



NOTICE OF PROCESSING OF PERSONAL INFORMATION

1 INTRODUCTION

The South African Future Trust ("we" or "us" or "our") is trust established in response to the COVID-19 pandemic and which, amongst others, provides loans to small, medium and micro enterprises, such as your business ("you" or "your").

You are in terms of this document given notice of how we collect, use, store and share ("**process**" or "**processing**") information which tells us who your business is or otherwise relates to your business or your employees ("**personal information**"). We process your personal information to advance and administer your business's loan with us. You are given notice of processing in accordance with the Protection of Personal Information Act No 4 of 2013 ("**POPIA**").

2 PROVISION OF THIS NOTICE TO EMPLOYEES

You undertake to provide this notice to your employees.

3 PRIVACY STATEMENT AND DATA PRIVACY POLICY

We are committed to protecting your and your employee's privacy. We ensure that personal information is handled lawfully, as is required by POPIA and other laws.

We have a data protection policy ("**privacy policy**") in place which provides more detail on how we process personal information. Our privacy policy can be accessed at the QR code at the top of the page or at the link below. This notice should be read with our privacy policy. Where the privacy policy provides more information on processing, the relevant section of the privacy policy is shown as follows:

[Paragraphs 1.1 to 1.2](#)

[Link: chrome](#)

[SAFT-Third-party-Privacy-Policy.pdf \(southafricanfuturetrust.org\)](#)

4 WHY WE PROCESS PERSONAL INFORMATION AND WHAT INFORMATION WE PROCESS

We process your personal information to administer your loan. The personal information we process includes your -

- [contact information](#) - postal address, physical address, email address/s, telephone contact numbers (including landline and cell numbers) and contact person/s;
- [loan information](#) - your loan agreement, loan terms and amounts;
- [financial information](#) - bank, bank account details, payment history (dates and amounts), electronic funds transfer and proof of payment information, outstanding loan balance and whether your loan is in default;
- [communication information](#) - the written communications between us (including emails), telephone records and records or transcripts of your calls with us. Note that this information will include personal information of the employees or other persons who contact us on your behalf;
- [legal information](#) - the existence and status of any enforcement action regarding your loan; and
- [aggregate information](#) - any of the previous information taken together to provide our services to you.

We do not process the information relating to a "**child**" (persons under the age of eighteen years) or "**special personal information**", as those terms are defined in POPIA. Special

personal information includes information about someone's health, sexual orientation, religious beliefs, race, political affiliations, biometric information or information about criminal offences or convictions. You are not permitted to provide us with these types of information.

[Paragraph 3](#)

5 WHY WE ARE PERMITTED TO PROCESS PERSONAL INFORMATION

We are permitted to process personal information because we have a lawful reason to do so, including that -

- processing your personal information is necessary for both you and us to perform in terms of the loan agreement;
- it is in our legitimate interests, namely our business interests, for us to process the personal information for us to provide and administer the loan agreement with you, and we have appropriate and adequate protections in place to ensure your rights and freedoms are protected;
- it is in your legitimate interests, namely your business interests, for us to process the personal information for you to be able to receive the loan and for us to be able to administer your loan with us.

We also process your personal information for the other reasons indicated in paragraph 5 of our privacy policy and further -

- where we have a legal obligation to do so, like when a regulator requires us to;
- where we need to process the information to defend or enforce a legal claim (by or against us and possibly against you if you default on your loan);
- record keeping (including maintaining data bases and back-ups); and

[Paragraphs 4 to 5](#)

- security (the prevention of fraud, money-laundering and cybercrime).

6 THE SOURCES FROM WHICH WE COLLECT YOUR INFORMATION

We collect personal information directly from you, alternatively, from a third party partner or agent involved in delivering the services offered by us. This includes your bank, who onboarded you for purposes of the loan and may continue to assist us in keeping your details up to date or enforcing your loan.

7 WHAT ARE THE CONSEQUENCES OF YOUR FAILURE TO PROVIDE US WITH YOUR INFORMATION?

If you refuse or fail to provide us with your personal information, we will not be able to administer the loan properly and will proceed to enforce our legal rights against you.

8 WHO WE SHARE PERSONAL INFORMATION WITH

We share your personal information with the parties indicated in paragraph 6 of our privacy notice, this includes your bank who previously assisted us with administering your loan and may at present or in the future assist us with keeping our records accurate and up to date, including reconciling the data we have with their records and contacting you or us should there be any discrepancy in your details. Given the parties' previous use of

your bank to administer the loan, you acknowledge that such processing by your bank is lawful and necessary.

We may also share your personal information with our professional advisors insofar as reasonably necessary for the purposes of - managing risks and/or obtaining professional advice.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, including a subpoena, reporting obligation or request by a regulator or tax authority. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure, including any process where we proceed to enforce the loan against your business.

Paragraph 6

9 SECURITY

We ensure that personal information is kept secure, both electronically and physically.

Paragraph 12

10 OVERSEAS TRANSFERS

We do not nor do we intend to transfer your personal information outside of South Africa.

11 KEEPING YOUR INFORMATION ACCURATE

We are in the process of ensuring your details are up to date and correct. As indicated previously, we may require your bank to assist with this process. To this end, your personal information will accordingly be shared between us and your bank.

Ultimately, you are responsible for ensuring that the information we hold about you is accurate and up to date. A failure to do so will affect and may impair the administration of your loan and your relationship with us and could result in us taking legal steps against you. You can contact our information officer at the details indicated in 12 to update your details.

12 YOUR RIGHTS

You have the rights afforded to you in terms of POPIA and indicated at paragraph 9 of our privacy notice, including the right to request access or correction of your personal information.

If you have any questions or concerns about your data or wish to update your contact our information officer, you can contact our information officer at the following details:

Chief Information Officer:	Freek Ludick
Email:	info@southafricanfuturetrust.org
Physical Address:	6 St Andrews Road, Parktown Johannesburg
Postal Address:	PO Box 61631 Marshalltown 2107

If you are unsatisfied with the way we process your personal information you may contact the Information Regulator at the following details:

Email:	complaints.IR@justice.gov.za
Physical address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address:	P.O Box 31533, Braamfontein, Johannesburg, 2017

Paragraphs 13 and 14

13 POLICY REVISION

This notice is subject to being updated. Any update will be loaded on our website.

14 VERSION CONTROL

Last updated June 2023.