

Privacy Policy for PayGo Energy (Pty) Ltd

The privacy of individuals, including our customers and clients, is of utmost importance to PayGo Energy (Pty) Ltd ("Company"). We are committed to adhering to the Protection of Personal Information Act, 2013 (No. 4 of 2013) ("POPIA"). In compliance with Section 18 "Notification to data subject when collecting personal information" of POPIA, this PayGo Energy Privacy Policy ("Policy") provides you, the data subject, with information on the processing for your personal information ("Information") in a clear, suitable and conspicuous manner that is easily accessible.

This Policy aims to set out in clear terms the types of Information collected, the purpose of collection, the source of the Information, the entities with whom such Information may be shared, the data subject's rights and also the reasonable security practices and procedures adopted by the Company in handling such Information. Any terms defined in POPIA have the same meaning when used in this Policy.

Please read this Policy carefully as your proceeding with the use of this website or the use or purchase of any goods or services provided by us ("Services"), or your providing any Information to the Company on or through the use of our website or through any Services, are based upon the assumption that you are providing such Information to the Company voluntarily. Further, the subsequent provisions of this Policy are based upon such an assumption.

Type of Information Collected

In order to provide the Services, the Company may collect and process the following categories of Information:

Information about You

Including but not limited to,

- (i) Identification Data: name, government ID, e-mail, telephone number, your photograph.
- (ii) Credit Reports and Watchlists: requested copies of your credit history which may contain professional and financial information about you. We check for your information in public watchlists such as OFAC lists.
- (iii) Social Media Data: data provided in your social media accounts, including photo, friends list and name.
- (iv) Copies of Documents: collected documentation. including government IDs as well as your photograph.
- (v) Payment Information: information about the payment of your debt and payment defaults.
- (vi) Customer Service: information you provide to us in connection with the Services, including when you communicate with us, by any means, for Customer service purposes.

Information Concerning Your Mobile Device and/or Solar Home Solution

Including but not limited to information regarding the device, operating system, device identifier, SIM information, applications list, internet connection state, application foreground state, etc.

If the device is purchased via PayGo Energy then we collect sale information such as store of purchase, amount, etc.

Information Concerning Your Communication

If you provide specific authorization, we may collect and process information from your mobile device and/or Solar Home Solution related to call logs, power and recharge usage and SMS messages. Before doing so we will contact you and request your specific consent.

Please note under the law some of the information above is considered sensitive data. The Company ensures compliance with the legal requirements called out in the law for processing of sensitive data.

Retention of Information

The Company will retain and use the Information for the period necessary to (i) fulfil the purposes described in this Policy; (ii) comply with legal or regulatory obligations applicable to us; or (iii) fulfil evidentiary purposes in legal, administrative or arbitration proceedings. The criteria considered to determine the retention period include the duration of your relationship with the Company, legal retention periods applicable, and legal prescriptions with respect to possible claims, lawsuits, or administrative and arbitration proceedings in connection with the Services we provide.

Purpose of Collection

The Company will, or may, collect, use, receive, possess, process, store, deal, disclose, transfer or handle Information for the following purposes:

1. When you contract PayGo Energy Services, we need to process your Information to authenticate your identity, assess risk of repayment, and provide access to credit.
2. We process some of your Information for fraud prevention to ensure greater security to PayGo Energy, to you and to the financial system in general.
3. We also need your Information to contact you by any available means, including electronic means, mail or telephone (SMS and others), on matters related to the Services during your onboarding to our Services and later on throughout the services provision. This includes notifying you of changes in the Platform and/or in the Services. We may also contact you to offer or provide information on products or services that may be of your interest.
4. We also process your Information to manage your loan and related payments, including for debt collection purposes.
5. We may process your Information for data analytics, research and statistics, for assessing and studying the profile of our Service's users, and for developing better products, offers and services.
6. And in connection with other business of the Company from time to time.

Automated Decisions

Automated decision-making occurs when an electronic system processes personal data in order to make a decision without human intervention. Part of our procedures, especially the credit assessment, relies on automated decision mechanisms and, so, we guarantee your right to request the reviewing of any decision made exclusively based on automated processing of your data, according to the law.

Sources of Information

The Company collects Information directly from you, your use of the Services, as well as from any third parties whom you may have authorised to share such Information with the Company.

Direct - Information you directly provide to us.

Indirect - Where permitted by law, the Company may collect Information about you from third parties such as credit reporting agencies.

Mobile and/or Solar Home device

The Company collects Information from your mobile and/or Solar Home device via the PayGo Energy mobile application installed on your mobile phone and/or Solar Home device. You may check what information is being collected by PayGo Energy's app in the privacy section of your mobile and/or Solar Home device.

Sharing

The Company may share Information about you with:

- Governmental agencies, courts or regulators, as required under applicable law;

- Any agent, contractor, service provider or other third party in connection with the Company's business and in connection with the provision of the Services; and
- Any other person under duty of confidentiality to the Company.

If the Company is involved in merger, acquisition, financial due diligence, corporate reorganization, bankruptcy proceedings, sale of assets or transition of outsourced services to another provider, your Information may be sold or transferred as part of such a transaction as permitted by applicable law. The Company makes no representations or warranties concerning how any such receiving entities may use or disclose your Information.

International Transfers

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this Privacy Policy.

Your Rights as a Data Subject

Right to Confirm Processing - You have the right to confirm whether the Company is processing your data.

Right to Access and Portability

- You have the right to request access to or solicit a copy of any of your personal information that the Company may hold.
 - The information provided will include public and private entities with whom your personal data has been shared.
 - The information provided will be 'portable', enabling you to transfer to another entity without any hindrance.

Right to Correct or Delete Your Personal Data

- You have the right to request correction of any incomplete, inaccurate or outdated information relating to you.
- You have the right to request correction or deletion of any information about you that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully
- You have the right to request deletion of any information about you that is no longer necessary for achieving the purpose for which the information was collected or subsequently processed.

The right to deletion is subject to certain exceptions under the law such as, but not limited to:

- Information required by the Company to fulfill statutory and regulatory obligations
- Information required to identify fraud, security incidents, exercise certain rights, etc.
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Right to Withdraw Consent

Where the Company has relied on your consent to process particular information and you have provided your consent to process such information, you have the right to withdraw such consent at any time.

Right to Lodge a Complaint

You have a right to bring a claim to the competent data protection authority.

How to Exercise Your Rights

Any request to exercise your rights can be directed to the data protection officer at PayGo Energy. The identity and contact details of the data protection officer can be found at the end of this Policy.

We will need to verify your identity before processing your request. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, or a legal representative of that person;
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We do not charge a fee to process your request. We will respond to your request within reasonable time, as defined by the relevant law.

Children's Privacy

Our services are not directed to children under the age of sixteen and we do not knowingly collect personal information from children under the age of sixteen.

Security Measures

The Company has implemented reasonable security practices and procedures that are in line with internationally accepted standards for the security and protection of Information. These practices and procedures include managerial, technical, operational and physical security control measures commensurate with the nature of Information collected and processed by the Company.

Updates

The Company reserves the right to add, revise, amend, modify or delete any part of this Policy (in part or in full) at its discretion. The updated version of this Policy in force will be posted on the Company's website from time to time. In the event of any change or in case of any requirement arising under applicable law, this Policy shall be deemed to be amended or modified to the extent necessary to comply with such amendment to the applicable law or to meet any requirement under such applicable laws. Whenever we make material changes in this Policy, such changes will be valid, effective and binding after being: (1) disclosed in our Platform; or (2) communicated to you by e-mail; or (3) communicated to you in any other way. If you decide not to continue using the Services after such change, you must apply for the cancellation of your account and/or termination of your legal relationship.

Data Protection Officer

If you have queries concerning your personal data – including requesting access to or correcting the details of your personal data – you may contact:

The Data Protection Officer

PayGo Energy (Pty) Ltd

2 Clamart Rd, Richmond,

Johannesburg, 2092, South Africa

Email: Contact@PayGoEnergy.co.za