



OUR DATA SHARING AGREEMENT

Definitions

We, us and our	refer to AT THREESIXTY FINANCING (Proprietary) Limited (“@360”), a private company with limited liability registered under the company laws of the Republic of South Africa, registration number 2019/610488/07, and where applicable its franchised business (collectively, the “franchisees”). The principal place of business of @360 is 6 Villa do Mar, Boardwalk Manor, Faerie Glen, Pretoria, Gauteng
Business Partner	refers to any real estate agency or other business partner that shares a 3 rd Party’s personal information in any form with @360 as a franchised business
Franchise	refers to a franchise of @360, which franchise is duly contracted with @360 and therefore acts as a franchised, free contracted agent of @360
3 rd Party	refers to any customer of a Business Partner or other data subject whose personal information is shared by the Business Partner with any member of @360
3 rd Party’s personal information	refers to personal information about the 3 rd Party or any of his or her, or their spouse or dependants (as relevant). It includes information about financial status, gender, age, contact numbers and addresses.
Processing of information	means the automated or manual activity of collecting, recording, organising, storing, updating, sharing, distributing and removing or deleting personal information.

Purpose of this Data Sharing Agreement

The purpose of this Data Sharing Agreement, as read with our Privacy Statement, is to set out how @360 and its franchises collect, use, share and otherwise process all 3rd Party personal information, in line with the Protection of Personal Information Act (“**POPIA**”). This Data Sharing Agreement will be effective from 1 July 2021.

After contacting any 3rd Party, @360 and the franchise will only further process personal information of the 3rd Party in terms of a specific mandate with the 3rd Party, should the 3rd Party enter into such a mandate with @360. Any such mandate will be subject to @360 Privacy Statement. Should the 3rd Party not conclude a mandate with @360, then @360 will not retain any personal information of the 3rd Party unless required by law.

@360 commitment to privacy and POPIA compliance

@360 is committed to protecting all data subjects right to privacy.

As our valued Business Partner, we want you to have the assurance that when you engage with @360, you can trust that any 3rd Party's personal information shared with us will be treated subject to the @360 Privacy Policy (a copy of which can be found on www.at360fin.com), as well as the requirements of POPIA.

You should only share 3rd Party personal information with us if you have the 3rd Party's consent or are otherwise entitled to share such information, by reason of a processing justification under POPIA or any other reason. You should only share such information as is necessary and you should inform the 3rd Party that you have shared the information with us. Should the 3rd Party withdraw their consent given to you, you should notify us thereof as soon as possible.

In your privacy notices with your customers (whose information you might share with @360), you should inform them that any such sharing of personal information with @360 will be subject to this Data Sharing Agreement and @360 Privacy Policy and specifically that:

- The 3rd Party may withdraw his or her consent at any time;
- Should the 3rd Party withdraw such consent or not grant @360 a specific mandate, then @360 will not retain any personal information of the 3rd Party.

We will take all reasonable steps to keep all 3rd Party personal information safe and confidential, and will comply with any undertakings given by you to the 3rd Party in regard to their personal information, alternatively, we will delete their personal information from our recorded keeping systems.

Should you receive any complaints from a 3rd Party in regard to any personal information shared with us, you will notify us as soon as reasonably possible so that we can address the complaint. You can do so by emailing ops@at360fin.com or by otherwise making contact with us.

Binding nature of this Data Sharing Agreement

Should you share a 3rd Party's personal information with any member of @360, then @360 will comply with the terms of this Data Sharing Agreement and @360 Privacy Policy. This undertaking is given in your favour and in favour of the 3rd Party. The 3rd Party may rely on the undertakings given by us in terms of @360 Privacy Policy.

Acceptance is voluntary

Any 3rd Party has the right to object to the processing of his or her personal information. It is voluntary for the 3rd Party to accept the terms and conditions of the @360 Privacy Policy. A 3rd Party may withdraw their consent at any time.

Purpose for processing a 3rd Party's personal information

We undertake in favour of our Business Partner (and the 3rd Parties) that we will only process the 3rd Party's personal information for the following purposes:

1. Applying for offering of our pre-qualification services and applying for home loan finance, commercial and industrial property finance, agricultural property finance, residential-, commercial- and funding solutions and industrial property finance, business finance, asset finance and assurance and insurance home on behalf of the 3rd Party;
2. Applying for any other product or service specifically requested by the 3rd Party or by the Business Partner;
3. Advising the 3rd Party about related products and services that he or she may qualify for as offered by:
 - @360 or its contracted business partners;
 - Any third-party provider that offers related products and services.

We will ensure that any such third-party provider has agreed to keep the information confidential and that same can only be used for a specific agreed purpose.

Privacy Preferences

We will not use 3rd Party personal information for a different purpose than the one stated when you provided the data to us. A 3rd Party may opt out of communications about updated information, new services and marketing messages at any time.

We keep personal information confidential

We will keep the 3rd Party personal information confidential, notwithstanding the source it is collected from, i.e. from our Business Partner, the 3rd Party or any other source.

Sharing of personal information

If a third party asks us for any of 3rd Party personal information, we will share it with them only if:

1. The 3rd Party has given consent for the disclosure of this information to that third party for the provision of @360, for example financial institutions, lenders, insurance companies, deposit taking institutions and FICA verification agencies;
2. Any person or organisation that has a legal right to access the information, for example, regulators, and/or any party entitled to such information in terms of a contract with the 3rd Party.

Sharing for research and improvement purposes

While @360 may share and combine all 3rd Party personal information for market, statistical and academic research purposes, in such cases the personal information will be de-identified.

Direct Electronic Marketing and opting out

@360 will not use information provided by a Business Partner for Direct Electronic Marketing unless it has obtained the 3rd Party's consent to that. Additionally, @360 will always permit a 3rd Party to opt out of any communications from @360.

3rd Parties have the right to know what personal information we have

All 3rd Parties have the right to know what personal information we hold about them and have the right to ask us to update, correct or delete their personal information. Where we cannot delete their personal information, we will take all steps to make it anonymous. Examples of where we may not be able to delete personal information include where the law requires us to keep it.

The following are examples of laws that require us to collect and keep personal information:

- The Electronic Communications and Transactions Act (ECT)
- The Financial Intelligence Centre Act (FICA)
- The Financial Advisory and Intermediary Services Act (FAIS)
- The National Credit Act (NCA)
- The Consumer Protection Act (CPA)
- Long-term Insurance Act (LTIA).
- Financial Sector Regulation Act (FSRA)

Transferring personal information outside South Africa

We will take reasonable steps to ensure that any country, company or person that to which we pass personal information (for example, for the use of cloud services) agrees or is obliged by law in that

jurisdiction to treat personal information with the same level of protection as required by the laws of South Africa.

Changing this Data Sharing Agreement

We may change this Data Sharing Agreement at any time. The most updated version will always be available on www.at360finance.com and will be effective only from publication on our website.