

PRIVACY POLICY

1 Introduction

1.1 This privacy policy ("Privacy Policy") applies solely to Personal Information collected by **BetterLife Group Limited** (South African Registration Number: 1992/000443/06) and all of its subsidiaries and website developers (collectively, "**BetterLife**", "**we**", "**us**", "**our**") through:

1.1.1 our websites located at **www.betterbond.co.za**, **www.mortgagemax.co.za**, and **www.betterlife.co.za** other websites controlled by us ("**Website**"); and

1.1.2 the "**BetterBond App**", "**BetterRewards**" and other mobile applications owned or controlled by us (as it is available for download through your app store) ("**Mobile Application**"),

and their respective contents, whether accessed via computer, mobile device, telephone, or other.

1.2 This Privacy Policy applies to the following subsidiaries of BetterLife:

1.2.1 **Betterlife Origination Services Proprietary Limited** (South African Registration Number: 2001/003522/07), acting through its BetterBond and MortgageMax divisions (respectively "**BetterBond**" and "**MortgageMax**") and

1.2.2 **BetterLife Distribution Services Proprietary Limited** (South African Registration Number: 2005/024995/07) being licensed as a financial services provider FSP No. 24015 in terms of section 8 of the Financial Advisory and Intermediary Services Act, 2002 (Act No 37 of 2002) ("**BetterSure**").

1.3 All references to "**you/your**" in this Privacy Policy will be references to registered users of the Website, including service providers and licensees providing home loan origination services through the Website ("**Service Partners**").

1.4 This Privacy Policy explains what information may be collected through the Website, how such information may be used and/or shared with others, how we safeguard it and how you may access and control its use in connection with our marketing communications and activities.

1.5 Please read this Privacy Policy carefully. By using the Website you are acknowledging that you understand and agree to the terms of this Privacy Policy and our views and practices regarding your Personal Information and how we will treat it. In addition, please review our **Terms and Conditions** which governs your use of the Website, the Services provided via the Website, and any content and information you submit to the Website. You can contact us at **privacy@betterlife.co.za** any capitalised terms not defined herein are defined in the Terms and Conditions.

2 Information that we collect on the Website

2.1 We may collect certain Personal Information from you which identifies, or could be reasonably associated with you. Information that does not identify you, such as anonymous or aggregated data, is not covered by this Privacy Policy. We may collect, use and disclose such anonymous or aggregated information in order to evaluate and improve our service offerings, to communicate with our Service Partners or advertisers or for other purposes without limitation.

2.2 For the purposes of this Privacy Policy, "**Personal Information**" means personal information as defined in the Protection of Personal Information Act 4 of 2013 ("**POPIA**")

and includes any information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person (such as our Service Partners) that could reasonably be used to identify you (such as your name, surname, e-mail address, telephone number, mobile phone number, home address, photographs, links to your social identities/networks, Account username and password, and credit card or other financial information).

- 2.3 You agree to provide us with certain Personal Information when you register as a user with us and create a user account ("**Account**") and/or when you communicate with us by email, SMS or telephone and make use of our home loan pre-qualification service, do a credit check through a credit bureau report, when you apply for a home loan or when you elect to make use of the BetterSure insurance brokerage service through the Website ("**Services**").
- 2.4 We reserve the right to modify, replace or discontinue existing Services or products so offered without prior notice to you, except where expressly agreed to otherwise. A full history of the supplied Services is securely stored and accessible for future reference online through your Account.
- 2.5 The Services provided by BetterBond and MortgageMax are not intended to be financial, tax or legal advice and should not be construed as such. BetterBond and MortgageMax and their Service Partners are not financial planners, brokers or tax advisers. Your personal financial situation is unique, and it is your responsibility, given your financial and other individual circumstances, to use any information and advice obtained through the Services appropriately and responsibly when implementing your decisions. Before making any financial decisions or implementing any financial strategy, you should obtain advice from your accountant or other financial advisor who are fully aware of your individual circumstances and never take up a home loan that will stretch your repayment capacity to its maximum. Through our re-qualification service you will be provided with a maximum home loan indication and a lower indication. The lower amount is in our opinion closer to the home loan and purchaser price that you must aim to raise from a bank. Always try to contribute a deposit as this will reduce the risk of lending and may enable you to negotiate better terms and conditions for a home loan. Reliance on product descriptions, opinions, advice or any other information gained from the Services is done entirely at your own risk.
- 2.6 The Website may also ask you to provide other information such as a description of the property that you intend to purchase and details regarding your income and expenses together with documentary proof, such as a copy of your identity document, payslips and proof of address, the latter two documents not being older than three (3) months. You agree that we may retain these documents for a period of three (3) years from date of such documents being submitted to us by you or other authorised third parties. This information, including your Personal Information, may be shared with Financial Institutions (the credit provider for the home loan) and our Service Partners that will be providing you with the Services. If you do not want your Personal Information collected and used by us, please do not create an Account or book Services through the Website.

3 **Credit Reports and appointment of Lucid**

- 3.1 Personal Information provided to the credit bureau will be used to generate a credit report that will be used to providing you with assistance with regards to managing your credit; challenging the accuracy of information contained on your report and investigating and comparing your information held by the credit bureaus.
- 3.2 You do hereby nominate, constitute and appoint LUCID Legal Business Services (Pty) Ltd (2003/016694/07) ("**Lucid**") to be your lawful representative and agent in my name, place and stead, to obtain your credit report and information from either TransUnion Credit Bureau ("TransUnion"), Xpert Decision Systems ("XDS"), Experian South Africa ("Experian") or Compuscan Information Technologies ("Compuscan") credit bureaus, to be used solely for the following purposes:

- 3.2.1 you consent to the credit bureaus releasing a copy of your credit report in PDF or XML format to Lucid and BetterLife;
- 3.2.2 you are aware that you have the right to challenge the accuracy of any information contained on your personal credit report directly with a credit bureau;
- 3.2.3 you confirm that the information furnished herein to Lucid and BetterLife is true and correct.

4 **Information we collect automatically**

- 4.1 Whenever you visit or interact with the Website, we may use a variety of technologies that automatically or passively collect certain information about how the Website is accessed and used. This may include information about (i) your operating system, type of browser and platform, (ii) your use of the Website, including details such as the date, time and length of your visit to the Website, (iii) the resources you accessed and the documents you downloaded and (iv) your location. This statistical data provides us with information about the use of the Website, such as how many visitors visit a specific page on the Website, how long they stay on that page, and which hyperlinks, if any, they "click" on.
- 4.2 This information helps us keep our Website fresh and interesting to our visitors and tailor content to a visitor's interests. The abovementioned information is generally non-identifying information, but if we associate it with you as a specific and identifiable person, we will treat such information as Personal Information.
- 4.3 We may also automatically collect your Internet Protocol address or other unique identifier ("Device Identifier") for the computer, mobile device, technology or other device (collectively, "Device") you use to access the Website. A Device Identifier is a number that is automatically assigned to your Device when you access a web Website or its servers, and our computers identify your Device by its Device Identifier.
- 4.4 The technologies used on the Website to collect information about your use of the Website, including Device Identifiers, may include:
 - 4.4.1 **Cookies**
 - 4.4.1.1 "Cookies" are data files placed on a Device when it is used to visit the Website. We, or third party advertisers may place cookies or similar files on your Device for security purposes, to facilitate Website navigation and to personalise your experience whilst visiting the Website. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our Website and pages visited. Cookies allow us to select which of our offers are most likely to appeal to you and display them while you are on the Website and other websites.
 - 4.4.1.2 We may also use cookies that enable us to serve advertisements of our products and services, including special offers, when you visit other websites.
 - 4.4.1.3 We do not link the information obtained through cookies to your Personal Information. Moreover, we do not obtain, store or maintain any personally identifiable information about you through our use of cookies.
 - 4.4.1.4 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.
 - 4.4.2 **Pixel tags**

A pixel tag is a transparent graphic image, sometimes called a web beacon, clear GIFs or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed. In addition, a pixel tag may tell your browser to get content from another server.

4.4.3 **Website Analytics**

4.4.3.1 This Website uses Mouseflow web analytics service. The service may record mouse clicks, mouse movements, scrolling activity as well as any text you type in this website, except text in password fields. Mouseflow does not collect personally identifiable information that you do not voluntarily enter in this website. Mouseflow does not track your browsing habits across other web sites or text inputted in password fields. For more information see Mouseflow's Privacy Policy at <http://mouseflow.com/privacy/>.

4.4.3.2 We use Google Analytics to better understand how visitors interact with the Website. This service provides non-personally identifiable data including but not limited to data on where visitors came from, what actions they took on our Website and where visitors went when they left our Website. If you would like to learn more about this service, or about choices to opt out from it, please click here. <https://tools.google.com/dlpage/gaoptout/>.

4.4.3.3 If you have any questions regarding any of these matters, you are encouraged to contact us.

5 **How we use the information collected through our website**

5.1 We will only process your Personal Information in accordance with this Privacy Policy and for the purpose for which it has been collected by us. We will only hold and use your Personal Information which we reasonably need to perform our duties in pursuance of any agreement we may have with you, consider or respond to interaction by you or fulfil our regulatory or other business obligations.

5.2 Any information you submit on the Website (including through your Account) will be used to provide our Services to you including to:

5.2.1 connect you with our Service Partners and the Financial Institutions that may require your Personal Information;

5.2.2 respond to your questions and requests;

5.2.3 inform you about the Services requested by you or notify you of any changes in service offerings;

5.2.4 communicate with you about your activities on and use of the Website;

5.2.5 request ratings or reviews;

5.2.6 improve the Website;

5.2.7 for internal business purposes; and

5.2.8 provided that you have consented thereto, provide you with information about services we feel may interest you by means of any form of electronic communication, including automated calling machines, facsimile, SMS or email. If you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about similar

services. If you are a new client, we will contact you once to obtain your consent by electronic means.

5.3 We will also provide information about you to our Service Partners necessary to perform the Services you have requested. In addition, our Service Partners may not use or disclose Personal Information for any purpose other than providing services to you.

5.4 When you create an Account (and agree to the Terms and Conditions and Privacy Policy), we may also, from time to time, use your Personal Information, provided that you have consented thereto, to contact you regarding promotions or special offers that we may run, and you will also be eligible to receive our newsletters, when available. If you prefer not to receive these special offers or the newsletter, you may click on the unsubscribe link in the email or change your Account notification settings, as that feature becomes available. If you unsubscribe from promotional communications, you may still receive communications regarding your Services and your Account.

6 Sharing information

6.1 Except as provided in this Privacy Policy, we will not provide any of your Personal Information to any third parties without your specific consent. We may share non-personal information, such as aggregate user statistics, demographic information, and usage information with third parties.

6.2 In order to carry out your requests, to make various features, services and materials available to you through the Website, and to respond to your inquiries, we may share your Personal Information with third parties that perform functions on our behalf, such as companies or individuals that provide customer service and the Service Partners who will be working on your Services.

6.3 While on our Website, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your information with a third party. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third party and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party.

6.4 We may share your Personal Information with other entities and affiliates under common control with BetterLife for internal reasons, primarily for business and operational purposes.

6.5 As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to the Websites, Personal Information, and any other information that we have collected about you of the Websites may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any insolvency or reorganisation proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

6.6 We may transfer and disclose information, including your Personal Information and device identifier, (including IP address), to third parties to comply with a legal obligation: when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms and Conditions, this Privacy Policy, or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our Website or the public.

6.7 To the extent that we will share your Personal Information for the purposes as set out in paragraph 5.6 above, we will ensure that all such third parties, who work on behalf of BetterLife, agree to only use your Personal Information subject to the provisions of this Privacy Policy and only for the purpose to provide the services contracted to us.

7 Your choice and access

- 7.1 You may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters or promotional e-mails by sending us an e-mail at privacy@betterlife.co.za or by contacting us by mail. Your opt-out request will be processed within 30 (thirty) days of the date on which we receive it. Of course, we will continue to have the right to email you concerning any matters pertaining to any Services or your Account.
- 7.2 If you wish to verify, correct, or update any of your Personal Information collected through the Website, you may edit your profile preferences (when this service becomes available) or contact us at the above address or e-mail. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Website. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information.
- 7.3 In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.
- 7.4 We may also send you text message communications to your mobile device relating to your Services, your Account, and/or related promotional messages. If you would no longer like to receive such communications via text message, you may text STOP to the number provided in the text message. We will send a text message confirming your opt out request.

8 Children

- 8.1 For the purposes of this Privacy Policy a "child" means a natural person under the age of 18 (eighteen) years who is not legally competent, without assistance of a "competent person" (being any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child).
- 8.2 We will not knowingly collect or process Personal Information concerning a child unless prior consent has been obtained from a competent person. If we determine upon collection that a user is a child, we will not use or maintain his/her Personal Information without the consent of a competent person.
- 8.3 If we become aware that we have unknowingly collected personally identifiable information from a child, we will make reasonable efforts to delete such information from our records. However, in certain circumstances, we may maintain and use such information (in accordance with the rest of this Privacy Policy and applicable law) in order to notify and obtain consent from guardian competent person and for certain safety, security, liability and other purposes permitted under applicable law.
- 8.4 A competent person may withdraw their consent at any time and request deletion of a child's Personal Information from our systems. If such a request is received, we will immediately remove any of the child's content from public view, delete all copies of the child's content, and refuse the child further access to the Website. A competent person may also request to review any Personal Information held by us pertaining to their child and may request deletion of such information.
- 8.5 To withdraw consent to the processing of personal information concerning a child, in relation to which you are a competent person, you are to make a request for the deletion of Personal Information, or request a review of Personal Information held by us by contacting us at privacy@betterlife.co.za

9 Transfer of information

- 9.1 There is a possibility that the personal information that we collect from you may have to be transferred to, and stored at, a destination outside of the Republic of South Africa.

- 9.2 Insofar as your Personal Information may be transferred outside of the Republic of South Africa, we shall take reasonable organisational and/or contractual measures to ensure that your Personal Information is processed by such third parties for the purposes for which it has been provided to us and that the required levels of protection have been implemented by such third parties to safeguard your Personal Information. To the extent that we do transfer your Personal Information outside of the Republic of South Africa, we will ensure that such third party/ies comply with the provisions of this Privacy Policy.
- 9.3 By using the Website and submitting your Personal Information to us, you consent to your Personal Information being transferred outside of South Africa.

10 Security of your information

- 10.1 We will take appropriate, reasonable, technical and organisational measures to safeguard your Personal Information in order to prevent loss of, damage to or unauthorised destruction of your Personal Information or unlawful access to or processing of your Personal Information, however, no electronic data transmission or storage of information can be guaranteed to be 100% secure.
- 10.2 BetterLife takes security and privacy of your Personal Information seriously and we will take all reasonable steps to ensure that all employees, agents and/or third party Service Partners having access to your Personal Information are bound by appropriate confidentiality and non-use obligations in relation to your Personal Information.

11 Payment information

We do not store the payment information that you provide to us (the "Payment Information") other than that information which may be used to facilitate your retrieval of that information, including, for example, the name you use to save the information under or the last four digits of your credit card. The Payment Information is stored with a third party payment Service Provider.

12 Password and user name

- 12.1 It is your responsibility to choose a password and to keep it safe. You agree and warrant that your username and password shall (i) be used for personal use only; and (ii) not be disclosed by you to any third party.
- 12.2 For security purposes you agree to enter the correct username and password whenever accessing your account on the Website, failing which you will be denied access.
- 12.3 You agree that you will be granted access to the Website once the correct username and password have been entered, irrespective of whether the use of the username and password is unauthorised or fraudulent. We cannot be held responsible for Personal Information being compromised due to a non-secure, disclosed or stolen password.
- 12.4 You agree to notify us immediately upon becoming aware of or reasonably suspecting any unauthorised access to or use of your username and password and to take steps to mitigate any resultant loss or harm.

13 Third party websites

The Website may contain links to other websites or apps that we do not own or operate. This includes links to our Service Partners and their websites. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other websites may send their own "cookies" to your device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any Website which appears or claims that it is one of our sites.

14 Social media

- 14.1 If you share our Website on any social media (such as Facebook or Twitter) your Personal Information (such as your name and the fact that you are interested in or visited our Website) may be visible to all the visitors of your personal webpage on Facebook and/or Twitter.
- 14.2 When you use social media websites, the terms and conditions (including the privacy policy/ies) of such social media website/s will apply to you. We are not responsible for the processing of Personal Information or the privacy policy/-ies of such social media website/s. This Privacy Policy is therefore not applicable to such social media website/s.
- 14.3 If you disclose your Personal Information to a third party such as Facebook or Twitter, we will not be liable for any loss or damage, howsoever arising (whether direct, indirect or consequential), suffered by you as a result of the disclosure of your Personal Information to such third parties. This is because we do not regulate or control how such third parties use your Personal Information. You should always ensure that you read and understand the privacy policies of such third parties / social media website/s.

15 Our commitment

- 15.1 BetterLife will-
- 15.1.1 treat your Personal Information as strictly confidential;
- 15.1.2 take certain technical and organisational measures to protect your Personal Information;
- 15.1.3 provide you with reasonable access to your Personal Information to view and/or update personal details;
- 15.1.4 as soon as reasonably possible after the discovery of a compromise, and insofar as we can establish your identity, notify you that there are reasonable grounds to believe that your Personal Information has been accessed or acquired by an unauthorised person; and
- 15.1.5 upon your reasonable written request, return or destroy any and all of your Personal Information which may be in our possession or control.
- 15.2 Whilst we will do all things reasonably necessary to protect your Personal Information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your Personal Information, either by employees and/or made by any third parties (including third party Service Partners) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.
- 15.3 If you disclose your Personal Information to any third party (including an entity which operates a website linked to our Website(s)), we shall not be liable for any loss or damage, howsoever arising, suffered by you as a result of the disclosure of your Personal Information to such third parties. This is because we do not regulate or control how third parties use your Personal Information. You should always ensure that you read the privacy policy of any third party that you disclose your personal information to.

16 Changes

Please note, we may change information on the Website and/or this Privacy Policy, at any time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy on the Website. However, if the revised policy materially changes the way in which we will use your Personal Information, we will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the revised policy.

17 **Contact us**

You are welcome to address questions, comments and/or requests regarding this Privacy Policy, including requests for access to your Personal Information and/or withdrawal of consent to use your Personal Information to us by contacting us at **privacy@betterlife.co.za**

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