



Privacy Policy



Table of Contents

Versioning:	2
1. Introduction	3
2. Personal Information We Collect	3
3. How We Collect Information	3
4. Purpose Of Processing	4
5. Disclosure Of Personal Information	4
6. Cross-Border Data Transfers	4
7. Data Retention	4
8. Data Security	4
9. Data Breach Management	5
10. Direct Marketing	5
11. Automated Decision-Making	5
12. Your Rights	5
13. Access To Information (PAIA)	5
14. Complaints	5
15. Governance And Updates	5
16. Regulatory Contact Details	6

Versioning:

Version No.	Description	Author	Date
1.	Draft of policy	Diyuti Mohanlal	March 2026

1. Introduction

1.1 This Privacy Policy explains how **Mpowa Finance (Pty)Ltd** (“**Mpowa**”, “**we**”, “**us**”, “**our**”) collects, processes, uses, discloses and protects personal information while providing financial services, including short-term and medium-term lending.

1.2 This Policy applies to all individuals interacting with Mpowa (Pty) Ltd in South Africa, including customers, prospective customers, employees, service providers, and other stakeholders.

1.3 We are committed to processing personal information lawfully, reasonably, and transparently, in accordance with applicable South African data protection legislation, including:

- a) Protection of Personal Information Act (“POPIA”); and
- b) Promotion of Access to Information Act (“PAIA”).

2. Personal Information We Collect

We collect and process personal information necessary to provide our financial services, including:

Category	Types of Information	Purpose of Processing	Lawful Basis
Identity Information	Full name, date of birth, identification numbers	Identity verification (KYC), fraud prevention, customer onboarding	Contractual necessity; Legal obligation; Legitimate interest
Contact Information	Residential and postal address; Email address and telephone numbers	Customer communication, account management, regulatory notifications	Contractual necessity; Legitimate interest
Financial Information	Income, expenses, assets and liabilities; Banking details and transactional data	Affordability assessments, credit risk analysis, loan servicing	Contractual necessity; Legal obligation; Legitimate interest
Credit Information	Credit history and repayment behaviour; Credit scores and reports	Creditworthiness assessments, responsible lending, risk management	Contractual necessity; Legal obligation (credit laws); Legitimate interest
Employment Information	Employer details, job title and income	Income verification, affordability assessment	Contractual necessity; Legitimate interest
Technical Information	IP address, device information; Website usage data and cookies	Platform security, fraud detection, analytics, service optimisation	Legitimate interest; Consent (for cookies where required)
Sensitive Information	Special personal information (only where applicable)	Compliance with legal obligations or specific service requirements	Explicit consent; Legal obligation

3. How We Collect Information

3.1 We collect personal information:

- Directly from you (applications, forms, communications)
- From third parties (credit bureaus, financial institutions, identity verification providers)

- Automatically through our digital platforms

4. Purpose Of Processing

4.1 We process personal information strictly for legitimate business purposes, including:

- Assessing creditworthiness and affordability
- Verifying identity and preventing fraud
- Providing and managing loan products
- Conducting collections and debt recovery
- Meeting legal and regulatory obligations
- Improving our services and customer experience

5. Disclosure Of Personal Information

5.1 We may disclose personal information to:

- Credit reporting bodies and credit providers
- Service providers (IT, cloud, analytics, payment processors)
- Debt collection agencies
- Regulators, courts, and law enforcement

All disclosures are limited to what is necessary and subject to appropriate safeguards.

6. Cross-Border Data Transfers

6.1 Personal information may be transferred outside the Republic of South Africa where necessary for operational purposes.

6.2 Such transfers will only occur where:

- The recipient is subject to laws, binding agreements, or corporate rules providing an adequate level of protection; or
- Appropriate safeguards are implemented in accordance with POPIA.

7. Data Retention

7.1 We retain personal information only for as long as necessary to:

- Fulfil the purposes outlined in this Policy
- Comply with legal, regulatory, and operational requirements

Retention periods vary depending on the nature of the information and applicable legal obligations.

8. Data Security

8.1 We implement appropriate technical and organisational measures to protect personal information, including:

- Encryption and secure systems
- Access controls and authentication

- Monitoring and incident response processes

9. Data Breach Management

9.1 We maintain procedures to detect, investigate and respond to data breaches. Where required by law, we will notify affected individuals and relevant regulators.

10. Direct Marketing

10.1 We may use personal information to provide information about our products and services.

10.2 You may opt out of marketing communications at any time by:

- Using unsubscribe mechanisms
- Contacting us directly

10.3 We will only engage in marketing practices where permitted by law.

11. Automated Decision-Making

11.1 We may use automated systems, including credit scoring models, to assess loan applications.

11.2 You may request further information about such decisions and, where applicable, request manual review.

12. Your Rights

12.1 You may have the right to:

- Access your personal information
- Request correction of inaccurate data
- Object to or restrict certain processing
- Withdraw consent (where processing is based on consent)
- Lodge complaints with relevant regulators

12.2 Specific rights are detailed in the applicable jurisdictional schedules.

13. Access To Information (PAIA)

13.1 Requests for access to records must be made in accordance with PAIA.

13.2 We maintain a PAIA Manual, which is available upon request.

14. Complaints

14.1 If you have concerns about how your personal information is handled, you may contact us.

14.2 If unresolved, complaints may be escalated to the Information Regulator of South Africa.

15. Governance And Updates

- **Policy Owner:** Head of Legal & Compliance
- **Approval:** Board
- **Review Cycle:** Annual

We may update this Policy from time to time. The latest version will be made available through our official channels.

16.Regulatory Contact Details

For all queries, requests, or complaints regarding the processing of personal or credit information, you may contact our designated officers as follows:

Information Officer

Diyuti Mohanlal

Diyuti@Mpowafin.co.za

0861 228 228

410 Jan Smuts Avenue, Craighall Park, Randburg, Unit 6 Burnside Island Office Park, Johannesburg, Gauteng