

## UNLAWFUL ARREST PRIVACY POLICY

### GENERAL

The [UNLAWFULARREST.CO.ZA](http://UNLAWFULARREST.CO.ZA) and its affiliates (collectively: "UNLAWFUL ARREST") respects your privacy and your personal information. For this reason, UNLAWFUL ARREST has prepared this privacy policy to let you know how it will treat any personal information that it may have about you. UNLAWFUL ARREST will take all reasonable measures, in accordance with this privacy policy, to protect your personal information and to keep it confidential.

*Unlawful Arrest is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This statement of privacy applies to the Unlawful Arrest website and governs data collection and usage. By using the Unlawful Arrest website, you consent to the data practices described in this statement.*

This Privacy Policy is incorporated into and is subject to Unlawful Arrest's Terms and Conditions as reflected on this website.

Unlawful Arrest is committed to ensure that your privacy is protected. This Privacy Policy therefore regulates the manner in which we collect, use, disclose, transfer and store your personal information. We also comply with the principles, outlined in Sections 50 and 51 of the [ELECTRONIC COMMUNICATIONS AND TRANSACTIONS ACT 25 OF 2002](#). ('ECT Act'), which govern your right to having your personal information kept private, which principles are covered in this Privacy Policy.

There is also information about your computer hardware and software that is automatically collected by Unlawful Arrest. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses. This information is used by Unlawful Arrest for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Unlawful Arrest website.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Unlawful Arrest public message boards, this information may be collected and used by others. Note: Unlawful Arrest does not read any of your private online communications. Unlawful Arrest does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

Unlawful Arrest encourages you to review the privacy statements of websites you choose to link to from Unlawful Arrest so that you can understand how those websites collect, use and share your information. Unlawful Arrest is not responsible for the privacy statements or other content on websites outside of the Unlawful Arrest and Unlawful Arrest family of websites.

By using Unlawful Arrest's applications and products, you signify your agreement to the terms of this Privacy Policy. Should we elect to amend this Privacy Policy, we will post the revised policy here, along with the date of revision. Any changes will apply only from date of the revision.

You will be asked to provide your personal information when registering with a Unlawful Arrest website or purchasing your Consumer Credit & Alerts Report, Car Value Report or Business Credit Report. In this regard, we may collect a variety of information, including your:

- ❖ full name,
- ❖ telephone number,
- ❖ email address,
- ❖ SA ID number, Passport Number,
- ❖ address details, and
- ❖ security questions relating to information on your credit report and/or payment profile

For purposes of this Privacy Policy "**Consumer Credit Information**" means consumer credit information as defined in the [National Credit Act \(35 of 2005\)](#) ("**NCA**").

## REGISTERING WITH US

Whereas visiting the Website does not require the visitor to impart any personal information, to access the site's full service and/or register on the Website we would require some basic personal information. You will provide your e-mail address and a secure password. Once we have verified your email address we will request your full name, date of birth and your national identity number (or passport number), and/or thereafter by you actively updating or supplementing your personal information. We may require the following further information, once you have registered with us, which includes but is not limited to:

- ❖ Your gender;
- ❖ Your physical address;
- ❖ Your work address;
- ❖ Your email address/es;
- ❖ Your mobile phone number/s; and
- ❖ Your bank account number. (Used to pay money into your account for verification purposes or upon settlement of a claim)

## PERSONAL INFORMATION

Personal information is data that can be used to uniquely identify or contact a single person, and includes Consumer Credit Information. Unlawful Arrest compiles your personal information contained in your credit report from applications you have made to for example: credit providers or services providers for credit or services.

Unlawful Arrest collects and uses your personal information to operate the Unlawful Arrest website and deliver the services you have requested. Unlawful Arrest also uses your personally identifiable information to inform you of other services available from Unlawful Arrest and its affiliates. Unlawful Arrest may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Only information uploaded that has been expressly authorised by members/agents/ contractors/partners will be securely saved on our servers. This type of information held comprises Birth Certificates Identification Documents, Education Documents, Licences, Agreements, Business Documents, Wills, Passports, Medical history.

### The following personal information is included in your personal report:

- ❖ Identifying information such as: name, surname, ID number, physical and postal address, contact numbers, marital status, spouse details, and current employer and occupation;
- ❖ Public Records: Information that is publicly available as permitted by law such as judgments, sequestrations, and rehabilitation.

### Information of the following nature is not included in your report:

- ❖ Race, creed, colour, ancestry, ethnicity, religion, sexual orientation or political affiliations;
- ❖ Your medical history or status;

### Unlawful Arrest collects your information from recognized data sources in terms of the NCA, including the following information sources:

- ❖ Reports about you that are provided to by service providers that are responsible for obtaining your consent to provide the information to us;
- ❖ Account History / PaymentProfile information from credit / service providers;
- ❖ Directly from you in response to any dealings we have with you;
- ❖ Other registered credit bureaus;
- ❖ Educational institutions;
- ❖ Public record, i.e. the courts.

Unlawful Arrest limits the collection, use and disclosure of personal information to include only what is permitted and prescribed in terms of the NCA or in instances where consumers have consented to such collection, use and disclosure, and which is necessary to our clients for credit / service application to enable them to make meaningful and accurate decisions. Furthermore, Unlawful Arrest takes all reasonable steps to ensure that all records of Consumer Information are submitted, processed and maintained in accordance with the standards required in terms of the NCA, including by placing stringent requirements in this regards on its "data suppliers" (including credit providers and other recognized data sources in terms of the NCA).

#### **ACCOUNT ACCESS/CHANGES**

Should you wish to terminate your account, email [info@unlawfularrest.co.za](mailto:info@unlawfularrest.co.za) with your account details – username, email address, first name and last name. Before we close your account, we notify you via email/OTP for security purposes. Upon confirmation, your account will be terminated and your log in ability deactivated immediately, or in any event within 30 days. To delete or amend any inaccuracies or change your personal information, you may log into your account on our site and make these changes. Emailed requests to amend data shall receive.

#### **OBTAINING CONSENT**

In the majority of instances, is not capable of being provided with direct consent by consumers. Such consent is directly provided by consumers to Unlawful Arrest's data suppliers. Unlawful Arrest however takes all reasonable measures to ensure that all data suppliers are contractually bound to ensure that all legally required consents are obtained prior to accessing any Consumer Credit Information contained in our reports.

#### **NON-PERSONAL INFORMATION**

Non-personal information is data that does not permit direct association with any specific individual. We may collect this information in a number of ways. Should we elect to combine non-personal information with personal information; the combined information will be treated as personal information for as long as it remains combined.

#### **HOW AND WHY WE USE YOUR INFORMATION**

The following are reasons why we would collect your personal and non-personal information:

- ❖ to identify you;
- ❖ where applicable, to create a user account (login user name and password);
- ❖ to fulfil your requests for any information which you're entitled to request and access;
- ❖ to provide service and support;
- ❖ to help us develop, deliver, and improve our services content, and advertising;
- ❖ to send important communications regarding any changes to the terms and conditions and or to advise you of any other important circumstances;
- ❖ for internal purposes such as auditing, data analysis, and research to improve Unlawful Arrest products, services, and customer communications; and

Please note that we may also use (but will not disclose) your personal information to promote and market additional services and special offers from us and/or our affiliates that may be of interest to you. You may opt-out from receiving such communications, at any time. If you wish to opt-out, please contact us at [info@unlawfularrest.co.za](mailto:info@unlawfularrest.co.za)

## HOW WE SHARE YOUR INFORMATION

Confidentiality of your personal information is important to us. Unless we have your permission, we will not use or share your personal information in ways unrelated to the ones described in this Privacy Policy or disclosed to you when you provide us with your data. Unlawful Arrest does not sell, rent or lease your personal information to third parties. Unlawful Arrest may, from time to time, contact you on behalf of external business partners about a particular issue relating to your claim. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, Unlawful Arrest may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Unlawful Arrest and they are required to maintain the confidentiality of your information.

## INFORMATION WE MAY NEED TO SHARE.

We may be required to share personal information in the following circumstances:

- ❖ When investigating a case of fraud, or required by law to comply with a court order or judicial proceeding, or similar legal scenario.
- ❖ At the request of a third party, with your prior consent.
- ❖ When disclosure of information is necessary to protect our rights, your safety or the safety of others.
- ❖ If we are bought or our assets sold as a whole or in portions, or we become involved in a merger. In such an event you will be notified via email and/or prominent advertising on our site. This notice will include changes in ownership or use of your personal information, as well as choices you may have regarding this information.

## SECURITY AND SECRECY

We remind you that you are solely responsible for ensuring the security and secrecy of your user name and password that may be provided to you for any Unlawful Arrest account. Unlawful Arrest cannot bear any responsibility for your failure to ensure this. You therefore indemnify Unlawful Arrest for any losses that may result from your failure to ensure the security and secrecy of your user name and password.

We may only access and/or disclose your personal information without your consent in exceptional circumstances. These include circumstances where we believe such action is necessary to: (a) comply with the law or legal process served on us; (b) comply with requests for information from police or government authorities, (c) protect and defend our rights or property (including the enforcement of our agreements); (d) protect the public interest; (d) act in urgent circumstances to protect the personal safety of our employees or members of the public; (e) where applicable, with your implied consent ; and (f) to the extent permitted or required in terms of the NCA and other relevant national legislation.

## ENSURING THAT YOUR INFORMATION REMAINS ACCURATE

We aim to ensure that your personal information is accurately recorded. To be able to achieve this we adhere to processes that help ensure and maintain data accuracy. We provide individuals with reasonable access to review and correct their personal information, as detailed in our website.

When gathering your personal information Unlawful Arrest works with our data suppliers to increase their awareness of the importance of providing only personal information that is accurate, complete, and up to date. Unlawful Arrest however, cannot alter the information reported by such data suppliers, unless the information is determined to be wrong, incomplete or inaccurate. If you do not agree with the accuracy of information Unlawful Arrest has on file, we have procedures in place to ensure that such information is verified, and where appropriate, amended or corrected. We however rely on you to bring any such information challenges to our attention.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to or making alterations to data we maintain. If you wish to contact us, access, update, or correct your personal information please contact your authorised agent/contractors else contact us at any time or write us to:

❖ by e-mail: [info@unlawfularrest.co.za](mailto:info@unlawfularrest.co.za)

❖ or to the following postal address:

**Unlawful Arrest - P.O Box 92193, Norwood, Johannesburg Gauteng, 2117 or**

**telephonically:**

**Unlawful Arrest Contact Centre: 082 491 6070**

When you contact us please let us know your name, address, any email address you have provided on our website(s) and a description of the circumstances under which you provided the data. We will make reasonable efforts to incorporate as soon as practicable the changes in personal information that we maintain.

#### **CHILDREN'S PRIVACY**

We do not knowingly collect information from children under the age of 18 and our websites do not target children under 18 except where a duly a child guardian has consented thereto. We encourage parents and guardians to take an active role in their children's online activities and interests. We will collect information if our members/agents/contractors/partners and clients require that the information that is to be collected meets with our collection policy that is, that the child records are being held solely and only for legal and lawful purpose.

#### **CHANGES TO THIS STATEMENT**

Unlawful Arrest will occasionally update this statement of privacy to reflect company and customer feedback. Unlawful Arrest encourages you to periodically review this statement to be informed of how Unlawful Arrest is protecting your information.

#### **SECURITY OF YOUR INFORMATION**

Unlawful Arrest secures your personal information from unauthorised access, use or disclosure. Unlawful Arrest secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. We have and shall continue to use our best endeavours to ensure that your personal information remains secure. Furthermore, your personal information is only accessible to those authorised Unlawful Arrest employee members/ agents/contractors/partners for business purposes and on a strictly need to know basis.

Unlawful Arrest has adopted many security measures aimed at securing your personal information. These include the use of firewall technology to protect its data from would be intruders and has numerous processes in place to secure our information such as passwords and security codes, encryption of data, antivirus software and physical security measures. Managerial procedures and a security department are in place to safeguard our information.

#### **RETENTION OF YOUR INFORMATION**

We retain your personal information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws and your consent to such purpose(s) remains valid after termination of our relationship with you. Furthermore, we retain your Consumer Credit Information in our credit information database in accordance with the data retention periods prescribed by the NCA.

#### **COOKIES**

The Unlawful Arrest website use "cookies" to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a webpage server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the webserver that you have returned to a specific page. For example, if you personalise Unlawful Arrest pages, or register with the Unlawful Arrest site or services, a cookie helps Unlawful Arrest to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, physical addresses, and so on. When you return to the same Unlawful Arrest website, the information you previously provided can be retrieved, so

you can easily use the Unlawful Arrest features that you customised.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Unlawful Arrest services or Web sites you visit.

### **THIRD PARTY SITES**

Some pages on our websites may contain links to third-party websites. We do not endorse and have no control over the privacy practices or content of such websites. We recommend you carefully read the privacy policies of each site you visit.

### **ONLINE ADVERTISING**

Unlawful Arrest may engage third parties to help it deliver its banner advertisements and other online communications. The third parties may collect and use information about Unlawful Arrest's customers to help us understand the offers, promotions, and types of advertising that are most appealing to its customers. The personal information they collect is aggregated and cannot be linked to a person. If you do not wish your personal information to be used in this way, please notify us.

- ❖ Third party vendors, including Google and DoubleClick, show Unlawful Arrest's ads on sites on the internet.
- ❖ Third party vendors, including Google and DoubleClick, use cookies to serve ads based on a user's prior visits to Unlawful Arrest's website. o Users may opt out of Google and DoubleClick's use of cookies by visiting the Google advertising opt-out page or by visiting the Network Advertising Initiative opt out page.

### **COMPLIANCE AND ENFORCEMENT OF THIS PRIVACY POLICY**

Our compliance with this Privacy Policy will be monitored on a regular basis. Should you have any queries with our Privacy Policy or the manner in which your personal information is treated, we encourage you to direct any such queries or concerns to Unlawful Arrest by contacting us at the following email address [info@unlawfularrest.co.za](mailto:info@unlawfularrest.co.za). We will ensure you are contacted without delay in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Privacy Policy.

### **A WORD OF CAUTION**

Identity theft is one of South Africa's fastest growing crimes and one that can result in significant damage to an individual's credit report. There are a number of ways that you could fall victim to this crime, including "phishing" (seemingly genuine but forged e-mails from a seemingly reputable company that ask you to provide them with personal information in a linked website) and "garbage sifters" (individuals who sort through your rubbish looking for bank statements, invoices, etc. that reveal your personal information. The best way to avoid becoming a victim is to be alert and aware of suspicious activities and modus operandi used by potential fraudsters.

### **CONTACTING UNLAWFUL ARREST**

Consumers' are welcome to contact Unlawful Arrest should they require more information or have any questions. If you believe that Unlawful Arrest has not adhered to this statement, please contact Unlawful Arrest at [info@unlawfularrest.co.za](mailto:info@unlawfularrest.co.za). We will use commercially reasonable efforts to promptly determine and remedy the problem. We can be contacted using the details indicated in this Privacy Policy above.

AttorneyWize (PTY) LTD (Reg. No. 2015/141442/07) t/a Unlawful Arrest is registered in South Africa.

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