



BE FINANCIAL GROUP LIMITED

PRIVACY POLICY

Our Commitment to You

Be Financial Group appreciates the opportunity to help you meet your financial needs. Earning and keeping your trust is at the very core of our business. We are committed to respecting and protecting the privacy and confidentiality of the Personal Information you have entrusted to us. It is important for you to understand what Personal Information we will collect, how we will use it, and who may see it.

Scope

This Privacy Policy applies to the operations of Be Financial Group Limited and its subsidiaries and affiliates (Be Mobile Limited, Be Mobile Ltd, Be Mobile SA (Pty) Ltd and Be Mobile SARL) and using the trade names Be Mobile, Be Mobile Africa and Be One, regardless of how you choose to do business with us – in our office, online, by smartphone or by telephone.

This Privacy Policy outlines our commitment to you and incorporates the following 10 key privacy principles:

1. Accountability

We have strict policies and procedures governing how we deal with your Personal Information. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our Chief Privacy Officer oversees privacy governance including policy, dispute resolution, education, communications activities, and reporting to our Board of Directors on privacy matters. Please see Contact Us for information on how to reach our Chief Privacy Officer.



2. Identifying Purpose

When we collect your Personal Information, we may use or disclose it to:

- verify your identity;
- ensure we have correct or up to date information about you;
- provide and manage products and services you have requested or accepted;
- understand your financial services requirements;
- protect against fraud, and manage credit risk and other business risks;
- determine suitability of products and services for you;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;
- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products and services that may be of interest to you;
- understand our customers and to develop and tailor our products and services, and
- respond to any questions you may have.

If a new purpose for using your Personal Information develops, we will identify that purpose.

3. Consent and Your Choices

When you apply for or accept a new product or service, we obtain your consent to collect, use or disclose your Personal Information for the purposes set out in Principle 2 - Identifying Purpose.

Please note that you cannot withdraw your consent to the collection, use and disclosure of your Personal Information if:

- we are legally required to collect, use or disclose your Personal Information, or
- it relates to a credit product we have granted to you where we are required to collect and exchange your Personal Information on an ongoing basis with credit bureaus, credit insurers and other lenders.

Withdrawing your consent in certain situations may also mean that we may not be able to provide you with the products or services you request.



4. *Limited Collection*

We only collect the Personal Information that we determine we need for the purposes set out in Principle 2 - Identifying Purpose.

For example, we may collect:

- **Contact Information** including address, telephone number and email address.
- **National Identify Card or Passport Information** as required in order to comply with AML and KYC requirements.
- **Financial Information** to ensure that the advice and/or products we provide you are appropriate for you and the investments you purchase are suitable for you.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk.
- **Mobile Use Information** to better understand your interests and needs so that we can serve you better.

We may collect Personal Information about you from you and from third parties or sources that are available to the public to satisfy legal requirements or regulatory expectations or to manage our risk and to help us understand our customers in order to develop and tailor our product and service offerings.

You can choose not to provide us with certain information in some situations, but if you make this choice, we may not be able to provide you with the product, service, or information you request.

We may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record. If you do not wish to have your call recorded, you have other options to conduct business with us such as online, or by contacting us in writing.



5. Limited Use and Disclosure

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Policy. Personal Information may be released to third parties including legal or regulatory authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts).

We may share your Personal Information within the Be Financial Group for the purposes described in Principle 2 – Identifying Purpose.

We do not sell the names or other Personal Information of our customers. We do not disclose the names or other Personal Information of our customers to other companies outside of the Be Financial Group without consent unless required or permitted by law.

Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganization or other change in corporate control.

We may use other companies to provide services on our behalf such as data processing, account administration, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes.



6. Retention

We have policies in place that govern the retention of your Personal Information so it will be kept only for as long as reasonably necessary to fulfill its intended purpose or to satisfy legal requirements.

7. Accuracy

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you.

8. Safeguards

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

9. Openness

From time to time, we may make changes to this Privacy Policy. This Privacy Policy at www.befinancialgroup.com/privacy is always the most recent version.

Please see Contact Us to answer any questions you may have about our Privacy Policy.



10. Individual Access

Requests to review or verify your Personal Information, or to find out to whom we have disclosed it, must be made to us in writing. We will need specific information from you to enable us to search for, and provide you with, the Personal Information we hold about you. If we are unable to provide some of the Personal Information we hold about you, we will tell you why. To request to review or verify your Personal Information please see Contact Us.