



**South African Representative  
Office of AfrAsia Bank Limited  
("SAREPO")**

**WEBSITE PRIVACY POLICY**

## ABOUT THIS POLICY

- 1.1. This Policy describes how SAREPO Processes information we collect and/or receive from you.
- 1.2. SAREPO is a company, registered according to the laws of the Republic of South Africa; with its primary place of business at Ground Floor, Commerce Square, 39 Rivonia Road, Sandhurst, 2196, South Africa.
- 1.3. AfrAsia Bank Limited is a “**Responsible Party**”, but as it is represented by SAREPO in South Africa, we refer to SAREPO as the responsible party in this policy. This means that we are responsible for deciding how we hold and use Personal Information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Policy.
- 1.4. SAREPO may share your Personal Information in the course of a business transfer. Where all or a part of our business is merged, sold or reorganised, Personal Information about you may be shared with the successor entity. SAREPO will use reasonable measures to help ensure that any successor entity Processes Personal Information in accordance with this Policy.
- 1.5. This Policy applies to all Data Subjects who visit this Website and all Data Subjects of whom SAREPO Processes their Personal Information.

## 2. DEFINITIONS

- 2.1. For purposes of this Policy:
  - 2.1.1. “**Data Subject**” or “**You**” means any person to whom the specific Personal Information relates, as contemplated in POPIA;;
  - 2.1.2. “**IO**” means the Information Officer of SAREPO;
  - 2.1.3. “**Personal Information**” means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - 2.1.4. “**Policy**” or “**Privacy Policy**” means this Website Privacy Policy;

- 2.1.5. “**POPIA**” means the *Protection of Personal Information, 2013* and any regulations or codes of conduct promulgated thereunder;
- 2.1.6. “**Processing**” or “**Process**” means any activity that involves the use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
- 2.1.6.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
  - 2.1.6.2. dissemination by means of transmission, distribution or making available in any other form; or
  - 2.1.6.3. merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 2.1.7. “**SAREPO**”, “**Us**” or “**We**” means South African Representative Office of AfrAsia Bank Limited;
- 2.1.8. SAREPO is the South African representative office in terms of the Banks Act, 1990 of AfrAsia Ltd, the latter being the private body under PAIA and responsible party under POPIA
- 2.1.9. “**Special personal information**” means personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;
- 2.1.10. “**Social Media Platforms**” means platforms such as Facebook, LinkedIn, Twitter, Pinterest, YouTube, Instagram, WeChat, WhatsApp, TikTok, blogs and all other similar Social Media or communication platforms; and
- 2.1.11. “**Website**” means AfrAsia Bank Limited’s website :  
<https://www.afrasiabank.com/en>

### 3. INFORMATION WE COLLECT AND RECEIVE

In most circumstances, providing your Personal Information to us is voluntary. Sometimes, it may be mandatory to provide your Personal Information to us. If you fail to provide certain information when requested, we may not be able to perform the services you requested from us or we may be prevented from complying with our legal obligations.

We collect and receive information about you in the following ways:

#### 3.1. Information you give us

This includes any information that you provide to us directly:

- 3.1.1. when you sign-up to utilise our services;
- 3.1.2. by filling in forms on our websites, or those provided to you;
- 3.1.3. when you enter a competition, promotion or complete a survey;
- 3.1.4. by posting comments or content on our social media pages; or
- 3.1.5. when you contact us or we contact you and you provide information directly to us.

#### 3.2. Personal Information we collect

- 3.2.1. When you register to use our services, you will be required to provide us with the following information, including but not limited to, your:
  - 3.2.1.1. name and surname;
  - 3.2.1.2. contact number and email address;
  - 3.2.1.3. physical address;
  - 3.2.1.4. identity or passport number;
  - 3.2.1.5. date of birth;
  - 3.2.1.6. marital status;
  - 3.2.1.7. employment details & monthly income (if applicable)

- 3.2.1.8. tax number;
- 3.2.1.9. estimated turnover in proposed bank account;
- 3.2.1.10. various due diligence documents such as a passport copy, a bank reference letter and proof of physical address.

### **3.3. Information we collect or receive when you use our Website or Social Media platforms**

We collect information when you use Websites or Social Media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive the following information, including but not limited to:

- 3.3.1. log in information;
- 3.3.2. information we infer about you based on your interaction with products and services;
- 3.3.3. device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address); and
- 3.3.4. location information.

### **3.4. Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

### **3.5. Special Personal Information**

In limited circumstances, we may collect your Special Personal Information. When we Process your Special Personal Information we will ensure that we get your consent to do so.

## **4. HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

Subject any other provisions as contained in the Data Privacy Policy of AfrAsia Bank Limited, which may be consulted on the following link: <https://www.afrasiabank.com/en/afrasia-bank/privacy-policy>, we use the information we collect and receive for the following general purposes, which are non-exhaustive:

- 4.1. to provide you with information, products or services you request from us;
- 4.2. in order to refer you to an appropriate third-party service provider;
- 4.3. to communicate with you;
- 4.4. to provide you with support; and
- 4.5. to provide effective advertising (for example to be provide you with news, special offers and general information about other goods, services and events which we offer, that are similar to those that you have already hired or enquired about).

## 5. **HOW WE SHARE THE INFORMATION WE COLLECT AND RECEIVE**

The below provisions shall be subject to any other provisions of the Data Privacy Policy of AfrAsia Bank Limited, which may be consulted on the following link:  
<https://www.afrasiabank.com/en/afrasia-bank/privacy-policy>.

- 5.1. We do not sell your Personal Information to third parties for their marketing purposes.
- 5.2. We may share information with:
  - 5.2.1. our affiliates, in other words, other companies in our group;
  - 5.2.2. we may disclose your Personal Information to a limited number of our employees and third party service providers (other than those who we refer you to), who we assist you to interact with;
  - 5.2.3. our business partners. We may share non-personally identifiable information with select business partners;
  - 5.2.4. other parties in response to legal process or when necessary to conduct or protect our legal rights;
  - 5.2.5. our auditors for the purposes of conducting audits on the Bank's financial accounts and records;
  - 5.2.6. local tax authorities as well as the tax authorities of the country or countries in which an account holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information

- 5.2.7. companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you; and
- 5.2.8. third-parties where you provide consent. In some cases, third-parties (often advertisers) may wish to attain information about you in order to promote their products to you, or for whatever other reason. We may share information with third-parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what data would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your data; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

## 6. YOUR RIGHTS

The below provisions shall be subject to any other provisions of the Data Privacy Policy of AfrAsia Bank Limited, which may be consulted on the following link: <https://www.afrasiabank.com/en/afrasia-bank/privacy-policy>.

- 6.1. Your use of our Website or Social Media Platforms, followed by your submission of information to us, represents that you have consented to the Processing of your Personal Information as described in this Policy.
- 6.2. You have the right to withdraw your consent for that specific Processing at any time. To withdraw your consent, please contact- [dpo@afrasiabank.com](mailto:dpo@afrasiabank.com). Once we have received notification that you have withdrawn your consent, we will no longer Process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 6.3. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.
- 6.4. Our website use cookies. If you wish to reject our cookies, you can configure your browser to do so.

6.5. We want to make sure that any data we hold about you is up to date. So, if you think your Personal Information is inaccurate, you can ask us to correct or remove it.

## 7. **RETENTION OF DATA**

We will retain your Personal Information only for as long as is necessary for the purposes set out in this privacy policy or to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

## 8. **OUR COMMITMENT TO SECURITY**

The security of your data is important to us. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorised access or disclosure of your information. We will do our best to protect your Personal Information and we will use up to date technology that will help us to do this. We will at all times comply with our obligation under applicable law.

## 9. **TRANSFER OF DATA**

9.1. We are based in and operate from South Africa, but AfrAsia Bank Limited operates in Mauritius and consequently your Personal Information may additionally be Processed in accordance with the data processing laws applicable in Mauritius (including but not limited to the Data Protection Act 2017, as may be amended from time to time). Your information, including Personal Information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.

9.2. We might transfer your Personal Information to places outside of South Africa and store it there, where our suppliers might Process it. In such circumstances, your Personal Information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa or otherwise in compliance with applicable laws.

9.3. Your use of our Website, followed by your submission of information to us, represents your consent to such transfer.

9.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.



## 10. LINKS TO OTHER WEBSITES

Our Website or Social Media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects Personal Information.

## 11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting.

## 12. ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION

12.1. You may request details of Personal Information which we hold about you under the *Promotion of Access to Information Act, 2000* (“**PAIA**”). Fees to obtain a copy or a description of Personal Information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold Personal Information about you may be requested free of charge. If you would like to obtain a copy of your Personal Information held by SAREPO, please review our PAIA Manual located at <https://www.afrasiabank.com/en/afrasia-sa-representative-office>

12.2.

12.3. You may request the correction of Personal Information SAREPO holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, SAREPO may limit the products and services offered to you or elect not to open the account.

12.4. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the Processing of Personal Information held about you. If you wish to exercise this right, please contact us using the contact details set out below in clause 14.

12.5. You have a right to object on reasonable grounds to the Processing of your Personal Information where the Processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such Processing.

## 13. COMPLAINTS

13.1. Should you believe that SAREPO has utilised your Personal Information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.

13.2. If you are not satisfied with such Process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

**E-mail address:** complaints.IR@justice.gov.za

**Physical address** JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg, 2001

14. **IO CONTACT DETAILS**

If you have any comments or questions about this Statement or how we handle your Personal Information, please submit them in writing to the Information Officer at.

**E-mail address:** [dpo@afasiabank.com](mailto:dpo@afasiabank.com)