / your family member(s) funeral claim, BFS will require confirmation of death which includes inter-alia a death certificate, contacting your beneficiary / next of kin, or performing Home Affairs validations.



- 5.4. BFS will gather and manage your special personal information exclusively under the following circumstances:
  - (a) with your explicit consent;
  - (b) when it is essential to establish, exercise, or uphold a legal right or obligation;
  - (c) to comply with legal requirements or for historical, statistical, or research purposes; and / or
  - (d) when authorised by law or other applicable legal provisions.

#### 6. Collection and processing of your personal information

- 6.1. BFS collects and processes your personal information to facilitate the provision of financial products and services, which encompass offerings such as the 30-day loan product, funeral and credit life insurance. BFS is obligated to gather / collect, utilise, share / disseminate, and securely retain / store your personal and financial information including *inter-alia* the establishment of a business relationship with you as a customer in terms of Financial Intelligence Centre Act No. 38 of 2001, as amended and affordability in terms of the National Credit Act No. 34 of 2005, as amended (NCA) for the following purposes:
  - (a) Verification of your identity and employment.
  - (b) Determine the risk of fraud, other illicit activities, money laundering, terrorist financing, proliferation financing or similar malpractices.
  - (c) Understanding your financial requirements to offer you the most suitable services and products.
  - (d) Initiating searches, updates, or record placement with credit reference bureaus and government agencies.
  - (e) Evaluation of your eligibility to receive credit, including credit checks and affordability assessments.
  - (f) Establishment of a business or client relationship with you.
  - (g) Contractual engagement with you concerning loans, credit arrangements, and insurance products.
  - (h) Maintaining audit trails and records for record-keeping purposes.
  - (i) Addressing your inquiries and/or complaints.
  - (j) Engaging in communication with you via various channels, including phone, SMS, email, and electronic media such as social media platforms, mobile applications, and online services, to inform you about potentially relevant products and services.
  - (k) Monitoring and recording communication between you and BFS, employing these recordings to authenticate your instructions, assess BFS' service quality, and enhance training and overall service quality.
  - (I) Conducting market research and customer satisfaction surveys.
  - (m) Marketing relevant products and services.



- 6.2. BFS has a legal or regulatory obligation to process your personal information for one of the below mentioned purposes in connection with the product or service you have requested:
  - (a) the prevention, detection, investigation, and prosecution of a crime in any jurisdiction (including, without limitation, money laundering, terrorism, proliferation financing, fraud and other financial crimes). In performing the aforementioned and to the extent acceptable in terms of privacy laws, it may include the
    - (i) processing of special personal information (for e.g., alleged criminal behaviour or providing inaccurate, false, misleading or dishonest information when applying for a loan with BFS, or evading liability through deceit and deception);
    - (ii) monitoring of BFS' branches and buildings, including using CCTV cameras and access control:
  - (b) identity verification;
  - (c) to comply with local legislation, regulations, supervisory body requirements, judgments or court orders, government sanctions or embargoes;
  - (d) in connection with legal proceedings;
  - (e) capture, process and payment of Credit Life Insurance and Funeral Claims;
  - (f) legislative reporting to the Insurer alternatively Regulators including *inter-alia* the National Credit Regulator, Financial Intelligence Centre and the Financial Sector Conduct Authority; and / or
  - (g) credit data submissions in terms of the NCA to South African Credit and Risk Reporting Association.
- 6.3. You retain the right to decline the provision of your personal information to BFS; however, it is important to acknowledge that such refusal may restrict BFS' capacity to deliver the necessary financial products and services to you.
- 6.4. Should you decide to object to your personal information being used for other purposes than the original purpose for which it was obtained, kindly complete and submit Form 1 "Objection to the Processing of Personal Information", (Link to Form 1) to the BFS Information or Deputy Information Officers. The contact details are reflected under clause 15 below. BFS will render such reasonable assistance as is necessary, free of charge, to enable you to make an objection on Form 1.
- 6.5. BFS will exclusively gather information from you that is pertinent and necessary for the services or products within its offering. Furthermore, BFS will only collect and utilise your personal information when it is in full compliance with the law.
- 6.6. While BFS may engage in direct marketing communications, you have the liberty to unsubscribe at any moment by opting out through the relevant internet-based platform or by directly informing us.
- 6.7. In cases where BFS utilises third-party data providers, rest assured that their sharing of your information with BFS will be conducted in strict adherence to the law.



- 6.8. Whenever BFS engages in the processing of your information, it will be based on the following principles:
  - (a) with your explicit consent;
  - (b) as a necessary action in fulfilment of a contractual obligation with you;
  - (c) in compliance with legal requirements;
  - (d) when it serves to safeguard your legitimate interests; and / or
  - (e) when either BFS or a third party holds a legitimate interest to pursue such processing.

#### 7. Processing of children's information

- 7.1. BFS will only collect and process children's personal information with the consent of a competent person, which may include a parent, legal guardian, or another legally authorised individual, or when such collection and processing are permitted by law.
- 8. The manner in which BFS collects your personal information
- 8.1. BFS employs various methods to gather your personal information, including:
  - (a) **Straight from You**: This occurs when you physically complete a product application form on paper.
  - (b) **Not directly from You**: When you interact with us electronically, such as when browsing our Website or using our mobile applications, such as WhatsApp for Business, BFS may collect information such as your IP address and server logs.
  - (c) Via Third Parties or Agents: BFS may also receive information collected on its behalf by third parties or agents.
  - (d) **Through Other Sources**: This includes data obtained from public databases, data aggregators, third parties (including interactions with third parties), as well as information obtained from other financial institutions, credit bureaus, and fraud prevention agencies.
- 8.2. BFS collaborates with various third parties who may be involved in collecting your personal information, including *inter-alia*:
  - (a) Banks, other Financial Institutions and Service Providers
  - (b) Law Firms
  - (c) Business Partners
  - (d) Insurance Companies
  - (e) The Insurer
  - (f) Debt Collection Agencies
  - (g) Credit Bureaus
  - (h) Credit Wellness Companies
  - (i) Local Regulators
  - (j) Public or Government Entities
  - (k) The South African Police Service
  - (I) The South African Fraud Prevention Services



- (m) Social-media platforms
- (n) Tracing Agents
- (o) Media Publications
- 8.3. Should you request information regarding the source from which personal information was obtained, especially if it was not directly from you, BFS will provide such disclosure upon request in accordance with applicable laws and regulations.

#### 9. Further processing of your personal information

- 9.1. BFS is committed to processing your personal information only for the specific purpose for which it was initially collected, unless:
  - (a) you have granted explicit consent for additional processing activities;
  - (b) the personal information is publicly available or intentionally disclosed by you;
  - (c) further processing is required to fulfil a legal obligation imposed by law, regulations, supervisory body requirements, or for legal proceedings in court or tribunal; and / or
  - (d) processing of your personal information is necessary for functions mandated or permitted by law to safeguard the public against financial loss resulting from dishonesty, malpractice, or other serious improper conduct by individuals involved in the provision of insurance or other financial services.

## 10. Disseminating / sharing your personal information

- 10.1. In order to safeguard BFS' interests, there may be occasions when it becomes necessary to disseminate / share specific customer information with third parties. For instance, if a payment fails due to insufficient funds in an account or if it is deemed essential to protect the public interest, BFS may share details about a customer's debt with Debt Collection Agencies or Credit Bureaus.
- 10.2. Entities and third parties with whom BFS may share your information encompass a range of possibilities, including:
  - (a) Regulatory Authorities, including inter-alia the Information Regulator, National Credit Regulator, Financial Intelligence Centre and the Financial Sector Conduct Authority
  - (b) Credit Bureaus
  - (c) Debt Collection Agencies
  - (d) Credit Wellness Companies
  - (e) Payment processing service providers
  - (f) Industry bodies and Ombudsmen
  - (g) The South African Police Service
  - (h) The South African Fraud Prevention Services
  - (i) Banks, other financial institutions and Service Providers
  - (i) Insurance Companies
  - (k) The Insurer



- (I) Law firms and Auditors
- (m) Business Partners
- (n) Public or Government Entities
- (o) Tracing Agents
- (p) Other third parties (contractually, by law, or for protecting a legitimate interest)
- 10.3. When BFS discloses personal information to third parties, these parties will be bound to utilise that personal information solely for the purposes for which it was disclosed.
- 10.4. BFS may be compelled to share your personal information to the extent required by law, to achieve the objectives of your policy or contract, in connection with legal proceedings or potential legal actions, or for the protection of customer interests (e.g., fraud prevention or the fulfilment of an agreement).
- 10.5. BFS retains the right to share your personal information exclusively within its various Departments, Divisions, or Functions (such as Branches and Head office).
- 10.6. When sharing your information with recipients, BFS will rigorously adhere to all applicable laws.
- 10.7. BFS will refrain from selling your information to third parties and will engage in marketing activities solely in accordance with applicable laws and your expressed marketing preferences. Communication will occur through your preferred method whenever practical.

## 11. Protection of your personal information

- 11.1. BFS is fully dedicated to safeguarding the security of your personal information. To prevent any unauthorised access, accidental loss, misuse, alteration, disclosure, or sharing of your information, BFS has implemented appropriate security measures to protect the data it collects, including *inter-alia* access rights restrictions to all system users by BFS employees based on the employee's designation.
- 11.2. If you have reason to believe that there may have been a breach or compromise of your personal information, it is essential to promptly report such incidents to BFS' Information or Deputy Information Officers. You can find their contact details in clause 15 below.
- 11.3. For your peace of mind, please note that all online transactions conducted with BFS are subject to encryption, and the storage of your personal information adheres to internationally recognised banking information security standards.



## 12. Retention / Storage of your personal information

- 12.1. BFS will retain and store your information solely for the duration necessary to fulfil a lawful business purpose or as mandated by applicable laws, which may encompass tax legislation and other statutory obligations related to anti-money laundering, combating the financing of terrorism, and proliferation financing.
- 12.2. In certain circumstances, BFS may retain your personal information for an extended duration, either with your explicit agreement or when legally permitted to do so.
- 12.3. Should there be a necessity to retain your personal information beyond the required period, particularly for historical, statistical, or research purposes, BFS will implement suitable defences to ensure that these records are not utilised for any unauthorised purposes.
- 12.4. All information maintained within BFS' systems will be upheld securely in accordance with its Information Security Policies and Standards.
- 12.5. Conditional upon regulatory mandates, BFS may retain your information for varying durations following the termination of its relationship with you. When retaining your information is no longer essential, BFS will diligently undertake all reasonable measures to either destroy or de-identify the regulations.

# 13. What are your Data Protection Rights?

- 13.1. Your data protection rights grant you the ability to make inquiries with BFS to confirm the existence of any information about you. In the event that BFS does indeed possess such information, you have the privilege to request a comprehensive record of your personal data, including details about all third parties with whom BFS has shared your personal information. Subsequently, you may proceed to request BFS to:
  - (a) rectify or delete your personal information held by BFS or under its control, especially if it is found to be inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or obtained unlawfully;
  - (b) destroy or delete BFS' records of your personal information that it is no longer authorised to retain or store in accordance with regulatory requirements. For matters pertaining to 13.1 (a) and (b), please refer to Form 2 – "Request for Correction or Deletion or Destruction of Personal Information or Destroying or Deletion of Record of Personal Information", (Link to Form 2). BFS is committed to providing reasonable assistance, free of charge, to facilitate the completion of Form 2; or
  - (c) opt to discontinue or initiate the receipt of marketing messages from BFS by communicating your preferences in writing or through BFS' Branch Network, Call Centres, or Website.



- 13.2. To verify, update, change, or delete your information held by BFS, you can take the following steps:
  - (a) refer to BFS' Promotion of Access to Information Manual, which is available at <a href="https://www.barko.co.za">www.barko.co.za</a>;
  - (b) contact the Call Centre on 080 777 3777; or
  - (c) visit a BFS Branch.

#### 14. Complaints

- 14.1. If you wish to raise concerns regarding the processing of your personal information, you can do so by reaching out to the BFS Call Centre at 080 777 3777 or by sending an email to privacy@barko.co.za.
- 14.2. In the event that you find BFS' handling of your complaint unsatisfactory, you have the right, in accordance with section 74(1) of POPIA, to submit a complaint to the Information Regulator using the prescribed procedure outlined in **Form 5**, "Complaint regarding Interference with the Protection of Personal Information" (Part 1), (Link to Form 5). This complaint should detail any alleged interference with the protection of your personal information as a Data Subject and can be emailed to the address provided below.
- 14.3. Additionally, as stipulated in section 74(2) of POPIA, if you are dissatisfied with the determination made by an adjudicator pursuant to section 63(3) of POPIA, you, as a Data Subject, may submit a complaint to the Information Regulator using the prescribed method outlined in Form 5, "Complaint regarding Determination of an Adjudicator" (Part 2) (Link to Form 5). For further information, please refer to the contact details provided below in respect to the Information Regulator:

Email	POPIAComplaints@inforegulator.org.za		
Telephone number	010 023 5200		
Physical address	The Information Regulator (South Africa)  JD House 27 Stiemens Street		
	Braamfontein Johannesburg 2001		
Website	www.inforegulator.org.za		

#### 15. Contact Details

The contact details of the Information and Deputy Information Officers of BFS is detailed in the table below.

Information Officer	Mr Jacobus Ignatius de Wet	
Deputy Information Officer	Ms Marta Maria Sesilia (Martie) Ruthven	
Email address	privacy@barko.co.za	
Telephone number	080 777 3777	
Physical address	Menlyn Woods, 291 Sprite Avenue,	
	Faerie Glen, Gauteng, 0081	
Website	www.barko.co.za	



#### 16. Changes to Customer Privacy Notice

- 16.1. At BFS, we uphold the responsibility of routinely reviewing our practices to ensure the adequate safeguarding and responsible utilisation of your personal information, providing you with the necessary assurance.
- 16.2. This process may necessitate revisions to BFS' data privacy policies or adjustments to this Customer Privacy Notice as required.
- 16.3. Any such modifications will be implemented and may become an integral part of any agreement you have with BFS. The updated Customer Privacy Notice will be made available on BFS' Website at <a href="https://www.barko.co.za">www.barko.co.za</a>. BFS will notify you of these changes by displaying a notice on its Website, outlining the modifications and their effective date.
- 16.4. It is important to acknowledge that if you object to or disagree with the changes, BFS may face limitations in maintaining a business relationship with you as a customer or in providing certain products or services.
- 16.5. For any comments or questions regarding this Customer Privacy Notice, please feel free to contact BFS' Information or Deputy Information Officers. You can find their contact details under clause 15 above.

#### 17. Change in ownership

17.1. In the event of a change in ownership, the sale of BFS' assets to another entity, merger, or acquisition, we may transfer the rights associated with the personal information we process to a separate entity, buyer or successor. BFS will communicate this transfer on our Website. Should you have any concerns about the transfer of your personal information to a new entity, buyer or successor, you have the option to request the deletion of your personal information from BFS' records.

#### 18. Conclusion

- 18.1. BFS remains committed to ensuring compliance with the POPIA requirements and in so doing ensuring the protection of your personal information. BFS remains unwavering in its commitment to adhere to the stringent requirements set forth by POPIA. In this steadfast dedication, we prioritise the protection and responsible handling of your personal information as our paramount duty.
- 18.2. We are deeply committed to fostering a secure and transparent environment for your personal data, and we continually strive to implement the highest standards of data protection and privacy. Your trust is invaluable to us, and we take every measure to safeguard it diligently.



- 18.3. Should you have any inquiries, concerns, or require further information regarding your personal information and privacy, please do not hesitate to reach out to our dedicated Information or Deputy Information Officers. You can find their contact details under clause 15 above.
- 18.4. Thank you for entrusting us with your personal information. Your privacy matters, and we are here to uphold it with the utmost integrity and care.

#### **DOCUMENT VERSION MANAGEMENT**

Versio	n	Drafted by	Date
1		Compliance Department	3 October 2023

