

PRIVACY POLICY AND NOTIFICATION AS CONTEMPLATED IN SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT, ACT 4 OF 2013

BY ACCESSING AND USING AIRCRAFT FINANCE CORPORATION'S WEBSITE OR ANY OF AIRCRAFT FINANCE CORPORATION'S PRODUCTS, THE PERSON USING OR ACCESSING AIRCRAFT FINANCE CORPORATION'S WEBSITE OR PRODUCTS/THE DATA SUBJECT, CONFIRMS AND AGREES THAT HE/SHE/IT HAS READ AIRCRAFT FINANCE CORPORATION'S PRIVACY POLICY AND NOTIFICATION SET OUT IN THE DOCUMENT BELOW, THAT HE/SHE/IT UNDERSTANDS AND ACCEPTS THE TERMS AND CONDITIONS OF THE PRIVACY POLICY AND CONSENTS TO THE PROCESSING OF HIS/HER/ITS PERSONAL INFORMATION BY AIRCRAFT FINANCE CORPORATION AS SET OUT IN PARAGRAPH 16 OF, AND AS FURTHER PROVIDED IN, THIS PRIVACY POLICY. IF SUCH PERSON/THE DATA SUBJECT IS NOT PREPARED TO AGREE AS STATED ABOVE AND TO PROVIDE THE AFORESAID CONFIRMATION AND CONSENT, THE DATA SUBJECT MUST IMMEDIATELY CEASE USING AND ACCESSING THE WEBSITE AND AIRCRAFT FINANCE CORPORATION'S PRODUCTS.

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1. DEFINITIONS AND INTERPRETATION

In this Privacy Policy the following words and/or terms shall have the meanings ascribed to them below and it shall be interpreted as provided herein:

- 1.1 “ **Aircraft Finance Corporation**” means Aircraft Finance Corporation (Pty) Ltd, registration number: 2007/007451/07, trading as Aircraft Finance Corporation;
- 1.2 “ **Aircraft Finance Corporation’s PAIA Manual**” means the manual compiled by Aircraft Finance Corporation as provided in terms of Section 51 of PAIA, which manual appears on Aircraft Finance Corporation’s website, and which is available at its place of business at the street address stated in paragraph 3 of this Privacy Policy;
- 1.3 “**Client**” means a Person who previously was a client or is an existing client or is a potential client of Aircraft Finance Corporation;
- 1.4 “**Contractor**” means any Person who has entered into an agreement with a Aircraft Finance Corporation to provide a service similar to that of an Employee, to Aircraft Finance Corporation;
- 1.5 “**Data Subject**” means any Person to whom Personal Information relates, including but not limited to, Clients, Employees, Contractors, Operators and Suppliers, other Persons and third parties, as the context may indicate;
- 1.6 “**Employee**” means any natural Person who is employed by Aircraft Finance Corporation and receives or is entitled to receive remuneration, including a natural Person who conducts the business of Aircraft Finance Corporation and the directors of Aircraft Finance Corporation;
- 1.7 “**Information Officer**” means the duly appointed information officer of Aircraft Finance Corporation as provided in terms of POPIA, whose details are contained in paragraph 3 of this Privacy Policy;
- 1.8 “**Information Regulator**” means the Information Regulator as established in terms of Section 39 of POPIA;
- 1.9 “**Operator**” means a Person who Processes Personal Information for a Responsible Party (including Aircraft Finance Corporation where appropriate) in terms of a contract or mandate, without coming under the direct authority of that party;
- 1.10 “**PAIA**” means the Promotion of Access to Information Act, Act 2 of 2000 and all rules and regulations issued in terms thereof;
- 1.11 “**Person**” means any natural or juristic person, partnership, joint venture, trust, entity, association or body (whether incorporated or not) and public body, as the context may indicate;
- 1.12 “**Personal Information**” means personal information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: (a) information relating to the race, gender, sex, pregnancy,

marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical,

financial, criminal or employment history of the person; (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) biometric information of the person; (e) personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person,

but excludes information about an individual who has been dead for more than 20 years;

- 1.13 **“POPIA”** means the Protection of Personal Information Act, Act 4 of 2013 and all regulations, applicable rules, guidance notes and codes issued in terms thereof;
- 1.14 **“the/this Privacy Policy”** means the policies and notification as set out in this document;
- 1.15 **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information including (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) disseminating by means of transmission, distribution or making available in any other form or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information, and **“Process”** shall be construed accordingly;
- 1.16 **“Responsible Party”** means a public or private body (including Aircraft Finance Corporation) or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information;
- 1.17 **“Special Personal Information”** means any Personal Information of a data subject, concerning (a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject; or (b) the criminal behaviour of a Data Subject to the extent that such information relates to (i) the alleged commission by a Data Subject of any offence; or (ii) any proceedings in respect of any offence allegedly committed by a Data Subject or the disposal of such proceedings;
- 1.18 **“Supplier”** means any Person who has entered into an agreement with a Aircraft Finance Corporation to provide goods or services to such Aircraft Finance Corporation;
- 1.19 In this Privacy Policy, any reference to:
- 1.19.1 the singular shall include the plural and vice versa;

1.19.2 any one gender shall include the other genders, as the case may be;

- 1.19.3 any statute, regulation, legislation or other law is a reference to the version of that statute, regulation, legislation or law in force at the time of publication of this Privacy Policy as amended or re-enacted thereafter;
- 1.19.4 the words "include" or "including" means "include without limitation" or "including without limitation". Use of the words "include" or "including" is for illustration or emphasis only and when followed by specific examples, it must not be interpreted as limiting the meaning of the general wording preceding it.

2. RECORDAL

- 2.1 This Privacy Policy applies to Aircraft Finance Corporation as a Responsible Party and, amongst others, provides the detail of the information prescribed in terms of Section 18 of POPIA;
- 2.2 Aircraft Finance Corporation strives to safeguard the security of and to protect Personal Information collected by it by taking appropriate, reasonable, technical and organisational measures to prevent loss of, damage to or unauthorised destruction of such Personal Information and unlawful access to or Processing of Personal Information. Any compromise of data integrity or confidentiality will be reported to a Data Subject by email to enable the Data Subject to protect its own interest and Aircraft Finance Corporation will provide the Data Subject with all reasonable assistance in this regard. Aircraft Finance Corporation further implemented processes and procedures to ensure that risks pertaining to such Personal Information are identified and recorded and that appropriate security measures are implemented to mitigate such risks;
- 2.3 Aircraft Finance Corporation shall ensure that all agreements entered into with Operators provide that the Operators are obliged to comply with POPIA and PAIA at all times;
- 2.4 By enquiring about Aircraft Finance Corporation's products and services or completing the online application form, a Client and/or Data Subject will be required to provide Aircraft Finance Corporation with certain Personal Information and Aircraft Finance Corporation will collect Personal Information of Data Subjects, including collecting it through Operators, the use of cookies and tracking technologies;
- 2.5 Aircraft Finance Corporation is required to ensure that Personal Information is accurate and maintained in a secure environment for no longer than is necessary for achieving the purposes for which Aircraft Finance Corporation has collected the Personal Information or subsequently Processed the Personal Information. Aircraft Finance Corporation generally retains Personal Information collected by it in accordance with the timeframes set out in any relevant legislation which applies to the

Personal Information collected. Aircraft Finance Corporation may however need to retain Personal Information for longer e.g. where Aircraft Finance Corporation is required to do so in accordance with legal, regulatory, tax or accounting requirements, or dealing with complaints, legal challenges or current or prospective litigation, dispute resolution or disciplinary or incapacity proceedings;

- 2.6 Aircraft Finance Corporation strives to ensure the security of Personal Information collected by it by taking reasonable measures to prevent the destruction, unlawful access and loss of such Personal Information;
- 2.7 Aircraft Finance Corporation may amend this Privacy Policy from time to time and any amendment shall become effective on the date of publication of such amendment on Aircraft Finance Corporation's website or as otherwise determined by Aircraft Finance Corporation. It remains the obligation of all Data Subjects and Clients to regularly familiarise themselves with the latest version of this Privacy Policy;
- 2.8 This Privacy Policy should be read in conjunction with Aircraft Finance Corporation's PAIA Manual.

3. CONTACT INFORMATION

The following is the contact information of Aircraft Finance Corporation as Responsible Party:

- Name: Aircraft Finance Corporation (Pty) Ltd, registration number: 2007/007451/07, trading as Aircraft Finance Corporation;
- Postal address: 23 9De St, Melrose Estate, Johannesburg, 2198;
- Street address: 23 9De St, Melrose Estate, Johannesburg, 2198;
- Telephone number: [011 467 2990](tel:0114672990);
- Name and electronic mail address of the Information Officer of Aircraft Finance Corporation as authorised by the head of Aircraft Finance Corporation (Chief Executive Officer): Frederik Jacobus Pietersen-frederik@airfincorp.co.za

4. COLLECTION OF PERSONAL INFORMATION

Aircraft Finance Corporation collects the following Personal Information:

- 4.1 information required to identify a Person, including names, identity and registration numbers, obtained from Data Subject directly or from the Companies and Intellectual Property Commission, copies of identity documents, constitutional documents, including registration certificates, memorandums of incorporation, letters of authority and trust deeds, founding statements and partnership agreements, telephone and cell phone numbers and e-mail addresses;
- 4.2 financial records and information including, financial statements, management accounts and copies of bank account statements;
- 4.3 information to determine a Person's creditworthiness and to conduct a credit assessment, including credit bureau information, Deeds Office information and bank codes;
- 4.4 information required for purposes of Aircraft Finance Corporation's agreement with a Client (including invoices), a Supplier, a business associate and an Employee or

Contractor as well as information pertaining to related directors, members, trustees and shareholders, resolutions, minutes of meetings, security registers, share certificates, title deeds, bond

documentation, records relating to the appointment of officials, auditors, tax records, personnel records and information, correspondence and contracts and records regarding assets and liabilities;

- 4.5 information to determine if a Person has the legal capacity to act, including marriage certificates, birth certificates, Deeds Office information and constitutional documents;
- 4.6 information required for statistical purposes, market and other research, marketing in general and to improve a Aircraft Finance Corporation's services or communication with its Clients and other Persons, including IP addresses, information obtained through the use of cookies and tracking technologies, information relating to the routing, duration and time of electronic communications on electronic communication networks, information collected through web browsers, search terms used, web pages accessed, information pertaining to visits to Aircraft Finance Corporation's website, including the number of visits, average time spent on the website, pages viewed, other websites, the type of web browser used and information collected through social networking services (which social networking services may collect information on its own, subject to its own privacy policies and practices), lists of the products and services in which an interest is expressed when accessing Aircraft Finance Corporation's website, personal or professional interests, demographics, experiences with Aircraft Finance Corporation's products;
- 4.7 information required for purposes of litigation, disciplinary and incapacity proceedings;
- 4.8 information required in terms of legislation.

5. SOURCES OF COLLECTION OF PERSONAL INFORMATION

- 5.1 Aircraft Finance Corporation shall, as far as possible, always collect Personal Information about a Data Subject directly from the Data Subject, except as otherwise provided in terms of POPIA;
- 5.2 If Aircraft Finance Corporation collects Personal Information from a source other than directly from the Data Subject, it shall ensure that such collection is done as prescribed by law;
- 5.3 Where Aircraft Finance Corporation does not collect the Personal Information directly from the Data Subject, the sources from which Aircraft Finance Corporation collects the Personal Information are as follows and the following shall apply:
 - 5.3.1 the Data Subject's auditors;
 - 5.3.2 the Data Subject's bankers and other financial institutions with which the Data Subject has or had a relationship;
 - 5.3.3 credit bureaux;
 - 5.3.4 CIPC;
 - 5.3.5 the Deeds Offices;

5.3.6 the Data Subject's debtors;

- 5.3.7 social media platforms, emails, letters, telephone calls, newspapers, electronic search engines, websites, cookies, tracking technologies, applications and surveys;
- 5.3.8 Aircraft Finance Corporation's business associates and service providers;
- 5.3.9 government institutions;
- 5.3.10 the members of the group of entities of which Aircraft Finance Corporation forms part;
- 5.3.11 the Data Subject's spouse, dependants, partners, employer, a joint applicant or account holder and other similar sources or related Persons;
- 5.3.12 Persons the Data Subject has authorised to share his/her/its Personal Information, such as a Person that makes a travel booking on his/her/its behalf, or a medical practitioner for insurance purposes;
- 5.3.13 attorneys, tracing agents, debt collectors and other Persons that assist with the enforcement of agreements;
- 5.3.14 payment processing services providers, merchants, banks and other Persons that assist with the processing of customers' payment instructions, such as card scheme providers (including VISA or MasterCard);
- 5.3.15 insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products and the assessment of insurance claims;
- 5.3.16 law enforcement and fraud prevention agencies, and other Persons tasked with the prevention and prosecution of crime;
- 5.3.17 regulatory authorities, industry ombudsmen, government departments, and local and international tax authorities;
- 5.3.18 qualification information providers;
- 5.3.19 trustees, executors or curators appointed by a court of law;
- 5.3.20 courts of law and tribunals;
- 5.3.21 marketing list providers.

6. PURPOSE OF COLLECTION OF PERSONAL INFORMATION

The following are the Purposes for which Personal Information is being collected and Processed by Aircraft Finance Corporation:

- 6.1 to provide and maintain the products and services offered by Aircraft Finance Corporation;
- 6.2 to identify a Person;
- 6.3 to conduct risk, credit and affordability assessments and credit scoring and to develop credit scoring models and tools;
- 6.4 to determine if a Person is creditworthy and/or if Aircraft Finance Corporation should enter into an agreement or relationship with a Person;
- 6.5 to draft, complete, give effect to and/or perform in terms of all agreements and

documentation relating to a Person's agreements and relationship with the Aircraft Finance Corporation;

- 6.6 to determine if a Person has the requisite legal capacity to act;
- 6.7 to enforce Aircraft Finance Corporation's rights and to use in the event of a dispute in dispute resolution proceedings or in litigation, disciplinary or incapacity proceedings;
- 6.8 to communicate with Persons;
- 6.9 to comply with tax requirements;
- 6.10 to comply with labour related requirements;
- 6.11 to comply with the requirements of the law, court order or applicable code of conduct;
- 6.12 to store the Personal Information securely and to comply with record keeping and reporting requirements;
- 6.13 to conduct market and other research;
- 6.14 to engage with a Person for marketing purposes, including direct marketing;
- 6.15 to compile statistics;
- 6.16 to provide Clients with products and services, to notify Clients about changes or developments to such products and services and to improve Aircraft Finance Corporation's website, products and services;
- 6.17 to respond to inquiries and/or complaints or Process requests in relation to Personal Information;
- 6.18 to use during Aircraft Finance Corporation's customer care processes and procedures;
- 6.19 to update Aircraft Finance Corporation's records about Clients and related matters;
- 6.20 to maintain internal record keeping including to retain Personal Information in a central data base;
- 6.21 to prevent, detect and report fraud and other criminal action;
- 6.22 to comply with credit reporting obligations;
- 6.23 to use in relation to competitions, surveys and promotions;
- 6.24 to evaluate the effectiveness of Aircraft Finance Corporation's marketing and for research, training and statistical analysis with the aim of improving Aircraft Finance Corporation's services; and
- 6.25 to make Aircraft Finance Corporation's website easier to use and to provide Persons with access to the website or specific parts thereof; and
- 6.26 to evaluate and/or negotiate a merger, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Aircraft Finance Corporation's assets, whether as a going concern or as part of bankruptcy, liquidation, business rescue or similar proceeding, in which Personal Information held by Aircraft Finance Corporation may be part of the assets transferred;
- 6.27 to use in litigation, dispute resolution proceedings or labour disputes and to generally protect Aircraft Finance Corporation's rights;
- 6.28 for any related purposes,

on condition that Processing is necessary to conclude or perform under a contract Aircraft Finance Corporation has with a Data Subject or to provide a solution to a Client, the law requires or

permits such Processing, such Processing is required to protect or pursue a Client's, Aircraft Finance Corporation's or a third party's legitimate interest or the Data Subject or a competent person, if the Data Subject is a child, has consented thereto, and Aircraft Finance Corporation will only further Process Personal Information or Personal Information of children or Special Personal Information as specifically provided in PAIA or the law.

7. IS THE SUPPLY OF THE PERSONAL INFORMATION BY A DATA SUBJECT VOLUNTARY OR MANDATORY?

7.1 The supply of Personal Information by the Data Subject as required by Aircraft Finance Corporation is voluntary, subject to the provisions of paragraph 8 below;

7.2 Where a Client provides or has to provide Aircraft Finance Corporation with Personal Information of third parties, such Client must take steps to inform the third party that the Client needs to disclose the third party's Personal Information to Aircraft Finance Corporation, and the Client must identify Aircraft Finance Corporation to such third party. Unless otherwise advised in writing by the Client, Aircraft Finance Corporation will accept that the third party did not object to Aircraft Finance Corporation Processing the third party's Personal Information and Aircraft Finance Corporation will Process the third party's Personal Information in accordance with this Privacy Policy.

8. THE CONSEQUENCES OF FAILURE TO PROVIDE THE PERSONAL INFORMATION TO AIRCRAFT FINANCE CORPORATION

Should a Person or Client fail or neglect to provide any Personal Information to Aircraft Finance Corporation as requested, it may cause Aircraft Finance Corporation to refuse to enter into a business or other relationship with such Person or a Client and/or may prevent Aircraft Finance Corporation from complying with its obligations in terms of the law.

9. THE FOLLOWING LAWS ARE AUTHORISING OR REQUIRING THE COLLECTION OF PERSONAL INFORMATION BY AIRCRAFT FINANCE CORPORATION:

9.1 Deeds Registries Act, Act No. 47 of 1937;

9.2 The Criminal Procedures Act, Act No. 51 of 1977;

9.3 The Labour Relations Act, Act No. 66 of 1995;

9.4 Employment Equity Act, Act No. 55 of 1998;

9.5 The Basic Conditions of Employment Act, Act No. 75 of 1997;

9.6 Compensation for Occupational Injuries and Diseases Act, Act No. 130 of 1993;

9.7 Occupational Health and Safety Act, Act No. 85 of 1993;

- 9.8 Competition Act, Act No. 89 of 1998;
- 9.9 Insolvency Act, Act No. 24 of 1936;
- 9.10 The Companies Act, Act No. 61 of 1973;
- 9.11 The Companies Act, Act No. 71 of 2008;

- 9.12 Unemployment Insurance Act, Act No. 63 of 2001;
- 9.13 Value Added Tax Act, Act No. 89 of 1991;
- 9.14 Skills Development Act, Act No. 97 of 1998;
- 9.15 Skills Development Levies Act, Act No. 9 of 1999;
- 9.16 Trademarks Act, Act No. 194 of 1993;
- 9.17 Income Tax Act, act No. 58 of 1962.

10. CROSS BORDER TRANSFER OF PERSONAL INFORMATION

Aircraft Finance Corporation intends to transfer Personal Information to the following third party countries or international organisations and the level of protection afforded to the Personal Information by those third party countries or international organisations:

- 10.1.1 Aircraft Finance Corporation's service providers situated or with facilities in countries outside South Africa, in respect of the storage or retention of electronic information and data;
- 10.1.2 Aircraft Finance Corporation's business associates in countries outside South Africa, in respect of business opportunities in such countries;
- 10.1.3 Other third parties, if the relevant transaction or situation requires cross-border Processing;
- 10.1.4 Aircraft Finance Corporation's bankers which are international organisations,
- 10.1.5 the transfer otherwise complies with the provisions of POPIA;

but all of the above will only be done if the relevant service provider, business associate, other third party or banker, is subject to a law, binding corporate rules or a binding agreement which provide an adequate level of protection as envisaged in POPIA or if a Data Subject consents to the transfer of its Personal Information to third parties in foreign countries or as otherwise provided in POPIA.

11. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL INFORMATION COLLECTED BY AIRCRAFT FINANCE CORPORATION

Aircraft Finance Corporation may disclose Personal Information to the following third parties:

- 11.1 Aircraft Finance Corporation's shareholders, holding company, subsidiaries and other entities forming part of the group of entities of which Aircraft Finance Corporation is a member;
- 11.2 Aircraft Finance Corporation's insurers, underwriters and insurance brokers;
- 11.3 Aircraft Finance Corporation's auditors and other professional advisers (including legal advisers);
- 11.4 judicial, regulatory, law enforcement and prosecution bodies (including applicable ombudsmen and tax authorities);

- 11.5 government authorities;
- 11.6 courts, tribunals, dispute resolution bodies and disciplinary or disability forums;
- 11.7 the general public as approved by a Data Subject;
- 11.8 employment verification agencies;

- 11.9 tracing agents, debt collectors and other Persons assisting Aircraft Finance Corporation to enforce its rights;
- 11.10 Credit bureaux;
- 11.11 Aircraft Finance Corporation's bankers;
- 11.12 Client's bankers, auditors and/or other advisers;
- 11.13 Aircraft Finance Corporation's business associates;
- 11.14 Aircraft Finance Corporation's Employees and Contractors;
- 11.15 Aircraft Finance Corporation's service providers and Suppliers, including payment processing service providers and Persons who provide Aircraft Finance Corporation with technical support and assistance in respect of its website, Persons that provide back-office services, Persons that provide hosting services or who track Aircraft Finance Corporation's website's activities and analytics, and Persons engaged to market and/or distribute Aircraft Finance Corporation's products and/or services;
- 11.16 a third party that may acquire all or part of Aircraft Finance Corporation's business, assets or shares, or that may succeed Aircraft Finance Corporation in carrying on all or a part of its business, whether by merger, acquisition, reorganisation or otherwise;
- 11.17 Persons authorised by a Data Subject;

12. NATURE OR CATEGORY OF PERSONAL INFORMATION COLLECTED BY AIRCRAFT FINANCE CORPORATION

- 12.1 **In respect of Clients, security providers, service providers, Suppliers business associates** – Personal Information collected by Aircraft Finance Corporation directly from them, including Personal Information collected from a third party acting for or on behalf of Aircraft Finance Corporation, Personal Information collected from a third party and records of Personal Information generated by Aircraft Finance Corporation relating to them, including transactional records, financial records, bank details including bank account numbers and products utilised, bank account statements operational records, databases, records regarding information technology, marketing records, internal and external correspondence, product records, statutory records, internal policies and procedures, supervisory body related records, securities and equities, records held by their officials, shareholder Personal Information, name, identity number, race, nationality, language, gender, telephone number, addresses, e-mail addresses, IP addresses, domain names, biometric special information, vehicle registration, information of their representatives, surveillance records, contracts, location information and information held by third parties including information obtained from credit bureaux, Deeds Offices and the Companies and Intellectual Property Commission, business name, business type and how long a business has been in operation, personal views and preferences and the views of others about

them;

- 12.2 **In respect of Employees and Contractors** – Personal Information of Employees and Contractors including personal records and information collected from Employees and Contractors, records collected from a third party relating to an Employee or Contractor, employment history, conditions of employment, employment contracts, agreements with Contractors and other related records, internal evaluation records and other internal records, photographs, video material, records of disciplinary and incapacity proceedings, financial records, financial history, correspondence relating to Employees or Contractors, training schedules, -records and -material, qualifications, experience, curriculum vitae, psychometric records, medical history and information, health and disability information, biometric information, pension and provident fund information, bank details, tax and financial information, contracts, beneficiary information, vehicle registration, performance records, payroll records, electronic access records, physical access records, surveillance records, geo location, GPS location, social media profiles and information, personal views and preferences, health and safety records, background checks, criminal records, employment history, application forms, family members' Personal Information, medical and disability information, Personal Information acquired for processing travel documents, children's Personal Information including birth certificates and identity numbers, children's medical information and disability information and children's information for processing of travel documents;
- 12.3 **In respect of visitors** – Personal Information collected including names, identity number and other Personal Information, physical access records, electronic access records, scans and photographs, surveillance records and biometric information;
- 12.4 **In respect of marketing, research and statistics** – See paragraph 4.6 above.

13. RIGHT OF ACCESS TO AND RIGHT TO RECTIFY OR CORRECT PERSONAL INFORMATION

- 13.1 Aircraft Finance Corporation shall take reasonably practicable steps to ensure that Personal Information held by it is complete, accurate, not misleading and is updated when necessary;
- 13.2 A Data Subject has a right of access to its Personal Information held by Aircraft Finance Corporation on condition that the requirements for access have been met, that the request is made in the form prescribed by PAIA (as set out in Aircraft Finance Corporation's PAIA Manual) and addressed to Aircraft Finance Corporation at its address or e-mail address as stated in paragraph 3 above;
- 13.3 A Data Subject has the right to submit a request for access to records and Personal Information, on condition that he/she/it has provided to Aircraft Finance Corporation, acceptable proof of his/her/its identity and after payment of any fee required by law (if applicable) as set out in Annexure 2 to Aircraft Finance Corporation's PAIA Manual;

- 13.4 Aircraft Finance Corporation will provide access to a Data Subject, to the requested Personal Information or access to its records regarding a Data Subject's Personal Information on condition

that the requirements of Aircraft Finance Corporation's PAIA Manual, POPIA, PAIA and any other relevant legislation (if any) have been met and the prescribed fees as set out in Annexure 2 of Aircraft Finance Corporation's PAIA Manual, have been paid;

- 13.5 A Data Subject is entitled to request access to Personal Information of third parties on condition that he/she/it has complied with the requirements for access as provided in PAIA and that he/she/it has paid the reasonable fees as determined by Aircraft Finance Corporation, set out in Annexure 2 to Aircraft Finance Corporation's PAIA Manual;
- 13.6 If a public body lodges a request for access to records or Personal Information, the public body must comply with the provisions of PAIA and/or POPIA, and must amongst others, provide sufficient detail to enable Aircraft Finance Corporation to determine if such request is in the public interest, as required in terms of the law;
- 13.7 Aircraft Finance Corporation will respond to a request for access to records or Personal Information, within a reasonable time as determined in view of the particular circumstances prevailing at the time;
- 13.8 A Data Subject has the right to request Aircraft Finance Corporation to rectify or correct or delete Personal Information about the Data Subject in Aircraft Finance Corporation's possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or to destroy or delete a record of Personal Information about the Data Subject that Aircraft Finance Corporation is no longer authorised to retain as provided in POPIA, by addressing a written request in the form prescribed by POPIA, to Aircraft Finance Corporation at the addresses referred to in paragraph 3 of this Privacy Policy. On receipt of the abovementioned request from a Data Subject, Aircraft Finance Corporation shall as soon as reasonably practicable, deal with the request as provided in terms of POPIA.

14. RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION

- 14.1 A Data Subject has the right to object to the Processing of Personal Information collected by Aircraft Finance Corporation, as provided in section 11(3) of POPIA, on reasonable grounds relating to his/her/its particular situation or for purposes of direct marketing other than as provided in Section 69 of POPIA, by addressing a written objection in the form prescribed by POPIA, to Aircraft Finance Corporation at the addresses referred to in paragraph 3 of this Privacy Policy;
- 14.2 A Data Subject who wishes to object to the Processing of his/her/its Personal Information, must take cognisance of the consequences of failure to provide the Personal Information to Aircraft Finance Corporation as set out in paragraph 8 of this Privacy Policy;

14.3 On receipt of an objection as envisaged in paragraph 14.1, Aircraft Finance Corporation shall deal with the objection as provided in terms of POPIA.

15. RIGHT TO LODGE A COMPLAINT TO THE INFORMATION REGULATOR AND THE CONTACT DETAILS OF THE INFORMATION REGULATOR:

- 15.1 A Data Subject has a right to lodge or submit to the Information Regulator, in the form and manner prescribed in terms of POPIA, a complaint regarding an alleged interference with or violation of the protection of Personal Information of a Data Subject;
- 15.2 The Information Regulator's contact details are as follows:
- JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - PO Box 31533, Braamfontein, Johannesburg, 2017
 - Telephone number: +27 (0)10 023 5200
 - Complaints e-mail address: complaints.IR@justice.gov.za
 - General enquiries e-mail address: infoREG@justice.gov.za

16. CONSENT BY DATA SUBJECT

- 16.1 Aircraft Finance Corporation Processes Personal Information as set out in Aircraft Finance Corporation's PAIA Manual and in line with the requirements of POPIA, PAIA and other relevant legislation. In particular, Aircraft Finance Corporation strives to comply with the conditions for lawful Processing of Personal Information as provided in Section 4 of POPIA and as set out in Aircraft Finance Corporation's PAIA Manual;
- 16.2 Each Data Subject is reminded to familiarise him-/her-/itself with the provisions of Aircraft Finance Corporation's PAIA Manual, POPIA, PAIA and the law and to obtain his/her/its own independent advice (including legal advice) should he/she/it so require;
- 16.3 Aircraft Finance Corporation will accept that a Data Subject has familiarised him-/her-/itself of the provisions of Aircraft Finance Corporation's PAIA Manual, POPIA, PAIA and the law and exercised its right to obtain independent advice as stated in paragraph 16.2 above or that the Data Subject has willingly, without any coercion, dispensed with the necessity to familiarise him-/her-/itself of the provisions of Aircraft Finance Corporation's PAIA Manual, POPIA, PAIA and/or the right to obtain such advice;
- 16.4 Each Data Subject, by accessing and/or using Aircraft Finance Corporation's website, voluntarily consents to Aircraft Finance Corporation collecting and Processing his/her/its Personal Information as provided in this Privacy Policy and Aircraft Finance Corporation's PAIA Manual;
- 16.5 Each Data Subject hereby specifically consents that Aircraft Finance Corporation may perform a credit search on its credit records at any registered credit bureau and to Aircraft Finance Corporation requesting and obtaining credit information pertaining to such Data Subject from any credit reporting agency or institution for the purpose of

concluding any transaction, and contacting, requesting and obtaining information (for the avoidance of doubt this includes any and all information held on a Data Subject's profile by any registered credit bureau, including Aircraft Finance Corporation (Pty)

- (“Aircraft Finance Corporation”), including payment profile information) from any credit bureau, including Aircraft Finance Corporation (a registered credit bureau), to perform an assessment of the Data Subject’s behaviour, profile, payment patterns, indebtedness, whereabouts and creditworthiness, in any format (including in pdf, xml or raw data string) available from any credit bureau, including Aircraft Finance Corporation and to continuously access the Data Subject’s information from such credit bureau, including Aircraft Finance Corporation for as long as the Persons acting on behalf of the Data Subject may have a relationship with the Data Subject or the Data Subject may have a relationship with Aircraft Finance Corporation or for as long as otherwise provided by law (whichever is the longest). Aircraft Finance Corporation may monitor a Data Subject’s payment behaviour by researching his/her/its records at any registered credit bureau and may make any reasonable enquiries to verify and research any details provided by a Data Subject to Aircraft Finance Corporation and Aircraft Finance Corporation may make any reasonable enquiries to verify and research any details provided by a Data Subject to Aircraft Finance Corporation;
- 16.6 Aircraft Finance Corporation may access information obtained in any format, including online, batch and raw xml string and use information and data obtained from any registered credit bureau; Aircraft Finance Corporation may record and transmit details (including Personal Information) in respect of a Data Subject’s conduct and performance in respect of his/her/its obligations in terms of any agreement with or concerning the Data Subject;
- 16.7 Aircraft Finance Corporation may submit the Data Subject’s information, including payment profile and default information and any other relevant information as allowed by the National Credit Act, to any credit bureau including Aircraft Finance Corporation and may allow any credit bureau including Aircraft Finance Corporation to release the information for lawful purposes;
- 16.8 Aircraft Finance Corporation may obtain and disclose any of information of a Data Subject if necessary or if it may be of benefit to him/her/it or where Aircraft Finance Corporation is legally compelled to do so, or where it is in the public interest to disclose such information, or where the interests of Aircraft Finance Corporation require the obtaining and/or disclosure of such information;
- 16.9 the credit bureau may use the information provided to it in the normal course of its business and it may be accessed by credit providers and any other registered credit bureau and that this consent may be disclosed to any credit bureau;
- 16.10 If a Data Subject wants Aircraft Finance Corporation not to collect and/or Process his/her/its Personal Information, he/she/it must immediately cease accessing and/or using Aircraft Finance Corporation website and Aircraft Finance Corporation’s systems. Should a Data Subject wish to withdraw any consent previously given by

him/her/it (including the consent contained herein), he/she/it must notify the Information Officer thereof in writing. A Data Subject who wishes that Aircraft Finance Corporation should not collect or Process his/her/its Personal Information or who wishes to withdraw any consent previously given by him/her/it, must take cognisance of the consequences of failure to provide the Personal Information to Aircraft Finance Corporation, as set out in paragraph 8 of this Privacy Policy;

- 16.11 Insofar it may be necessary, each Data Subject hereby specifically consents to Aircraft Finance Corporation Processing his/her/its Personal Information for the purpose of direct marketing by means of, amongst others, any form of electronic communication including automatic calling machines, facsimile machines, WhatsApp messages, SMS's or e-mail, on condition that Aircraft Finance Corporation complies with the law in this regard;
- 16.12 The form prescribed by POPIA for a Responsible Party to apply for consent of a Data Subject for the Processing of Personal Information for the purpose of direct marketing (Form 4), is reproduced on the next page of this Privacy Policy and it shall be deemed that the form has been signed on behalf of Aircraft Finance Corporation and submitted to and signed by or on behalf of each Data Subject using or accessing Aircraft Finance Corporation's website and/or products.

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FORM 4

**APPLICATION FOR THE CONSENT OF A DATA SUBJECT FOR THE PROCESSING
OF PERSONAL INFORMATION FOR THE PURPOSE OF DIRECT MARKETING IN
TERMS OF SECTION 69(2) OF POPIA**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION,
2018**

[Regulation 6]

TO: ALL DATA SUBJECTS USING OR ACCESSING AIRCRAFT FINANCE
CORPORATION'S WEBSITE AND/OR PRODUCTS

FROM: AIRCRAFT FINANCE CORPORATION (PTY) LTD TRADING AS AIRCRAFT
FINANCE CORPORATION

CONTACT PARTICULARS: AS SET OUT IN PARAGRAPH 3 OF THE PRIVACY POLICY

Signed: Frederik Jacobus
Pietersen

Signature of designated
person
deemed to be signed by Frederik
Jacobus Pietersen in his capacity as
Information Officer

PART B

I, the Data Subject using or accessing Aircraft Finance Corporation's website and/or

Give my consent
products, hereby

To receive direct marketing of goods or services to be marketed by means of electronic
communication.

SPECIFY GOODS OR SERVICES: Services relating to financial- and related products

SPECIFY METHOD OF COMMUNICATION: Fax, mail, e-mail, automatic calling machines,
SMS, and telephone.

This Consent is deemed to have been signed by the Data Subject on the day that the Data
Subject used or accessed Aircraft Finance Corporation's website and/or products

Signature of Data Subject

Deemed to have been signed by or on behalf of each Data Subject
who uses or accesses Aircraft Finance Corporation's website
and/or products

17. DISCLAIMER

- 17.1 Aircraft Finance Corporation shall not be liable for any losses incurred or damages suffered by anyone (including Data Subjects) where data was provided by a Person to Aircraft Finance Corporation through Aircraft Finance Corporation's website or through the internet;
- 17.2 Aircraft Finance Corporation's website may contain links or references to other third parties' websites which are not the property of or under Aircraft Finance Corporation's control. This Privacy Policy does not apply to such third parties' websites and Aircraft Finance Corporation shall not be liable for the Processing practices and/or privacy policies of such third parties and/or their websites or the cookies that those websites may use;
- 17.3 If a Person posts content to or comment on another party's posts on a user forum on Aircraft Finance Corporation's website, such Person's views will be available to all persons who has access to such forum. If a Person publishes any Personal Information on such forum, Aircraft Finance Corporation will have no control over how such Personal Information may be used or Processed. Aircraft Finance Corporation does not accept any liability in respect of such Personal Information and Aircraft Finance Corporation shall be entitled to remove any posts it considers inappropriate;
- 17.4 No Data Subject shall have any claim against Aircraft Finance Corporation in respect of any disclosure of its Personal Information as envisaged in this Privacy Policy and each Data Subject indemnifies Aircraft Finance Corporation against any loss or liability as a result of Aircraft Finance Corporation acting in terms of any consent and/or authorisation granted as envisaged in this Privacy Policy.

18. AVAILABILITY OF THIS PRIVACY POLICY

This Privacy Policy (as updated from time to time) is available on Aircraft Finance Corporation's website ([www. Aircraft Finance Corporation.co.za](http://www.AircraftFinanceCorporation.co.za)) and at its principal place of business during normal business hours (08H30 to 16H30 on normal business days i.e. all weekdays excluding Saturdays, Sundays, official public holidays and other days when Aircraft Finance Corporation's place of business is not open for business as a consequence of restrictions imposed by government e.g. in terms of lock down regulations as a result of the Covid 19 pandemic).