

This privacy notice provides details of the personal information we collect from you, what we do with it, how you might access it and who it might be shared with.

Our Organisation

Moonstone Compliance (Pty) Ltd
25 Quantum Street
Techno Park, Stellenbosch
7600
South Africa
Telephone: 021 883 8000
Organisation E-mail address: Info.officer@moonstoneinfo.com

What we do with your personal information

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Customers / Clients** we collect, use and retain personal information for the following purposes, with the applicable lawful basis:

Processing purpose	Lawful basis
Compliance Leads Management When you enquire about our compliance services.	S11 – We have the data subject’s consent.
Contract Management We have to manage and ensure that the details of your contractual agreement with us are captured.	S11 - To conclude or perform a contract to which the data subject is party
Group Client Reporting As a compliance practice, we provide reports to our clients which address their compliance obligations. These reports may contain personal information.	S11 - To conclude or perform a contract to which the data subject is party
Workshops and Events When you sign up for our online webinars or workshops.	S11 - To conclude or perform a contract to which the data subject is party
Financial Management	S11 - To conclude or perform a contract to which the data subject is party

Your personal information has to be captured by our financial department for invoicing.

Database Management and Client Information

S11 - We, as the Responsible Party, must comply with a legal obligation

We have to ensure that written agreements between us and our clients are accurately recorded and that the personal information captured in the agreement is managed and stored effectively.

Licensing Leads Management

S11 - We have the data subject's consent

When you enquire about our licensing service.

License Applications

S11 - To conclude or perform a contract to which the data subject is party

In terms of the FSCA's official licensing application documentation, you have to provide certain personal information to obtain an FSP license.

Profile Changes

S11 - To conclude or perform a contract to which the data subject is party

In terms of the FSCA's official profile change application documentation, you have to provide certain personal information to effect a profile change on your FSP's license.

Customer sales, service and support

S11 - To conclude or perform a contract to which the data subject is party

Compliance Services (NCA, FAIS, FICA)

S11 - To conclude or perform a contract to which the data subject is party

We have to process your applicable personal information to discharge our obligations as stipulated in our compliance agreement.

Registration Services (NCA)

S11 - To conclude or perform a contract to which the data subject is party

In terms of the NCA's official registration application documentation, you have to provide certain personal information to be approved as a registered credit provider.

Consultation Services (NCA, FAIS, FICA, POPIA)

S11 - To conclude or perform a contract to which the data subject is party

We have to process your applicable personal information to discharge our obligations as stipulated in our compliance agreement.

What personal information do we collect?

We only collect the minimum amount of personal information that is relevant to the processing purpose. If you interact with us on the internet, the personal information we collect depends on whether you only visit our website or, if you make use of our services. If you visit our website, your browser transmits some data automatically, such as your browsing times, the data transmitted and your IP address.

If you make use of our services, your personal information is required to fulfil the requirements of that service and enable us to meet the obligations stipulated in the underlying contractual agreement.

Generally, we collect the following personal information where applicable:

- CIPC documentation (applicable to licensing applications, NCR registration and profile changes);
- Policies and Procedures (applicable to licensing, and profile changes);
- Physical address
- Identification Number
- Telephone number
- Educational history (applicable to licensing applications, profile changes, and our compliance services (comprehensive and consultation and Self-Comply))
- Employment history (applicable to licensing applications, profile changes, and our compliance services (comprehensive and consultation and Self-Comply))
- Insurance Policy Documents and Schedules (applicable to our compliance services (comprehensive and consultation))
- Internal Policies and Procedures (applicable to our compliance services (comprehensive and consultation))
- Email address
- Financial & banking details
- Name, together with other identifying information

Special personal information could be about your health, your racial or ethnic origin, your trade union membership, political persuasion, biometric information or criminal behaviour. We collect the following special personal information, for purposes of our compliance, profile change and licensing services, on the appropriate lawful basis.:

- Criminal behaviour - allegations
 - S27 - For the establishment, exercise or defence of a right or obligation in law
 - Financial Advisory and Intermediary Services Act 37 of 2002
 - Financial Intelligence Centre Act 38 of 2001
 - National Credit Act 34 of 2005
- Race or ethnic origin
 - S27 - For the establishment, exercise or defence of a right or obligation in law

- Financial Advisory and Intermediary Services Act 37 of 2002
- Short-Term Insurance Act 53 of 1998
- Long-Term Insurance Act 52 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Insurance Act 18 of 2017
- National Credit Act 34 of 2005
- Health or sex life
 - S27 - For the establishment, exercise or defence of a right or obligation in law
 - Financial Advisory and Intermediary Services Act 37 of 2002
 - Short-Term Insurance Act 53 of 1998
 - Long-Term Insurance Act 52 of 1998
 - Insurance Act 18 of 2017

Who might we share your personal information with?

To maintain and improve our services, your personal information may need to be shared with or disclosed to our service providers, other organisations such as ours or, in some cases, public or legal authorities.

Where applicable, we transfer personal information to the following organisations and countries:

Data subject type	Organisation name	Type	Country
Customers / Clients	Financial Sector Conduct Authority (FSCA)	Responsible Party	South Africa
Customers / Clients	Freshworks Inc - Freshdesk	Operator	United States
Customers / Clients	Information Regulator (IR)	Responsible Party	South Africa
Customers / Clients	Kanbanize	Operator	Bulgaria
Customers / Clients	MeisterLabs GmbH (Meistertask)	Operator	Germany
Customers / Clients	Moonstone Business School of Excellence (Pty) Ltd	Responsible Party	South Africa
Customers / Clients	Moonstone Information Refinery (Pty) Ltd	Responsible Party	South Africa
Customers / Clients	National Credit Regulator (NCR)	Responsible Party	South Africa

Customers / Clients	Sage	Operator	South Africa
Customers / Clients Data Subject Requests	PrivIQ (Compliance Technology Solutions B.V.)	Operator	Netherlands
Customers / Clients	Venues (workshops)	Operator	South Africa

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

How do we look after personal information?

We limit the amount of personal information collected to only what is fit for the purposes as described above. We restrict, secure and control all our information assets against unauthorised access, damage, loss or destruction - whether physical or electronic. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

How can you access your personal information?

You have the right to request access to any of your personal information we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

If you would like to make a request to see what personal information of yours we might hold, or object to the processing of your personal information, you may make a request from our organisation website or contact us as per the details above

Where it may have been necessary to get your consent to use your personal information, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal information without affecting the lawfulness of processing based on consent before your withdrawal.

Our Information Officer

Hjalmar Bekker
E-mail address: Info.officer@moonstoneinfo.com
Telephone: 021 883 8000

The SA Information Regulator

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below:

The Information Regulator (South Africa)
PO Box 31533
Braamfontein
27 Stiemens St
Braamfontein
E-mail address: complaints.IR@justice.gov.za / infoereg@justice.gov.za