



DATA DISCOVERY

Privacy Policy

Data Discovery (Pty) Ltd

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Privacy Policy

Data Discovery respects your privacy, and we take the protection & security of personal information seriously. The [purpose of our Privacy Policy](#) is to describe the way in which we process your personal information.

Introduction and purpose of the policy

Welcome to our privacy policy. We are Data Discovery (Registration number 2013/088455/07), and this policy details our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection and security of personal information very seriously and always do our best to comply with applicable data protection laws.

The purpose of this policy is to describe the way that we process, collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person. Through the provision of quality products and services, Data Discovery is necessarily involved in the processing, collection, use and disclosure of certain aspects of the personal information of clients, customers, employees, and other stakeholders. Given the importance of privacy, Data Discovery is committed to effectively managing personal information in accordance with POPIA's provisions.

This policy applies to you under [certain circumstances](#) and contains the most important and relevant points. The grey blocks in this policy summarise the content as far as possible, but we suggest that you follow the click-through links to view the policy in more detail.

Audience

This policy applies to you if you are:

- a data subject who has been contacted by us (Data Discovery, GetLoaded, or any other division of Data Discovery); or
- an existing member of our marketing database;
- a customer of ours; or
- a visitor to our website(s)

Our services necessitate the processing of personal information. We are committed to the secure and compliant handling of all personal information held and processed by Data Discovery and its employees. Data Discovery is a member of several industry governing bodies and adheres to each institution's guidelines and code of conduct. GetLoaded, an internal marketing division of Data Discovery, also adheres to these rules.

We care about your [rights as the consumer](#) and this policy details the communication channels and procedures you can follow to contact us if you wish to either [unsubscribe](#), have your information [updated](#) or [deleted](#), or if you want to send us a data subject [access request](#).

Your rights as data subject

You have various rights in managing the personal information we hold on you and may make various requests. While we will endeavour to honour these requests wherever possible, there may be circumstances in which the law allows or requires us to refuse a request. We will assess each request separately and notify you of our decision as soon as reasonably possible after receiving your request.

Right to object and/or unsubscribe

You may object to our processing of your personal information and unsubscribe for all future marketing campaigns and/or other services. This will prevent information associated with your ID number from being processed. Please contact us to request this using info@data-discovery.co.za with the subject line “Right to unsubscribe”. You can also opt-out when contacted by Data Discovery, GetLoaded or any other division of Data Discovery while promoting any of our clients’ products or services.

In order for us to properly opt-out all/some of your details from future campaigns, we need the following information: ID Number (or DOB at least), name, surname, cell phone number, home number, work number (or at least all the numbers you would like to opt-out with) and your email address. This enables us to match you to our database to unsubscribe you from our eligible leads.

If you do not want to be fully unsubscribed, you may choose certain products to be contacted for and opt-out for other products. For example, you might wish to be contacted for personal loans options, but do not want to be contacted for insurance products. You may also decide which channels to be contacted on and/or marketed to. For example: you might prefer being contacted by SMS/email, but do not want to be phoned by telemarketers. Please contact us to request this using info@data-discovery.co.za with the subject line “Partially unsubscribe” and provide the necessary details in your email.

Data Discovery will process your unsubscribe/subscription preferences as soon as all the necessary information (mentioned above) has been received and matched to our database. It is important to keep in mind that we also need to communicate your preferences to any of our affiliates/clients who might have your details for a specific campaign. The affiliate/client then also needs to remove/update your details on their systems which might take some time. Data Discovery will, however, always have your updated preferences active on our systems and will apply these for all campaigns going forward.

Right to rectification/correction

Our work involves the continual updating of data based on POPIA regulations to ensure accuracy. We rectify and update information based on recent data stored on the credit bureaus and updates communicated by prospects when contacting them. If you believe that we hold information about you which is incorrect you can contact us using info@data-discovery.co.za with the subject line “Rectification” and provide the necessary details in your email.

We are, however, not legally allowed to update any information held by a credit bureau. If there are any credit related data that you would like to dispute, please contact any of the credit bureaus who will provide assistance as to the process you should follow.

Right to deletion

You may request that we delete your data. Please note that if you make this request, we will have no means of avoiding calling you in the future should your data come into our business again as your data will then no longer be in any of our systems, including our “do not contact list”.

If you wish to be permanently excluded from being contacted, we recommend that you instead exercise your “Right to object and/or unsubscribe” (above). However, should you still wish to have your data deleted please contact us using info@data-discovery.co.za with the subject line “Right to deletion”.

In order for us to properly match and delete all of your details from our database, we need the following information: ID Number (or DOB at least), name, surname, cell phone number, home number, work number (or at least all the numbers you would like to have deleted) and your email address.

Access to information

You may ask for the data specific to you in the form of a Data Subject Access Request. We will require you to prove your identity in order to release any information. Please contact us to request access using info@data-discovery.co.za with the subject line “Access request”.

Your acceptance of this policy is required before requesting any of our services, or when registering on our GetLoaded website.

Acceptance

Acceptance required

If you register on our GetLoaded website (<https://getloaded.co.za/>) then your acceptance of the terms of this policy is required. If there is anything in this policy that you do not agree with, then we advise you not to make use of our services any longer. Where applicable, you may exercise any of your rights as mentioned in this policy.

Legal capacity

You may not register on our GetLoaded website, request our services, or send us an enquiry if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their explicit permission to do so.

Our obligations

We may use your personal information to fulfil our obligations to you.

Personal information

Due to the nature of our business, we store various types of personal information including, but not limited to, name and surname, contact details, address information, demographic information, etc.

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (on our GetLoaded website when applicable);
- certain information collected through our call centre through telemarketing efforts;
- certain information collected on submission of a query (when applicable); and
- optional information that you provide to us voluntarily;

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;

- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

We process information for various purposes such as pursuing lawful related marketing activities, providing various services to our clients, and keeping our data subject records up to date, amongst other reasons. We take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use and as necessary for the purposes defined in this policy.

Purpose for collection

We may use or process any information that you provide to us for the purposes that we agreed with you at, or as soon as reasonably possible after, collection. Processing includes gathering your personal information, disclosing/sharing it, and combining it with other personal information. We generally process personal information for various purposes, including:

- **products or services purposes** – such as collecting requests for and providing our products or services to our clients;
- **analytical purposes** – such as providing analytics and scorecard development services to our clients;
- **understanding purposes** – such as processing personal information to better understand our data subjects;
- **updating records purposes** – by maintaining accurate information by keeping our data subjects' records up-to-date;
- **employment purposes** – such as managing employees in general;
- **commercial purposes** – such as managing customer and supplier contracts and relationships;
- **debt collection purposes** – such as enforcing debts;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.
- **sharing purposes** – such as sharing your request (through our GetLoaded website) to connect you with third parties and to provide our services to you.

Keeping records accurate and up to date

We take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use and as necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on our GetLoaded website or through other sources.

If you wish to update information that we hold on you, you can also contact us using info@data-discovery.co.za with the subject line “Rectification”. Please also refer to the “Right to rectification” section (above). Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to or making any corrections to your personal information.

We collect information only under certain circumstances. We will obtain your consent in accordance with applicable law.

When do we collect information?

During registration on our GetLoaded website

Once you register on our GetLoaded website, you will no longer be anonymous to us. You will provide us with certain personal information when registering.

This personal information includes, but is not limited to, any of the fields listed below and/or information as listed in the “[Personal information](#)” section above:

- your name and surname;
- your ID number;
- your telephone number;
- gross monthly income;
- estimated expenses;
- your product interest(s);
- required loan amount;
- your consent provided;
- acceptance of the terms and conditions;
- opt-in consent (for sharing of your data with the service providers);
- opt-in consent (SMS and/or telephonically);
- credit check consent;

We will use this personal information to fulfil your request, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy. In certain circumstances, you will be asked to provide us with additional information as needed.

Through our internal call centre in the process of telemarketing efforts

As permitted by law, Data Discovery uses our acquired database for telemarketing efforts. Limited personal information is provided to our call centre agents (name, surname and contact number) to enable them to make the call. Personal information is then captured when either an opt-out (for the purposes of updating our do-not-contact list) or opt-in response is processed.

We monitor and record all telephone calls our call centre agents make for compliance and record keeping purposes.

Through queries when you contact us directly

Information collected when you contact us is used to respond and communicate with you, or to action specific requests. All information provided by you in the query is therefore automatically sent to our email address. We do our utmost to ensure that all reasonable steps are taken to safeguard your information.

We may monitor and record any telephone calls that you make to us directly unless you specifically request us not to.

Indirectly through browser & internet usage information (on either our GetLoaded or Data Discovery website)

We may use your website usage information to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the GetLoaded website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor, or share any of your personal information. We merely use them to compile anonymous information about our website.

Cookies

For more information on how we use cookies, please refer to our cookie policy on our websites (<https://getloaded.co.za/> or <http://www.data-discovery.co.za/>).

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

Consent to collection

We will obtain your consent to collect personal information in accordance with applicable law and/or when you provide us with any registration information or optional information.

We may use your information to send you administrative [messages](#) regarding the website and for marketing purposes, where lawful. We may use your information for [targeted content](#) in certain, specified instances.

Use**Targeted content**

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

Messages and updates

We may provide you with information about new products or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt-into them. We may send you one message asking you to opt-into promotional messages without you having opted-into promotional messages.

We take the **security** of personal information seriously and always do our best to comply with applicable data protection laws. We secure our data by maintaining reasonable measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration & destruction and have various security and operational measures in place.

Security

We secure personal information by maintaining reasonable measures to protect it from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Security measures include, but are not limited to:

- connections to servers through VPN;
- two-factor authentication; and
- strict access control to servers.

No personal information is stored on any personal/work laptops. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you **among other purposes**. We may also disclose personal information to third parties if required for legal reasons.

Disclosure

Sharing

We may share your personal information with:

- other divisions in our business so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested our services and if you have opted-in to marketing communications);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our service providers under contract who help provide certain products or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these service providers only use your information in connection with the products or services they supply or services they perform for us and not for their own benefit);
- our clients under contract who provide credit related services (after you have registered on our GetLoaded website to receive offers from third parties, or after you have opted-in to marketing through our call centre);
- our internal call centre agents who perform our telemarketing services (very limited data is provided to our call centre agents, e.g. name, surname and contact number);
- credit bureaus to keep our records up to date and accurate in accordance with section 16 (1)(2) of POPIA before processing personal information for the purposes set out in the **section** above;
- other third parties who provide us with relevant services where appropriate.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

Marketing and Business Intelligence purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

We will only retain your personal information for as long as is necessary and we do not send personal information outside of South Africa.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our disclosure rules as set out in this policy. We may retain your personal information in physical or electronic records at our discretion.

Cross-border transfers

We do not send personal information outside of South Africa. If we ever do, we will only transfer your personal information to other countries who have similar privacy laws to South Africa's, or to recipients who guarantee the protection of personal information to the same standards required by POPIA.

We may change the terms of this policy at any time by placing a notice in a prominent place on the website. Please feel free to contact us at any time.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website detailing the changes that we have made and indicating the date that they were last updated. If you continue to use any of our websites or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

If there is anything in this policy that you do not agree with, then we advise you not to make use of our services any longer. Where applicable, you may exercise any of your rights as mentioned in this policy.

Contacting us

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us using info@data-discovery.co.za with the subject line "General privacy policy enquiries".