

GRINDROD BANK

PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act 4 of 2013 ('PoPIA').

Our privacy commitment to you:

- To protecting your personal information
- Explain how we use client information
- Advise you on the choices you have regarding the use of client information
- Collect, use and process client information respectfully and lawfully
- How we store information

This Notice sets out:

- Who we are
- What processing means
- What information we collect
- How we use your information
- Our aim to provide financial services
- To whom we disclose your information
- Transfer across borders
- How we safeguard your information
- Your rights to access and correct your personal information
- How long we keep your information
- Privacy notice updates
- How to contact the Bank
- Information Regulator contact details

REVISION RECORD

Revision No.	Date of Change	Author Name & Designation	Description of Change
0.1	February 2020	C. Porter (Chief Compliance Officer) and D. Pillay (Deputy Information Officer)	Compiled
0.2	March 2020	N. Naidoo (Information Officer)	Reviewed & Updated
0.3	May 2020	D. Pillay (Deputy Information Officer) and N. Naidoo (Information Officer)	Finalised
0.4	June 2020	T. Dala (Legal Advisor)	Reviewed
0.5	June 2020	N. Naidoo (Information Officer)	Updated
	June 2020	POPIA Steering Group	Endorsed
	August 2020	Executive Committee	Endorsed

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	August 2020	Audit and Compliance Committee	Endorsed
	August 2020	Risk and Capital Committee	Endorsed
1.0	August 2020	Board	Approved

DEFINITION OF TERMS

Term	Description
Child	Act No 38 of 2005 (Children’s Act of South Africa), “Child means a person under the age of 18 years”.
Data Subject	Person to whom the personal information relates. Referred to in this Notice as “you” and “your”.
Information Officer	Conduct duties outlined in Section 55 of PoPIA. Responsible for ensuring that the organisation complies with the requirements of PoPIA.
Internet cookies	Files that contain small pieces of data that are exchanged between a user’s computer and a web server to identify specific users and improve their browsing experience.
Internet Protocol (“IP”)	A standard set of rules for sending and receiving data over the Internet.
Promotion of Access to Information Act (“PAIA”)	Act No. 2 of 2000, to give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights.
Personal Information	Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable existing juristic person.
Protection of Personal Information (“PoPIA”)	Act No. 4 of 2013, to promote the protection of personal information processed by public and private bodies and to introduce certain conditions so as to establish minimum requirements for the processing of personal information.
Prudential Authority	Established on 1 April 2018 to introduce the Twin Peaks approach to financial regulation. Twin Peaks has two main aims: firstly, to strengthen the safety, soundness and integrity of financial institutions and secondly, to better protect financial customers and ensure that they are treated fairly by financial institutions (market conduct).
Special Personal Information	Information concerning a child and personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, DNA, sexual life or criminal behaviour of a data subject.
Subsidiary	A business entity or corporation that is fully owned or partially controlled by another company that is termed as the parent or holding company.

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ABOUT US

In this Notice, 'the Bank', 'we' or 'us' refers to Grindrod Bank Limited and/or its subsidiaries. This Notice aims to inform you about how we collect, process and store your personal information securely during the course of our relationship with you. This Notice also sets out your rights and how you may protect and or utilise them.

THE INFORMATION WE COLLECT

We will process your personal information if you give us your consent or in accordance with the law. You give your consent to us through our product and services agreements. It is important to note that by using our services, products and service channels you agree that we may process your personal information as explained under this Notice. Sometimes you may provide us with consent to process your personal information, so it is important that you read this carefully. We collect and process your personal information to provide you with access to our services and products and for certain other purposes explained below. We will only collect information that we need for that purpose.

The type of information collected will depend on the purpose for which it was collected and used and can be made up, but not limited to the following:

- Personally, identifiable information (name, address, email address, contact details and personal identifier, e.g. national identity number, biometrics)
- Application information: information you provide to us on applications, including assets, income and debt
- Account information: information such as your credit card, ATM or cheque card number, investment account, bank account, loan or other
- Transaction information: information about transactions and account activity such as account balances, payment history, account usage including information about our communications with you, enquiries and responses
- Consumer report information: information from a consumer report, including a credit score and credit history
- Information from outside sources: information from outside sources other than consumer report information, such as information regarding employment (employer, occupation, place of work), credit and other relationships, including employment history, loan balances, credit card balances, property insurance coverage, data from public records, and other verifications by authorised persons or any information you elect to provide

Information will be collected directly from you when you become a client of the bank and use our services. This includes enquiries made by you or contacting us directly. It also includes information collected when you complete an application form, electronically contact us or use one of the services or facilities offered by us or any affiliate party. Where possible, we will inform you what information you are required to provide to us. We will not collect information in excess of what is required from you.

Information is also collected from other sources. With your consent, we may also obtain information that you provide to us with information we receive from other companies in the financial services group in order to offer you an efficient and consistent experience when you deal us.

We also collect website usage information using 'cookies' which permits us to collect internet visitor usage information. A cookie is a small text file that is saved on your Internet browser when you use our website. The cookie is sent to our computer each time you visit our website. The information we collect in this regard is limited to IP addresses only.

If you provide us with information about third parties (including relatives, beneficiaries and guardians), you agree to inform such third parties and obtain their consent to the processing of that information in accordance with this Notice.

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HOW WE USE YOUR PERSONAL INFORMATION

As mentioned previously, we will use your personal information only for the purpose for which it was collected or agreed with you. These include the following:

- Facilitate transactions
- Provide products and services
- Service, maintain or collect on accounts
- Allow for product applications and evaluate your eligibility for such product
- Conduct credit reference searches or verifications
- Conduct credit scoring and assessment, ongoing credit management,
- Perform risk management, including credit risk analysis
- Debt recovery purposes
- Establish and verify your identity (or your agent or representative) and to confirm that you are an authorised user for security purposes
- Detect, prevent and investigate fraud, crime or money-laundering
- Market or customer satisfaction research or for statistical analysis
- Auditing and record keeping purposes
- Comply with legal processes, to respond to requests from the public, regulatory authorities and allow us to pursue remedies and limit damages
- Comply with applicable laws, rules and regulations, including anti-terrorism, anti-money laundering and tax reporting
- Provide security for our clients and employees
- Respond to client requests

Your personal information will be used to comply with legal and regulatory requirements or industry codes to which we subscribe, or which are applicable to us. We may also use your personal information when it is permitted by law, for e.g. in order to protect our interests. We will store your personal information as is required by law.

HOW WE USE YOUR “SPECIAL” PERSONAL INFORMATION

We may process your special personal information in the following circumstances:

- If you have consented to the processing
- If the processing is needed to create, use or protect a right or obligation in law
- If the processing is for statistical or research purposes, and all legal conditions are met
- If the special personal information was made public by you
- If the processing is required by law
- If racial information is processed and the processing is required to identify you

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts. We process the personal information of children if the law permits this. We will only process the personal information of a child if any of the following applies:

- A person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child
- The processing is needed to create, use or protect a right or obligation in law, such as where the child is an heir in a will, a beneficiary of a trust, a beneficiary of an insurance policy or an insured person in terms of an insurance policy

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- The child's personal information was made public by the child, with the consent of a person who can sign legal agreements
- Where the child is an heir in a will, if required to give effect to the will
- Where the child is a beneficiary of a trust, if required to give effect to the trust deed
- Where the child is legally old enough to open a bank account without assistance from their parent or guardian
- Where the child is legally old enough to sign a document as a witness without assistance from their parent or guardian
- Where the child benefits from a bank account such as an investment or savings account

DISCLOSURE OF INFORMATION

Your personal information may be disclosed to our service providers who are involved in the delivery of services/products to you. We have agreements in place to ensure that they comply with the privacy responsibilities.

Your personal information may be shared with:

- Third parties for the purposes referred to above, (e.g. credit references, law enforcement agencies) or if it is necessary for the conclusion or performance of our agreement with you
- Other banks to prevent fraudulent activities
- Other companies in the financial services group to create an efficient experience for the client

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law
- Where we believe it is necessary to protect our rights
- In the public interest (assist in the prevention of crime)
- If you agreed that we may disclose your information

TRANSFER ACROSS BORDERS

There will be times when we will process your personal information in other countries for ordinary business purposes or to carry out your instructions. These countries may not have the same level of protection. We will only process your personal information with your consent. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles and practices. This will be included in the relevant contractual agreements.

INFORMATION SECURITY

Keeping client information secure is one of our most important responsibilities and is an obligation in terms of PoPIA. We maintain physical, technical, electronic and procedural/organisational safeguards and security measures to protect client information against unauthorised access and use. Our security controls and associated processes are reviewed on an ongoing basis to ensure that personal information is secure. Appropriate employees are authorised to access client information for legitimate and specified business purposes. Employees are bound by a code of ethics and other internal policies that require confidential treatment of client information. Disciplinary action can be taken if employees fail to follow such requirements.

Where we have contracted with third parties, appropriate security, privacy and confidentiality obligations are imposed to ensure that personal information for which we remain responsible is adequately protected.

We may need to transfer personal information to another country for storage or processing purposes. We will ensure that such transfer will be to a party who agrees to treat your information with the same level of protection as we are obliged to.

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We may use your information to send you information of new services or products that may be of interest to you and from time to time will mail, e-mail or SMS information to you about us. Regular non-encrypted email is not secure and for this reason we will not include confidential account information in an email response. Further, we will not request you to provide us with personal information such as your password or account number via email

YOUR RIGHTS

You have the right, free of charge, to request us to confirm whether or not we hold personal information about you . You have the right to request a copy of the personal information and request that such information be corrected or deleted if inaccurate, incomplete or excessive. You may also request that a record be deleted or destroyed if you believe we are no longer authorised to retain it. You can ensure your information is accurate by reviewing your account information (e.g. statement, correspondence) and advising us if it is incorrect. Some changes will only be made once the necessary supporting documentation has been obtained.

In certain circumstances, you also have the right to object, for legitimate purposes, the collection or processing of your client information. Objections can be made through registered post, electronic mail, facsimile or personal delivery . Once an objection is received, we may no longer process the personal information.

You have the right to query a decision that was made about a product or service that you have applied for and that was made solely by automated means. If you have any questions regarding your choices that are not addressed in this Privacy Notice, please contact us for more information.

Please note that we will take the necessary steps to confirm your identity before providing details of your requested personal information. Such requests may result in a legally permitted fee being charged.

We will assist you to the best of our ability if you require assistance to complete the relevant forms. (Per Regulations 2(2) and 3(2) outlined in PoPIA).

HOW LONG WE KEEP YOUR INFORMATION

We are obliged to keep your information if we require it for our lawful business purposes or if required by the law. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

CHANGE TO THIS NOTICE

Changes to this notice may be made from time to time. All changes will be published on the Bank website, please check this periodically.

HOW TO CONTACT US

Please use the following methods to contact us if you have any queries regarding this Notice or you believe that it has not been adhered to. Further, you may use these details if you wish to withdraw consent, access/ or correct your personal information, or request that a record of your personal information be deleted or destroyed.

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Physical address: 5 Arundel Close, Kingsmead Office Park, Kingsmead, Durban, 4001
Postal Address: PO Box 3211 Durban, 4000
Telephone: (031) 333 6600
Fax: (031) 571 0505
Email: info.officer@grindrodbank.co.za
Website: www.grindrodbank.co.za

To object to the processing of your personal information, to request a correction/deletion of your personal information or a deletion/destruction of a record, please send an email to: info.officer@grindrodbank.co.za

INFORMATION REGULATOR

You have the right to complain to the Information Regulator. The contact details for the Information Regulator is as follows:

Information Regulator
Telephone: (012) 406 4818
Fax: (086) 500 3351
Email: inforeg@justice.gov.za
Website: www.justice.gov.za/inforeg/docs.html

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