

# Confluent

**Confluent  
Privacy Notice**

**1. About this notice**

This privacy notice helps you understand the purpose for which we collect, store, and use your information. We may need to update this notice from time to time, but we will inform you when we do. You should read this notice with our Confluent website terms. If you have any questions, please contact us at: [info@confluent.biz](mailto:info@confluent.biz)

**2. We collect and use your personal information**

**2.1. When you contact us**

When you contact us, we collect the information included in your message. We use this information to communicate with you. We share your information with other subsidiaries or associated companies of the Confluent Group to assist you with your request:

- DebtBusters (Pty) Ltd – debt management
- Just Money Protect (Pty) Ltd and Just Money Motor and Home (Pty) Ltd – life and non-life insurance solutions
- Just Money (Pty) Ltd – financial wellness education and solutions
- Kudough Credit Solutions (Pty) Ltd – credit reports and credit bureau information
- Confluent Services (Pty) Ltd – data processing

**2.2 When you apply for a vacancy**

When you apply for a vacancy, we collect your personal information including your photo, curriculum vitae, education information, work history and a copy of your identity document. We use this information to process your job application.

**3. We may share your information with our trusted suppliers**

We use suppliers and service providers who we trust to help us provide our services to you. They have agreed to keep your information secure and confidential and to only use it for the purposes for which we have sent it to them.

We use other companies or individuals to:

- provide integrated insurance solutions to any consumer struggling with the burden of debt,
- store information,
- obtain credit bureau information and
- help us manage our business, for instance, accountants and professional advisors.

Some of these suppliers or third parties may be located in other countries. These countries may not have the same level of protection of personal information as South Africa. If this is the case, we require that our service providers undertake to protect the personal information that we share with them to the same extent that we do.

Sometimes we need to disclose your information to a third party:

- if we believe that disclosure is reasonably necessary to comply with the law, legal process, or a government request;
- to enforce our contracts and policies;
- to protect our, your or another person's interests;
- to protect ourselves, clients, and the public from illegal activity; or
- to respond to an emergency which we believe in good faith requires that we disclose information.

If there is a change in our company structure or ownership, we may share your information as part of the assets transferred, or the due diligence for that transaction.

**4. We do not keep your information longer than we need to**

We have to keep your personal information for as long as you are our client, or you are waiting for us to contact you. We will not keep it for longer than we need to or than we are legally required to.

**5. How we protect your personal information**

We have implemented reasonable security safeguards based on the sensitivity of the information to protect it from loss, misuse, and unauthorised access, disclosure, alteration, or destruction. But no system is perfect, and we cannot guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

Although we cannot prevent all security threats, we have measures in place to minimise the threat to your privacy should something happen. We will let you know of any breaches that affect your personal information and inform you how you can minimise the impact.

**6. You have the right to be informed about the personal information we have, and what we do with it**

You have the right to:

- ask what personal information we hold about you,
- ask what information was sent to our suppliers, service providers, or any other third party,
- ask us to update, correct, or delete any out-of-date or incorrect personal information we hold about you,

- unsubscribe from any direct marketing communications we may send you,
- object to the processing of your personal information, and
- lodge a complaint with the Information Regulator.

#### **7. Consent to obtain, submit and use credit bureau information:**

7.1 You hereby consent to, and authorise the Confluent Group to contact, request and obtain credit information relating to you from one or more registered Credit Bureaus for the purposes of:

- a) verifying your identity;
- b) assessing your behaviour, profile, payment patterns, indebtedness, whereabouts, propensity to take up a marketing offer, and creditworthiness; and
- c) any other lawful related purpose available from a Credit Bureau,

and you further consent to the Company continuously accessing such information for as long as you have a relationship with the Company.

7.1.2 You authorise the Company to make any reasonable enquiries to verify and research any details provided by you to the Company.

7.1.3 You consent to the Company accessing your information from a Credit Bureau in any format, including but not limited to online access, batch files and raw XML strings, and you acknowledge and agree that any enquiry made for purposes other than a credit application may not be displayed on your credit profile.

7.1.4 You consent to the Company submitting your information, including payment profile information, default information and any other relevant information, to one or more Credit Bureaus, and you authorise such Credit Bureaus to release that information for lawful purposes to third parties.

7.1.5 You consent to the Company using any and all information referred to in this clause 7.1 to market products and services to you, whether directly or indirectly, including through an appointed third party, subject always to applicable law and your right to opt out of Direct Marketing.

You can request access to the information we hold about you or correct your personal information by contacting: [info@confluent.biz](mailto:info@confluent.biz)

It may take us up to 21 days to respond to your request because there are procedures we need to follow. In certain cases, we may require proof of your identity.