



▶ **Avo by Nedbank Privacy Notice**

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NEDBANK

Avo by Nedbank Privacy Notice

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Introduction

Avo by Nedbank treats its clients' confidential information with the utmost discretion. This is in accordance with the Constitution of the Republic of South Africa, 1996, which provides everyone with the right to privacy. The Protection of Personal Information Act, 4 of 2013 (POPIA), which operationalises the constitutional right to privacy, further strengthens our resolve to protect our clients' information.

POPIA promotes the fair and transparent use of personal information and requires us to safeguard it appropriately. Personal information, as defined by POPIA, is any information that can be used to identify you as an individual and, where applicable, a legal entity.

As part of our commitment to safeguard our clients' personal information and continue to comply with the law, our processing activities involving personal information are aligned to the provisions of POPIA.

We also process all personal information in line with the Code of Conduct for the banking industry. Following an application from the Banking Association South Africa (BASA), which represents banks (including us), the Information Regulator issued this code in terms of chapter 7 of POPIA. The code outlines and expands on the specific obligations that members of BASA (banks as responsible parties, operators, or joint responsible parties) have when processing their clients' personal information, and does not replace the provisions of POPIA.

This privacy notice sets out how your personal information will be used by Avo and applies to any information, including personal and special personal information, you give to Avo or which Avo may collect from third parties. The privacy notice applies to all users of our website and mobile application software, which are used to access and buy our products and services.

It is important that you read this privacy notice carefully before submitting any personal information to Avo.

By submitting your personal information to Avo, you consent to the processing of your personal information as set out in this privacy notice.

The provisions of this privacy notice are subject to mandatory, unalterable provisions of applicable laws.

Please do not submit any personal information to Avo if you do not agree to any of the provisions of this privacy notice. If you do not consent to the provisions of this privacy notice, or parts of the privacy notice, Avo may not be able to provide its products and services to you.

What is personal information?

Personal information is data that can be used to identify you. This includes information you share with us, information we gather during onboarding and our relationship with you as our client, and information about your marketing preferences. This information includes:

- your gender as may be required for statistical purposes or by law;
- your marital status, nationality or social origin;
- your age, physical or mental health and well-being, medical conditions, disability, religion, conscience, belief, culture and language;
- your education;
- your financial information (like your income and expenses, loan repayments, investments, assets or your financial needs);
- any identifying number or symbol (like account, identity or passport numbers);
- your email address, physical address or telephone number (as this may be needed for us to communicate with you);
- your location and online identifiers [this can be Internet Protocol (IP) addresses or geolocations];
- your employment history (this is specifically relevant when you apply for credit);
- biometric information (eg fingerprints and facial or voice recognition); and
- your personal opinions or views.

There may be circumstances in which we will collect your special personal information. This information can include:

- your race or ethnicity (as required by law and for statistical purposes);
- your health (e.g. when you apply for life insurance); and
- criminal behaviour where it relates to the alleged commission of any offence, any proceedings regarding any offence allegedly committed by you or the disposal of such proceedings.

The collection and processing of your special personal information will only happen with your consent, if this is necessary to establish, exercise or defend a right or obligation in law, to comply with a law, for historical, statistical or research purposes or if it is otherwise lawful to do so.

Aim and objective of this privacy notice

The aim is to give you and our stakeholders guidance and information on how we collect, use, and protect your personal information. The privacy notice will tell you:

- why we collect your personal information and how we may process it;
- how we share your information with third parties;
- how we protect your information;
- how long we hold onto your information; and
- of your rights.

Why we collect and process your personal information

For us to offer you products, services and any value-added service through our online platforms, we need to collect, use, share and store personal information about you so we can:

- identify you;
- verify your identity;
- create a user account for you;
- provide and make available suitable products and services to meet your needs;
- market relevant products and services to you;
- conduct market research and client satisfaction surveys;
- record and monitor any communications between you and us and use these recordings to verify your instructions to us to analyse, assess and improve our services to clients, and for training and quality purposes;
- communicate with you by post, phone, SMS, email and other electronic media; and
- enter into a contract with you.

It is your right to refuse to provide personal information, but this refusal can limit our ability to provide the required products and services to you. We will collect only information from you that is necessary and relevant to the service or product we have to provide.

We will collect and use your personal information only if we are lawfully permitted to do so. We may send you direct marketing, but you can unsubscribe by opting out via your preferred communication channel or instructing Avo directly.

If we use third-party data providers, we will ensure that they are lawfully allowed to share the information with us.

The lawful bases we rely on for processing this information are:

- we have your consent to do so;
- we have an obligation to carry out actions for the cancellation or performance of a contract with you;
- we are required by law to process your personal information;
- the processing protects your legitimate interest;
- we have a legitimate interest to pursue; and/or
- a third party has legitimate interest to pursue.

Processing the information of children

We recognise the importance of protecting the privacy of persons (minors) under the age of 18. We do not knowingly collect personal information from minors. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian can contact us, and we will delete the minor's profile.

How we collect your personal information

We collect your personal information in the following ways:

- Directly from you when you register to use our platform.
- Indirectly from you when you interact with us electronically. When you are browsing our website (including our mobile app), we may collect information from you, like your IP address and server logs.
- From other sources, such as public databases, data aggregators and third parties, as well as other financial institutions, credit bureaus, fraud prevention agencies or indirectly through your interactions with third parties.
- Through agents or third parties who collect information on our behalf.
- Through other entities in the Nedbank Group or divisions/clusters of entities within the Nedbank Group.

Third parties from which we may collect your personal information can include:

- law firms;
- other financial institutions and service providers;
- data brokers;
- business partners;
- insurance companies;
- credit bureaus;
- payment associations;
- social media;
- the South African Police Service;
- local or foreign regulators;
- public or government entities;
- South African Fraud Prevention Services;
- Payments Association of South Africa;
- media publications; and
- tracing agents.

whom we will disclose your information

Protecting our interests may sometimes require the disclosure of specific client information to third parties. Entities and third parties with whom we can share your information can include:

- banks and financial institutions;
- regulatory authorities;
- the regulator, industry bodies and the ombudsman;
- law firms and auditors;
- insurers;
- the South African Police Service;
- South African Fraud Prevention Services;
- Payments Association of South Africa; and
- other third parties as may be required either contractually, by law, or legitimate interest.

When sharing your information with recipients in other jurisdictions, we will ensure compliance with applicable laws.

We will not sell your information to third parties and will only market to you in compliance with applicable laws and your marketing preference, using, where practicable, the communication method you chose.

How we protect your information

We are committed to ensuring that your personal information is secure. To prevent unauthorised access or disclosure, we have put reasonable physical, electronic and managerial procedures in place to safeguard and secure the information we collect.

All online transacting sessions are encrypted and personal information is stored according to internationally accepted banking information security practices.

How long we will keep your information

We will keep your information only for as long as we need it for a lawful business purpose or as required by law (including Consumer Protection Act, tax legislation, National Credit Act etc) and any other statutory obligations (including anti-money-laundering and counter-terrorism requirements). We may keep your personal information for longer than required if you have agreed to this or we are lawfully allowed to do so.

If we need to keep your personal information for longer than required and, more specifically, for historical, statistical or research purposes, we will do so with the appropriate safeguards in place to prevent the records from being used for any other purpose.

Your information may be kept for varying periods from the end of our relationship, depending on regulatory requirements. We will take all reasonable steps to destroy or de-identify the personal information that we hold when it is no longer required.

Sending personal information outside of South Africa

We may transfer certain personal information outside the geographic borders of South Africa to service providers for the purposes set out above, including for data storage and back-up purposes to ensure the integrity of our systems, which the services we provide to you, are dependent on. When we do transfer your personal information outside of South Africa, we will ensure that this is done in accordance with the requirements for lawful transfer outside of South Africa as set out in POPIA.

Your data protection rights

You have the right to ask us to confirm whether we hold any information about you. You can also request a record from us about the personal information we hold about you, as well as information about all third parties with whom we have shared your personal information. Once we have given the information to you, you can ask that we:

- correct or delete the personal information in our possession or under our control if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been obtained unlawfully;
- destroy or delete a record of your personal information that we are no longer authorised to keep in terms of regulatory requirements; or
- stop or start sending you marketing messages by informing us in writing or through our branch network, call centres or website.

If you want to verify the information we have about you or want us to update, change or delete it, you can:

- refer to our Promotion of Access to Information Manual which is available at www.avo.africa;
- call the Avo Contact Centre on 0860 100 833; or
- chat within your app under help and support.

Complaints

You can submit complaints about the processing of your personal information by phoning the Avo Contact Centre on 0860 100 833 or sending an email to privacy@nedbank.co.za.

Or, if you are not satisfied with the way we have dealt with your complaints, you can contact the Information Regulator at POPIAComplaints.IR@justice.gov.za.

Our contact details

The contact details of the information and deputy information officers are:

Information Officer

Daleen Du Toit

Deputy Information Officer

Neelesh Mooljee

Physical address

135 Rivonia Road
Sandown
Sandton

Johannesburg

Postal address

PO Box 653640

Benmore Gardens

2196

Tel: +27 (0)11 294 7130

Email: privacy@nedbank.co.za

Website: nedbank.co.za

Cookies

We use cookies to personalise your repeat visits to our website by determining how you use the site. Cookies are very small text files that may be stored on your computer or mobile device when you visit a website, enable images or click on a link in an email.

We use cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to meet your needs. We use this information for statistical analysis purposes only and then the data is removed from the system.

Overall, they help us give you a better website by enabling us to monitor which pages you find useful and which not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept them, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

About us

Nedbank Group is incorporated in the Republic of South Africa and our registration number is 1966/010630/06. Our ordinary shares have been listed on JSE Limited (the JSE) since 1969 under the share code: NED and on the Namibian Stock Exchange since 2007 under the share code: NBK. Our ISIN is ZAE000004875.

We offer a wide range of wholesale and retail banking services, as well as a growing insurance, asset management and wealth management offering.

These services are offered via frontline clusters:

- Nedbank Corporate and Investment Banking
- Nedbank Retail and Business Banking
- Nedbank Wealth
- Nedbank Africa Regions

The Group's business partners include the following:

- Old Mutual Limited
- Ecobank
- Ecobank Nedbank Alliance
- Bank of China

Our presence

- Nedbank Group's primary market is South Africa, but we are continuing to expand into the rest of Africa.
- We have a presence in five countries in the Southern African Development Community (SADC) and East Africa region where we own subsidiaries and banks in Namibia, eSwatini, Mozambique, Lesotho, Zimbabwe, as well as representative offices in Angola and Kenya.
- In West and Central Africa, we follow a partnership approach and concluded the acquisition of an approximate 21% shareholding in Ecobank Transnational Incorporated (ETI) in 2014, enabling a unique one-bank experience to our clients across the largest banking network in Africa, comprising more than 2 000 branches in 39 countries.

Outside of Africa we have a presence in key global financial centres to provide international financial services for Africa-based multinational and high-net-worth clients. These include:

- Guernsey;
- Isle of Man;
- Jersey; and
- London.

We also have a representative office in Dubai.