



AML Go Privacy Policy

INTRODUCTION

1.1. AML Go (Pty) Ltd., trading as AML Go (hereinafter referred to as “AML Go”) provides you and the entity which you represent (collectively, “you/your”) with access to its Anti-Money Laundering and Credit and Compliance Risk Services.

1.2 Throughout this policy the products and services made available to you, in accordance with the Service Level Agreement you have entered into with AML Go, shall be collectively referred to as “the Products”.

1.3. This Privacy Policy governs the relationship between you and AML Go, as it pertains to your personal information and the personal information which you collect from customers and consumers in the ordinary course of business.

1.4. Your use of the Products is entirely dependent on the acceptance of this Privacy Policy. Should you not agree with the contents of this policy, please do not proceed to make use of the Products. Please note that you will be deemed to have accepted this policy if you click the “I agree” tick-box and continue to use the Products.

1.5. You will be required to accept this policy each time you access the Products, failing which access will not be granted to use the Products.

SCOPE

2.1. This policy contemplates the Personal Information (as defined below) of yourself as well as the Personal Information collected, used, stored and protected in the course of AML Go’s business, including its Products and websites.

2.2. This policy also outlines the choices available to you regarding our use of your Personal Information or the Personal Information collected through the utilization of the Products and how to access, update and request deletion of such information.

2.3. The use of Personal Information shall be limited to the purpose of providing the Products for which you have engaged AML Go.

2.4. This policy is aimed at meeting the statutory privacy requirements applicable within South Africa. This policy will be continually developed and maintained in order to ensure consistent compliance with the aforementioned requirements.

PERSONAL INFORMATION

3.1. Personal Information is information or data which identifies or relates to specific individuals. In respect of this policy, such information will also relate to your customers (business entities and consumers) and includes, but is not limited to, the following information: -

3.1.1. Name;

3.1.2. Age;

3.1.3. Gender;

3.1.4. Ethnicity;

3.1.5. Identity Number/Registration Number;

3.1.6. Assets & Liabilities;

3.1.7. Income

3.1.8. Ultimate Beneficial Ownership;

3.1.9. Payment Records;

3.1.10. Account Numbers;

3.1.11. Payment and/or Deduction dates;

3.1.12. Transactional History of banking accounts;

3.1.13. Agreements/mandates entered into;

3.1.14. Browsing patterns and usage;

3.1.15. Hardware specifications.

YOUR CONSENT & AGREEMENT

4.1. By submission of your details and/or utilization of the Products, you expressly consent to the use and disclosure of your Personal Information, in the manners which will be outlined in this Policy.

4.2. If you, or your customer, object to any of the potential uses of your Personal Information, as outlined in this Part, please do not continue use of the Products.

SECURITY & CONFIDENTIALITY

5.1. In order to render services to you and provide you with use of the Products, AML Go is required to collect and disclose personal information of you and/or Personal Information collected by you from customers. The aforementioned Personal Information will only be disclosed to specific third parties and only for the purposes of providing you with the Products and/or any services which AML Go is required to render in respect of the Products, or as may be required or prescribed by law.

5.2. We understand the value of Personal Information and have therefore taken all reasonable measures to ensure that the Personal Information collected through the use of the Products is protected from loss, misuse or unauthorized access and/or alteration.

5.3. AML Go has undertaken and maintains a series of IT-Security measures and protocols in respect of the Products. Although full disclosure is not required for the purposes of this Policy, such IT-Security measures may be requested from AML Go by directing correspondence to the contact details contained in this Policy.

5.4. AML Go maintains the following internal protocols to ensure the security and integrity of data and personal information: -

5.4.1. Only authorized personnel have access to the data collected, processed and retained through the use of the Products and such personnel are trained and informed of their obligations and responsibilities in respect of safeguarding and protecting the data to which they have access;

5.4.2. No unauthorized personnel have access to the data collected, processed and retained through the use of the Products and any such unauthorized person is aware of the consequences and actions which may be taken against them for accessing, or attempting to access, such data;

5.4.3. Internal policies and protocols provide for continuous engagement with service providers, partners, banks and integrational measures of AML Go, to ensure that the Products and Personal Information are continuously afforded the latest security and privacy updates, whether internally or procured from a service provider, and that all agreements with such service providers, partners, banks, regulators and integrational measures are maintained and renewed.

DATA CONTROLLER & DATA SUBJECTS

6.1. AML Go does not, under the Service Level Agreement entered into for the provision of the Products, collect, process or retain data, of its own accord or without your consent and direction. The role of AML Go in the relationship between it and you is to make the Products available and to continuously maintain and develop the Products for your use and benefit in the conduction of your business. Therefore, without your use of the Products, no data can be collected. Yet, it is the role of AML Go to retain the data collected by you at all relevant times.

6.2. For the reasons set out above, you are the “Data Controller”. You are the one who collects Personal Information from data subjects and directs AML Go to retain, protect and utilize such information in the manner required to give effect to the Service Level Agreement and privacy legislation.

6.3. The customers who enter into credit agreements and business relationships with you and provide you with their Personal Information for the purposes of loan applications, loan agreements and payment mandates are the “Data Subjects”.

6.4. Data Subjects who seek to access, correct, amend or delete data relating to their Personal Information, should address such a request to the Data Controller (you). You are then required to execute the request if: -

6.4.1. the request is reasonable;

6.4.2. executing the request is lawful and does not impede on other requirements which you are required to meet;

6.4.3. the request is not in pursuit of criminal activity, or will allow the Data Subject to engage in criminal activity;

6.4.4. executing the request would not be against public interest and the pursuit of justice; and

6.4.5. you have not received any order or direction from competent authority directing you not to execute such a requests in relation to that specific Data Subject, or a group or collective of Data Subjects which includes the Data Subject making such a request.

6.5. Should a request be received for access, amendment or deletion of data to which you do not have access, and AML Go does have access to such data. The request must be sent to the Information Officer of AML Go, who will investigate and, if appropriate, execute the request.

6.6. If you, or the company which you represent, seek to amend any Personal Information of yourself or of your business which is held by AML Go and not accessible through the Products, a request should be directed to the Information Officer of AML Go, the contact details of which are contained in the latter portion of this Policy.

OUR USE OF INFORMATION AND DATA COLLECTED

7.1. AML Go may, as a result of the Service Level Agreement, transfer and disclose the Personal Information collected through the use of the Products, for the purposes of: -

7.1.1. Providing the Products to you, and complying with instructions received from you;

7.1.2. Verifying your identity, or the identities of other Data Subjects, with whom you conduct business;

7.1.3. Taking credit decisions;

7.1.4. Compliance with Laws, Public Duties, Court Orders and Authorized Investigations;

7.1.5. For the purposes of security and crime prevention;

7.1.6. For AML Go's internal use, with the aim of improving the Products and services which AML Go render in relation to the Products, and for the purposes of market analysis in order to improve the Products, its offerings or that of its associated companies;

7.1.7. The conduction of market research;

7.1.8. Disclosure to credit bureaux for the purposes of drawing credit reports and receiving information contained therein;

7.1.9. Disclosure of payment mandates to registered banks of South Africa in order to create payment instructions and/or deductions;

7.1.10. Providing you with information via email, telephone, or other means in respect of AML Go's products and/or services, from time to time.

7.2. Despite the use of the data and/or Personal Information utilized as described above, the Personal Information will still be utilized in a manner which compliant with the privacy and data laws of South Africa and is afforded the same level of security as data and Personal Information, not being utilized.

7.3. AML Go may disclose or use your data with third parties involved in the process of providing the Products to you. These third parties have been carefully vetted and selected before a trusted relationship is established. All third-party service providers are contractually and statutorily bound to maintain the confidentiality and security of the data and Personal Information they collect, process and retain.

SHARING OF PERSONAL INFORMATION

8.1. The Personal Information which is collected through the utilization of the Products is not, and will never be, sold to third parties. However, Personal Information may be shared with service providers of AML Go for the purposes of fulfilling its obligations to you, in accordance with the Service Level Agreement.

8.2. Personal Information may also be shared with relevant authorities, in the event of a suspected or confirmed data breach.

RETENTION AND DESTRUCTION OF DATA

9.1. The Personal Information which is collected through the utilization of the Products is stored and retained as long as required to fulfil AML Go's contractual obligations to you.

9.2. Data collected by you and stored in the Products will be stored until a request for deletion is received or the data is no longer required for the purpose for which it was collected.

9.3. AML Go will continue to store and retain data and Personal Information until the termination of the Service Level Agreement. On termination, AML Go will allow you the opportunity to download the data collected and retained. On expiry of the period, which will be stipulated by AML Go on termination of the agreement, the data will be deleted, unless AML Go is required to continue to retain the data in terms of applicable laws.

ACCESS TO DATA

10.1. Data Subjects may request access to the data and Personal Information retained by the Data Controller. Such requests must be addressed to the Information Officer of the Data Controller (you).

10.2. If the Data Controller is not able to provide the Data Subject with the data and Personal Information which is the subject of the request, the Data Controller must, within 7 (Seven) business days of the request, notify AML Go of the request and the reason why it is unable to fulfil the request.

10.3. AML Go's Information Officer will then evaluate the request and take the necessary steps to fulfil the request. AML Go will then provide you with the outcome of the request and any further information you need to provide to the Data Subject.

10.4. All requests of Data Subjects must comply with Part 6.4 of this Policy.

COOKIE POLICY

11.1. The website and Products of AML Go may make use of "cookies" to automatically collect information and data through the standard operation of internet servers.

11.2. Cookies are small text files that are placed on your hard drive by a webpage server. Cookies are not able to be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

11.3. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize the web pages on AML Go's website, or register on the website for the Products, a cookie helps to recall your specific information on subsequent visits. This simplifies the process of recording your Personal Information, such as billing addresses, shipping addresses, and so on. When you return to the same AML Go website, the information you previously provided can be retrieved, so you can easily use the features that you customized.

11.4. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Products and services or the websites you visit.

MARKETING

12.1. AML Go may, from time to time, send you promotional emails about its services or Products. If you no longer wish to receive these emails, you may unsubscribe by following the instructions in the email or by contacting AML Go directly.

AMENDMENTS TO THIS POLICY

13.1. This Privacy Policy may be updated from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any material changes by posting the new policy on our website and updating the "Last Updated" date at the top of this page.

CONTACT INFORMATION

14.1. If you have any questions or concerns about this Privacy Policy, or if you would like to exercise any of your rights in relation to your Personal Information, please contact our Information Officer:

Information Officer: [Name]

Email: [Email Address]

Phone: [Phone Number]

Address: [Physical Address]

Please ensure that all requests are sent to the Information Officer to ensure a timely and appropriate response.