

Privacy Policy

1. Introduction & Purpose

Dark Water is committed to business practices in compliance with the Protection of Personal Information Act and in line with acceptable industry standards.

This privacy policy explains how Dark Water may collect and use your personal information, including:

- How we will collect and use it
- When and with whom we will share it
- What your rights are and how you may complain

This policy applies to all personal information that we process. This includes but is not limited to the following:

- if you are a customer or potential customer of one of our services or related to that person;
- if you are a customer or potential customer of our client or related to that person;
- if you are part of one of our legitimate databases.

We may change the policy from time to time if the law or our business needs require it. The latest version will always be published on the websites.

Some information fields will be mandatory if you want to use a service.

Different privacy policies may apply to employee and supplier information.

2. Definitions

- “Act” means the Protection of Personal Information Act 4 of 2013
- “we” or “us” means Dark Water and its associates, which include:
 - Creditors Support Desk
- “Personal Information” includes any personal information as defined in the Protection of Personal Information Act
- “Website” means any or all Dark Water websites including:
 - www.darkwaterco.co.za
- “You” or “your” Refers to the user of the websites or user of any service or product made available through the websites, or any personal information we may be processing for legitimate business purposes.

3. Personal Information about Children and Special Personal Information

Dark Water will not intentionally collect information about children. If you are under the age of 18, you may not use this website or any services that we provide through the website without the knowledge and consent of your parent or guardian.

If you provide any information about children to us, you warrant that you are a competent person in terms of the Act and you agree that we may process the child's personal information in accordance with this policy.

If you provide any information to us that qualifies as "special personal information" in terms of the Act (these include for example information about health, race, trade union membership and criminal activity), you expressly agree that we may process the information in accordance with this policy.

4. Categories of Personal Information

Different categories of personal information will be processed, depending on the reason for processing. Generally speaking, we may process any or all of the following categories of personal information:

- General personal information and contact details like name, address, contact numbers, email address, age, employment etc.;
- Financial, payment, banking and account information;
- Demographic information;
- Credit bureau and fraud;
- Cookies and device information like browser settings, IP address, time of logging on etc.
- Advertising and online information like your interactions with websites and platforms where we advertise our products or services;
- Views and opinions;
- Consent records.

5. Collecting Personal Information

We will collect your personal information if:

- you register for any service that we provide;
- you provide any information to us online or through any other communication channel;
- you participate in any marketing campaigns by us or selected third parties;
- our Client provides your information to us.

We may collect personal information about you when you visit our website, mobile sites or any of our social media platform pages. This collection will happen automatically through the use of cookies (a cookie is a small piece of information stored by your browser, typically used to identify returning

visitors, and to collect aggregate information on the number of visitors to a site and the number of pages viewed, but you can set your browser to prevent this if you want to).

We may collect personal information from third parties where our legitimate business interests require and allow collection from a third party. These may for example include credit bureaus, data providers, tracing agencies, fraud prevention agencies and other business affiliates and with whom we have contractual relationships. We also collect information from the companies within the group.

We may collect information from social media and public sources.

6. Using Your Personal Information

We will use your personal information for our legitimate business purposes or for reasons where we obtained your consent to use it or you required us to use it. The reason for processing will depend on which company within the group processes the information.

We process personal information for any or all of the following purposes:

- providing products or services to you as our client;
- providing information about you to our client;
- processing information about you on behalf of our client;
- contract with you or a third party;
- providing information to you;
- updating our information, including through batch updates (where applicable) and information available from other companies within the group;
- credit, fraud or other relevant checks and verifying your information;
- research and development of new products or services;
- formulating policies;
- marketing, including direct marketing through all channels as far as the law permits, and including our own offers, products or services of third parties that may interest you or offers on behalf of our clients;
- providing proof of any communications between you and Dark Water;
- tracing and collections;
- litigation or other dispute resolution;
- complaints management;
- termination of agreement;
- systems maintenance and other administrative and operational actions;

- internal and external reporting;
- statistical analysis;
- requirements by law;
- third party product or service offerings that may interest you;
- sharing information with third parties in terms of paragraph 7;
- sale of any part of our business or any rights we hold in law;
- other reasonable business purposes;
- other purposes specified from time to time.

7. Sharing Information with Third Parties

We may process and share your personal information with third parties where;

- you have agreed to it,
- we are permitted or required to do so by law,
- processing is necessary to protect the legitimate rights or interests of Dark Water or a third party,
- processing is necessary to conclude a contract with you.

Some of our associates are leads providers and share information with third parties, including our clients, for purposes of direct marketing services, updating information, collections, and tracing.

We may also share your personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates.

If we make use of third-party service providers to provide products or services to you or to provide products or services on our behalf, we will regulate these relationships contractually to ensure that they process your personal information according to the law. Third party service providers may only use your personal information directly for the purposes for which we provided it to them.

We may also share your information for the following purposes:

- Within the group for legitimate business purposes;
- Credit bureaus and fraud agencies;
- Any third party to whom we sell any part of our business or rights in law;
- Any other third party if the law allows or requires us to share the information.

8. Transferring Personal Information Cross Border

You agree that we may transfer your personal information cross border if our business interests require trans-border flow of information. This may typically happen where we have decided to store information with a trusted third party in another country or where a service provider makes use of systems or processes cross border.

9. Retention

We will retain your personal information as required by law and for as long as necessary considering the purpose for which it was collected.

Where we collect information for marketing purposes, we will retain the information for future marketing activities unless you object to the processing of your personal information for this purpose.

Where we provide a service to a client, we will retain your information in accordance with the client's instructions.

10. Security

We undertake to implement all reasonable measures to ensure the security and confidentiality of your personal information, including electronic and computer safeguards like firewalls.

Always use a secure computer when entering information online. Transferring information through the internet may not always be completely secure and we cannot guarantee the security of your information if you use the internet. We implement reasonable security measures from our side, but you use the internet at your own risk.

In the event of a security breach, we will inform you by contacting you on the contact details we have available, by press release, or by any other reasonably suitable method. We will also report a breach to the Information Regulator.

11. Your Rights

You have the right to access certain records that we hold about you. If you apply in writing to receive a copy of the personal information that we hold, we will implement security and verification procedures to ensure that we provide the record to the correct person. We may be allowed in law to charge a fee for this and may refuse the information on certain grounds as allowed in law.

You may at any time request that we update or correct your personal information by contacting darkwaterco@outlook.com.

You may object to our processing, including to object against direct marketing or to object against automated processing where a sole automated decision has a legal or other significant effect or request a restriction to your information. You may also request information to be deleted. You may also withdraw consent. All of these requests will be considered against the provisions of the law to ensure that any continual processing (if applicable) will be allowed. To give an example: where you have given

**International Operations
Financial Concession Facilitator
A.O.D Agreements
Conciliation Resolve
Important Document Courier**



**078 251 7123
darkwaterco@outlook.com
PSIRA Registered, Reg No. 84641
(Private Security Regulatory Autho)
Council Of Debt Collectors
Council No. 00129588/25**

consent to processing but subsequently withdraws your consent, we may still be able to process the information if there is another ground in law which allows for the processing.

If you believe that we have breached this policy, you can lodge a complaint to darkwaterco@outlook.com . We will investigate the matter and may use third party advisors during this process. You can also complain to the Information Regulator using the following contact details:

Website: www.inforegulator.org.za

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2017

Contact number: 010 023 5200

Email: popiacomplaints@inforegulator.org.za

12. Links on our Channels

Our websites or any communication may include links to third party websites or channels. We cannot accept responsibility for the privacy practices of third-party sites and you use it at your own risk.

13. Cookies

We process Cookies in accordance with our Cookie Policy.