

Afiswitch Privacy Notice

1. Background

Afiswitch (Pty) Ltd is a private company with Registration Number 2001/023465/07 providing commercial fingerprint clearances on behalf of the South African Police Service (SAPS).

2. Privacy Commitment

Afiswitch is committed to ensuring that your personal information is processed in accordance with applicable Data Processing Legislation. Afiswitch will take all reasonable measures, through the implementation of appropriate policies, procedures, technology and controls to ensure that your personal information is appropriately secured and protected and processed only for lawful purposes.

3. Information Collection

- 3.1 In some instances, when engaging directly with you, Afiswitch acts as a Responsible Party in terms the Protection of Personal Information Act (“**POPIA**”) or a Data Controller in terms of the General Data Protection Regulations (“**GDPR**”). In all other instances Afiswitch may be regarded as a Data Processor or Operator. Afiswitch collects your personal information when you apply with Afiswitch for any service or product provided by Afiswitch.
- 3.2 Afiswitch may receive the following information about you from yourself or an entity that you may have provided consent to, or an entity that is lawful authorized to access your information or who may lawfully share your information with Afiswitch.

Individual

- Identity or Passport number
- Name details
- Contact information
- Race
- Gender
- Biometric Information
- Other lawful information that you may have consented to

Juristic

- Registration Number
- Name details
- Contact information
- Financial Information
- Trade References
- Number of Employees
- Personal details of Directors
- Other lawful information that the Juristic has consented to

3.3 Afiswitch may make use of cookies, which may be placed on your computer when you both visit and or register on any Afiswitch website or product site. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser.

3.3.1 Afiswitch cookies may be used for the following purposes:

- To enable certain features and functions on websites, e.g. remembering user-id, favourite channel selections, browsing and other service preferences;
- To build up a profile of how users experience the website;
- To improve the efficiency of Afiswitch's website;
- To administer services to users and advertisers; and
- To establish usage statistics.

3.3.2 Most internet browsers provide users with the option of turning off the processing of cookies (please see the "help" section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.

3.3.3 Advertisements on the Afiswitch website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. Afiswitch does not control these third parties and their cookie policies and therefore is not responsible for the Personal Information policies (including Personal Information protection and cookies), content or security of any third-party websites linked to the Website.

3.4 Afiswitch may also collect information that your browser sends whenever you visit Afiswitch websites. This information may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, and the pages of the Afiswitch website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

4. Information Use and Disclosure

4.1 Use and Disclosure as per Consent provided

4.1.1 In terms of the Consent provided Afiswitch can use your personal information to process fingerprint verification services as requested by you.

4.1.2 Afiswitch will adhere to processing obligations embodied in POPIA and GDPR

4.1.3 Afiswitch may update your information with the personal information you provide or which is provided

4.1.4 Afiswitch may use the information you provide to maintain contact with you in terms of

- Any queries that you may have lodged with Afiswitch
- Keeping you informed about new developments on or any changes to the services you may have accessed.

4.1.5 Afiswitch may process your information as may be allowed in terms of POPIA.

4.1.6 Afiswitch may process your personal information for the provision of marketing services when requested to do so by third parties to whom you have provided consent to.

4.2 Afiswitch may use cookies to identify you when you access a Afiswitch website and to build up a demographic profile of its users.

4.3 Afiswitch may use your Personal Information

4.3.1 to contact you with newsletters, marketing or promotional materials and other information or

- 4.3.2 to conduct market research and surveys to enable Afiswitch to understand and determine customer location, preferences and demographics in order to develop special offers and marketing programmes, and to improve our service delivery and customer experience;
 - 4.3.3 to provide additional products, services and benefits to users, which include promotions, loyalty and reward programmes from Afiswitch;
 - 4.3.4 to match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services;
 - 4.3.5 To administer contests, competitions and marketing campaigns, and personalize user experience;
 - 4.3.6 To communicate advertisements involving details of Afiswitch's products and services, special offers and rewards, either to general customers, or to communicate advertisements which Afiswitch has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling and telemarketing);
- 4.4 In relation to particular products and services or user interactions, Afiswitch may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- 4.5 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication from Afiswitch. Users may contact Afiswitch Information Officer: informationofficer@afiswitch.com to request the withdrawal.
- 4.6 Once Afiswitch receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) business days for the withdrawal to be effected. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. It may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, Afiswitch may still contact users for other purposes in relation to the products and services accessed by users or subscriptions to Afiswitch.

5. Cross Border transfer

- 5.1 Afiswitch may transfer your personal information to another country for storage and processing provided that the country has equivalent or better data protection laws in order to adequately protect your personal information.
- 5.2 Afiswitch shall transfer your personal information on a processing request originating from a Afiswitch Client located outside of the Republic of South Africa, should you have consented to such processing or if the processing is in accordance with relevant Data Processing legislation.

6. Information Retention

- 6.1 Afiswitch will retain your personal information in accordance with any retention legislation relating to such personal information.
- 6.2 Personal Information including but not limited to Biometric information will be retained with your consent for as long as you may require the use this information or the information is to be used for your benefit.
- 6.3 In the absence of any legislation governing a particular type of personal information, Afiswitch shall retain such information for a period of 30 (thirty) years unless (i) you have consented to a longer retention period or (ii) you request the deletion of such personal information, provided that there is no lawful reason for which such personal information must be retained by Afiswitch.
- 6.4 After 30 (thirty) years your personal information shall be de-identified and archived for audit and investigation purposes.

6.5 You may request the deletion of your personal information as per 7.2

7. Your rights in terms of your personal information use and disclosure

7.1 Right to access your personal information:

You may request, free of any charge, for Afiswitch to confirm if Afiswitch has personal information on you.

- To lodge a request to determine if your personal information is available at Afiswitch, you should email a completed **Form C Request for Access to Record of Private Body** [available on the Afiswitch Website] to informationofficer@afiswitch.com alternatively you may email Afiswitch at informationofficer@afiswitch.com, so that the Information Officer can send you the **Form C Request for Access to Record of Private Body** to complete.
- You will be required to provide proof of identity as may be determined by Afiswitch and to follow Afiswitch procedures related to the request.
- The Afiswitch Information Officer will direct the request, once received, to the relevant Afiswitch department to determine if there is any personal information on you.
- The Afiswitch Information Officer will require the relevant Afiswitch Department to communicate with you regarding the following
 - If a fee is payable, arrange with you as to the payment process.
 - The most secure method to provide the information to you.
- The process to execute the request may take up to 20 business days to complete.

7.2 Right to challenge and correct the accuracy of your personal information:

You may request, free of any charge, for Afiswitch to correct the accuracy of their Personal Information as held by Afiswitch or to delete this information if Afiswitch is no longer authorized to retain such information.

- To lodge a challenge to the accuracy of the Data Subject's personal information, you must e-mail a completed Personal Data Corrections form [available on the Afiswitch Website] to datacorrections@afiswitch.com alternatively you may e-mail Afiswitch at datacorrections@afiswitch.com so that Afiswitch Data Corrections Department can send you a Personal Data Corrections form to complete. When the Personal Data Corrections form is received by the Afiswitch Data Corrections Department, the Department shall:
 - Log the Personal Data Correction request
 - Investigate the request with the source of the Personal Information
 - Resolve the request in accordance with the response from the data source
- In the instance of a request for Deletion, such a request received by the Afiswitch Data Corrections Department will refer the request to the Afiswitch Information Officer for consideration, and will respond to the Data Subject on the outcome of the consideration.
- The request, once received, will be executed within 20 business days from the date received.

7.3 Right to object to processing of your personal information:

- You may object to the processing of your personal information by not completing a consent form when requested to do, except where the lawful purpose does not require consent.
- You may also withdraw your consent at any time prior to the processing of your information by informing the company to whom you have provided the consent that, you require that the company stop processing your information.
- You may object to the processing of your personal information by emailing informationofficer@afiswitch.com and using the subject: **Objection to Processing request**.
- You will be required to provide proof of identity as may be determined by Afiswitch and to follow Afiswitch procedures related to your request.
- You will accept that by withdrawing your consent that Afiswitch will not be able to process any services requested by you.

8. Security

- 8.1 The security of your Personal Information is important to Afiswitch.
- 8.2 Afiswitch Information Security Policies guides the processing of personal information and ensures that Afiswitch protects your personal information.
- 8.3 The personal information that Afiswitch collects and processes shall be secured by appropriate technical and organizational measures against accidental loss, destruction or damage, and against unauthorized or unlawful processing.
- 8.4 Afiswitch shall regularly evaluate and test the effectiveness of such measures to ensure that they are adequate and effective.
- 8.5 Afiswitch is responsible for ensuring the security of personal information processed throughout the performance of its duties.

9. Changes to this Privacy Notice

- 9.1 Afiswitch may update or change this Privacy Notice as often as required in order to adequately reflect the processing of personal information by Afiswitch.
- 9.2 You should check this Privacy Notice periodically to access the most recent Privacy Notice

10. Contact Us

If you have any questions about this Privacy Notice, please contact Afiswitch Information Officer: informationofficer@afiswitch.com