



Sperosens Statement

PERSONAL INFORMATION, PRIVACY AND DATA PROTECTION

October 2022

ORGANISATION	Sperosens
SCOPE OF POLICY	This statement applies to the business of Sperosens wherever it is conducted, but based at the registered office. It applies to paid employees.
OPERATIONAL DATE	03/10/2022
PREPARED BY	Marihette Hattingh, Marketing and Customer Care
DATE APPROVED BY INFORMATION OFFICER	03/10/2022
APPROVED BY	[Name & Signature]
NEXT REVIEW DATE	July 2021

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1 INTRODUCTION

The responsibility that Spero International Proprietary Limited and its subsidiaries (“Spero” or “the Group” or “we” or “us”) undertakes to protect your privacy, is paramount.

We are committed to protecting your privacy and ensuring that your personal information is collected, processed and used responsibly and lawfully, with the required confidentiality and transparency.

This Statement covers:

- Spero’s Data Protection Values
- What Personal Information Spero collects from you
- Informs you about our use of Cookies
- How we use your Personal Information and who we may share that with
- How we protect your personal information
- Your rights of accessing your personal information from us
- The retention of your personal information
- How to communicate with us, whether that may be a compliment, complaint or simply raising a question.

2 PURPOSE

This Group Statement explains how we collect, use and manage your personal information in the context of applicable data protection laws. We have a Privacy Policy which sets out how we manage privacy in our company given current technology. We are constantly updating our systems, processes and technology to ensure optimal data protection. You are welcome to request more information about the Policy.

3 OUR DATA PROTECTION VALUES

We adhere to certain over-arching values when collecting, using or sharing your personal information. These values impact on and guide us in terms of how we engage with you and how we collect, use, protect and manage your personal information. These values are premised on:

3.1 TRUST.

We acknowledge and value the trust you place in us by providing your personal information. We will always strive to use your personal information in a way that is fair and worthy of that trust.

3.2 TRANSPARENT.

We will always be transparent with you about what information we collect, what we do with it, and who we share it with.

3.3 COLLABORATION.

We are committed to engaging with you promptly and constructively to resolve any query or concern which you may have on how we use your information.

3.4 PROTECTION.

We will take all reasonable steps to protect your information from misuse and to keep the information secure.

3.5 COMPLIANCE.

We shall do all things necessary to comply with applicable data protection laws and regulations and will co-operate with data protection authorities and regulators.

4 WHAT INFORMATION WE COLLECT

We shall collect and process your personal information relevant and necessary to provide you with access to our products and services.

To do this, we either enter into an agreement with you, or accept a mandate from you, thereby authorising us to provide these services to you and/or on your behalf in relation to us or third parties. In addition, we may collect and process your personal information to help us improve our offerings to you and for other lawful purposes associated with our business operations.

The specific type of information we collect will depend on the purpose for which it is collected and used. When you contact us, enter into an agreement with us or provide us with a mandate to represent you, we will collect only the information that we need to provide you with the products and/or services that we offer.

We do not currently collect information about your experiences over time as you use our website. The need for this will be considered in due course. The standard/usual information is given to your browser by our web server when you visit our website.

5 COOKIES

When you use our website, we gather standard internet visitor usage information. This is done through cookies and similar tools.

Cookies help websites remember information about your device and information on how you use the website. Whilst this information is not currently used, in due course we might use this information to monitor the areas of the website that are used most frequently and use this knowledge for future website enhancements and to display more focused advertising to a user by way of third-party tools.

This information is anonymised, pooled information, and individual behavior or patterns cannot be identified. If you do not wish for us to collect this information, your browser will normally allow you to disable cookies.

6 USE OF YOUR PERSONAL INFORMATION

We will collect and process your personal information only for the purposes for which it was collected and as agreed, for example:

- to maintain our relationship with you
- to conduct credit reference searches or verification with third parties
- to confirm and verify your identity or to verify that you are an authorised user for security purposes
- for the detection and prevention of fraud, crime, money laundering or other malpractice
- to conduct market or customer satisfaction research and for statistical analysis
- for audit and record-keeping purposes
- to liaise with third-parties to offer services to you that form part of the products you have with us
- in connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes.

If you inform Spero that you do not want us to continue using your personal information, we will stop doing so as far as that is practically possible.

7 WHO WE SHARE YOUR INFORMATION WITH

From time to time, we may have to disclose your personal information to and share it with third-parties who are involved in the delivery of products or services, giving effect to the terms of our agreement.

We have agreements in place with the recipients to ensure that they also comply with applicable privacy and confidentiality laws. Spero conducts due diligence into all new and existing financial and related products and services offered by third parties on an ongoing basis.

We may legally disclose your personal information in circumstances where we have a duty or a right to disclose in terms of law or other industry codes, or where we believe it is necessary for pursuing our legitimate interests or that of a third-party to whom your personal information is supplied.

8 INFORMATION QUALITY AND SECURITY

We provide adequate protection to prevent unauthorized access and use of the personal information we store. We will, on an ongoing basis, continue to review our security controls and related processes and technology to ensure that your personal information is secure and used only in line with what is set out in this notice.

Where we interact with third parties and share personal information, we take reasonable steps to

impose appropriate security, privacy and confidentiality obligations on those recipients as processors of personal information. This is to ensure that personal information that we are responsible for, is kept secure and only processed lawfully.

The disclosure of personal information to third parties may involve the transfer of personal information to other countries. These countries may not have the same data protection laws as those that apply in your country. We have put in place contractual provisions with those recipients.

Before we contract with third parties in foreign jurisdictions, we ensure that the recipient is subject to an appropriate regulatory legislation and/or a binding agreement with Spero that provides for similar or better reasonable protection of your personal information than is provided for in this notice.

9 YOUR RIGHTS TO ACCESS AND CORRECTION OF INFORMATION

You have the right to request a copy of the personal information which we have on record for you. To do so, simply contact us at info@spero.co.za and specify the information you would like.

Before we provide you with your personal information, we will take reasonable steps to confirm your identity. Please note that such an access request may be subject to the payment of a legally allowable reasonable fee. You have the right to ask us to update or correct your personal information. We will take reasonable steps to confirm your identity before making any changes to the personal information we may hold about you.

10 RETENTION OF YOUR PERSONAL INFORMATION

You have the right to request that we erase or delete your personal information. However, this right is limited. The period for which we retain your personal information may be influenced by:

- any compliance requirement in terms of legislation
- the retention of personal information for scientific, historical or statistical purposes
- for the establishment, exercise or defense of legal claims

11 PRIVACY, COMPLAINTS, COMPLIMENTS AND COMMENTS

Whatever the situation – we value your feedback and engagement. Where you have any questions, comments or concerns about how we deal with your personal information, you may request that we:

- do not contact you in future
- provide you with a copy of the personal information which we hold about you
- correct, update, or pseudonymise your personal information in our records
- Propagate any alleged misuse of your personal information

12 HOW TO CONTACT US

If you have questions about this notice or need further information about our values and approach to your privacy, your personal information, and data protection, please contact us at info@spero.co.za.