



# REVCO

Revenue Consulting (Pty) Ltd.

## PRIVACY POLICY

in terms of the

### PROTECTION OF PERSONAL INFORMATION ACT, NO 4 OF 2013 (RSA)

First Version:	Rob Kokott	03/2016
Second Version:	Rob Kokott	07/2017
3rd Version:	Rob Kokott	05/2021
4th Version:	Vusi Jennings	05/2024
This Version:	Vusi Jennings	06/2025

## SCOPE

The Privacy Policy applies to all Revco staff, sub-contractors and Joint Ventures.

## INTRODUCTION

Revenue Consulting (Pty) Ltd. (known as REVCO) is primarily a debt collection company functioning as an external debt collection entity for various clients which ranges from the public sector to the private sector. As a direct result of our services, all of Revenue Consulting (Pty) Ltd's employees will have access to personal information of our clients and their debtors. Revenue Consulting (Pty) Ltd. in dealing with this information, abides by the laws of the Republic of South Africa when interacting with this information and in doing so:

RECOGNIZES THAT—

- Section 14 of the Constitution of the Republic of South Africa, 1996, provides that everyone has the right to privacy;
- The right to privacy includes a right to protection against the unlawful collection, retention, dissemination and use of personal information;
- We must respect, protect, promote and fulfill the rights in the Bill of Rights;

AND BEARING IN MIND THAT—

- Consistent with the constitutional values of democracy and openness, the need for economic and social progress, within the framework of the information society, requires the removal of unnecessary impediments to the free flow of information, including personal information;

AND IN ORDER TO—

- Regulate, in harmony with international standards, the processing of personal information by public and private bodies in a manner that gives effect to the right to privacy subject to justifiable limitations that are aimed at protecting other rights and important interests,

In recognition of the above, the Privacy Policy aims at ensuring that all personal information that the company obtains through its services rendered and otherwise, are protected in terms of the laws of the Republic of South Africa and nationally and internationally accepted principles. The laws include:

- Protection of Personal Information Act No 4 of 2013;
- Promotion of Access to Information Act No 2 of 2000;
- Companies Act No. 7 of 2008;

The principles include:

- King III Code of Governance Principles;
- Generally Accepted Privacy Principles (GAPP)



## GOVERNANCE STRUCTURE

Revco's CEO, Vusumuzi Ivan Jennings is the responsible person and deputised COO, Sheldon Goodall to be the authorized person to implement these actions

## DEFINITIONS

### Personal Information:

Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

### Data Subject:

The person to whom personal information relates.

### Processing:

Means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information;



**Record:**

Means any recorded information –

- a) regardless of form or medium, including any of the following:
  - i. Writing on any material;
  - ii. Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
  - iii. Label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any means;
  - iv. Book, map, plan, graph, or drawing;
  - v. Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
- b) In the possession or under the control of a responsible party;
- c) Whether or not it was created by a responsible party; and
- d) Regardless of when it came into existence;

**PURPOSE OF THE POLICY**

The Privacy Policy aims to ensure that Revco fulfills its mandate whilst complying with the applicable protection of personal information legislation. The policy further ensures the protection of the Company and all our clients and their information against any unauthorized used.

This policy aims at protecting both the person whose personal information we received and our employees against any harm in dealing with personal information.

**POLICY STATEMENT**

In fulfilling our mandate, Revenue Consulting (Pty) Ltd will:

- Strive to comply both with applicable legislation and good practice.
- Recognizes and respects all individual and juristic person's rights.
- Be open and honest with individuals whose data is held.
- Provide training and support to all employees who have access to personal data to ensure they act with confidence and within the legal frameworks.
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**RETENTION AND RESTRICTION OF RECORDS**

- Revco allows for the archiving of information, based on timeframes defined in the information security policy. This can be electronic on backups or hard copies in storage facilities.
- All Records are stored for a maximum of 5 years based on the Income TAX ax, No 58 of 1962



- Information is restricted by way of User profiles, Passwords and encryption.

Revenue Consulting (Pty) Ltd. acknowledges the 8 conditions the POPI Act places upon us and this policy will clarify our approach to all 8 conditions. By following our approach to the 8 conditions we endeavour to minimize the key risks identified.

### **KEY RISKS IDENTIFIED**

Revenue Consulting (Pty) Ltd. assessed the information currently in our possession and have identified the following risks:

- 1) A large number of Revco's employees have access to personal information, either on our internal system or through mediums provided for by our clients. Therefore a breach of confidentiality is a possibility. (Deliberate or intentional)
- 2) Physical theft of company property. Information on the servers, desktop computers and laptops of employees.
- 3) Data is stored on servers on the property and well as the cloud environment, with access to the internet. Data exposed to cyber criminals.
- 4) Documentation acquired through debt collection processes will have sensitive personal information, if these documents are not dealt with in accordance with the right policy it may up landing in the wrong person's hand. (Use, store or destroy)
- 5) Employee personal information is kept due to legislative purposes and this confidentiality can be breached.

### **CONDITION 1 – ACCOUNTABILITY**

In the course of business, Revco will obtain most of the personal information as per the definition of personal information in the POPI Act.

Revco takes full responsibility and accountability for the possession, safekeeping and usage of this information and agrees to put in place all reasonably practicable policies to ensure the personal information is used only for its intended purposes, safeguarded from fraudulent activity and discarded in a safe and legal manner.

Revco will only store personal information for legal, historical or research purposes.

### **CONDITION 2 – PROCESSING LIMITATION**

Revco respects the privacy of the data subject and thus ensure that it will process the data lawfully. Revco will only process data in such a manner that it does not infringe the privacy of the data subject.

Revco will only process data where such data was obtained legally and is to be used for the purposes of conclusion or performance of a contract to which the data subject is party. Such a contract can be direct or indirect.

To ensure the data that Revco received is legally obtained, Revco will ensure its clients have provided the required consent.



Revco recognizes that a data subject may object to the processing of personal data. All objections can be raised in accordance with Section 11, subsection 1(d) to (f). If such an objection is legitimate, Revco will no longer process the personal information.

Revco will only process data collected directly from the data source or if it is not collected directly from the data source, data that was collected in order to maintain the legitimate interests of the responsible party or of a third party to whom the information was supplied legally.

#### **CONDITION 3 AND CONDITION 4 – PURPOSE SPECIFIC AND FURTHER PROCESSING LIMITATIONS**

Revco acknowledges that all the personal data received in the course of business was collected for a specific reason and that we will only use the data for its intended purpose.

After the data was used for its intended purpose the data will not be kept any longer than legally prescribed, unless it will be used strictly for historical, statistical data and research within Revco. All data that is kept by Revco will be protected through various IT and other physical safety mechanisms.

When keeping personal data, Revco will ensure that the further processing of the personal information is in accordance with legislation and compatible with the purpose for which it was collected in terms of a specific purpose.

#### **CONDITION 5 – QUALITY INFORMATION**

Revco will take all reasonable steps to ensure the personal information is complete, accurate, not misleading and updated where necessary. Revco will ensure updated data is used only for the originally intended use.

When Revco obtains updated data, we will ensure feedback is given to our clients. This is to ensure the quality of their data is also complete, accurate and up to date.

#### **CONDITION 6 – OPENNESS**

Revco will always be open with a data subject regarding the personal information we have in our possession. When a data subject requests information regarding personal information, we will provide the personal information as soon as practicable.

Further information can be requested through the steps as per our Section 51 PAIA Act Policy.

#### **CONDITION 7 – SECURITY SAFEGUARDS**

Revco is committed to the integrity, safeguarding and security of all our data which includes the personal information of our clients, obtained from clients and our own employees.

Revco will ensure that all reasonable technical and organizational measures are taken to prevent any loss of, damage to or unauthorized destruction of personal information and unlawful access to or processing of personal information.



Revco will run a risk analysis annually and through the various generally accepted information security policies and procedures, ensure all measures are in place to combat the risks identified.

All Revco employees are bound by the Debt Collectors Act and are thus well informed of the confidential nature of the personal information, further to this, Revco will ensure all employees are trained on the information of this policy and recurring training will take place annually.

As part of the training, Revco will conclude a written agreement, in which they will agree to the terms of the POPI Act, with all employees who is seen as operators of personal information.

If there is a breach of security safeguards, Revco will ensure the process as set out in Section 22 of the POPI Act is followed.

### **CONDITION 8 – DATA SUBJECT PARTICIPATION**

Revco acknowledges that the data subject can participate in the personal information that we have on record.

When a data subject provided adequate proof of identity, the data subject may request a record of the personal information we hold. We will in turn provide said record, free of charge and within reasonable time, to the data subject.

Revco commits to inform the data subject that they can request that the personal information should be updated and that we will abide by such a request as soon as practicable.

Revco will supply the updated personal information to our clients in order to ensure they have the client's corrected personal information.

### **CONCLUSION**

As a company, Revco relies on personal information in order to fulfill our mandate and duty towards our clients. As a result, we will always have personal information in our possession.

We will always strive to adhere to the right of privacy as far as possible and we will only use personal information for the purposes it was collected for. We will, as far as possible and practicable ensure the safety, security and integrity of such personal data and treat it with the utmost confidentiality.

The content of this Privacy Policy document is not intended to be a legal opinion regarding the application of the Protection of Personal Information Act and readers are urged to analyze the Act for themselves in order to make the required deductions.

This document, as well as the methods in which REVCO complies with the Protection of Personal Information Act, forms part of the intellectual property of REVCO and is therefore protected by copyright. Unauthorised copying or distribution hereof is prohibited.

