

Privacy Policy

Welcome to NRB's Privacy Policy

This Privacy Policy ("Policy") sets out the basis on which NRB collects, uses and shares the data that we receive from users of our websites. We take the privacy of our clients seriously, and we recommend that you read this Policy carefully. By using NRB's website at www.nrb.co.za, associated websites and applications, you agree to be bound by this Policy.

Please note that by using our Websites (as a user browsing the Websites or as a registered user on the portal), you are consenting to our collection and use of your information as more fully set out in this Policy. If you have any concerns about the use of your information, or the contents of this Policy, please feel free to contact us at Johannesburg@nrbrisk.co.za.

Data collected

We distinguish in this Policy between 'personal data' (for example your, or a 3rd parties contact details, identity number, or other information that can be used to identify you or attributed to you), and 'non-personal data' (for example data regarding usage of the Websites, and de-identified information extracted from the Websites for analysis). We collect both personal and non-personal data through our Websites or by your providing this information to us during registration and handover submission.

i. User Notifications:

Failure to provide certain information may make it difficult or impossible for you to access certain services through the Website.

You will need to ensure that your personal information submitted to us is accurate and up-to-date.

You are responsible for any third-party information obtained, published or shared through the Websites, and you consent to only use or share this third-party data with the third party's consent. You are also responsible for ensuring the accuracy of all information submitted to the Websites.

ii. Personal Data:

We collect and store the personal information that you may provide to us through our Websites when you submit a handover, register, update or change your information with us. This personal data may only be a name and email address, but may also be an identity number, telephone number, address, education level, and other personal information capable of identifying a 3rd party.

iii. Non-personal Data:

In addition to personal data (which is treated as confidential and protected from misuse), we also store non-personal data, which cannot be used to identify our users. The kinds of non-personal data that we collect includes de-identified data about usage of our Website.

Use of Non-Personal Data

Non-personal data issued for purposes involving product improvement, internal reporting, learning analytics, performing statistical analyses of collective behaviour of our users, measuring demographics and interests, and for other legitimate business purposes. We will take all steps to de-identify all information that is stored and analysed as non-personal data.

Use of Personal Data

Except as set out in this Policy or specifically agreed by you NRB will not disclose your personal data that we receive through the Websites. In general, we will always aim to de-identify the information that is stored (as non-personal information).

Examples of use of personal data are described in further detail below:

- Verifying account holder identity.
- Contacting you for the purpose of other legitimate business purposes, and all communications with you for these purposes will be kept on record.
- For analytics purposes (and product improvement more generally), including:
 - providing process enhancing analytical information to all relevant personnel who are involved in assisting debtors in payment of and clients in recovery of debt
 - using analytical information to define key indicators to predict recovery success and design appropriate positive interventions, and analyse whether the tools in the website are adding to the recovery process
 - reporting internally and other legitimate business processes
 - Researching, developing and improving, as well as training.
 - For disclosure:
 - to personnel within NRB and our Franchises for legitimate business purposes, including but not limited to internally used software and systems providers, and courier companies for shipping of notices (as far as reasonably necessary);

- to government authorities in response to court orders, subpoenas or other legal processes, to establish or exercise a legal right, defend a claim, or as otherwise required by law;
- to investigate, prevent or take action in relation to any suspected illegal activities, or to protect our own rights and the rights of the users, clients and debtors;
- to acquirers, assignees or other successor entities in connection with a sale, merger or reorganisation of all or substantially all of our equity, business or assets;
- For any other purpose:
 - for which we receive your consent
 - that is in the public interest
 - within the bounds of the laws of the South Africa

We may also disclose all your personal data between our associated NRB franchise companies and subsidiaries, who shall have all the same rights as us in relation to such personal data, and shall comply with this Policy in the processing of such information.

Information Security

i. Methods of processing

We undertake to process personal data in a reasonable manner and take appropriate, reasonable security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of your personal data. All data processing shall be carried out by employees using computers and/or IT enabled tools, following standard organizational procedures and modes.

In some cases, personal and non-personal data may be accessible to certain types of persons involved with the operation of the Websites (administration, sales, marketing, finance, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, by us as data processors.

ii. Place

All data collected through our Websites is managed and processed primarily at our head office and various operating offices, and in any other place where the parties involved with the processing are located.

iii. Retention time

All Personal Data will only be kept for the time necessary considering the purpose for which it was collected or to provide the service requested by users.

All non-personal data and de-personalised data will be retained for as long as it is useful and necessary, in light of the fact that the maintenance of this data would not be prejudicial to individual users in the event of a security breach.

Additional Information

i. Legal action

Your personal data may be used for legal purposes as reasonably determined by us, in court or in the stages leading to possible legal action. You also acknowledge that we may be required to reveal your personal data upon request of public authorities.

ii. Additional information about Personal Data

In addition to the information contained in this Policy, we may provide you with additional and contextual information concerning particular services or the collection and processing of personal data on request.

iii. System Logs and Maintenance

For operation and maintenance purposes, our Websites and any third-party services may collect files that record interaction with the Websites (System Logs) or use for this purpose other personal data (such as IP Address).

iv. Changes to this Policy

We review our privacy practices from time to time, and reserve the right to make changes to this Policy at any time.

If you object to any changes to the Policy, you must cease using the Websites and can request that we delete your personal data.

Date of most recent amendment: 25th June 2017