Privacy Policy

June 2026 | Version 1.0

We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.

1. Introduction

Welcome to our privacy policy. We are Paragon Finance (Pty) Ltd (2020/189492/07) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to tell you how we collect, use, store, share, and protect your personal information. This policy gives effect to our obligations under the Protection of Personal Information Act 4 of 2013 (POPIA). POPIA governs how we may collect, process, store, share, and delete your personal information.

The purpose of this policy is to describe the way that we handle your personal information.

2. Audience

This policy applies to visitors to our website and to customers who use our services. If you interact with us in any way – whether by browsing our website, submitting an enquiry, or using our financial services – this policy applies to you.

This policy covers anyone who visits our website or uses our services.

3. What is personal information?

Personal information means any information that identifies you, that can be used to identify you, or that relates to an identifiable person. Under POPIA, this is a broad concept.

It includes information we collect automatically when you visit our website, information you provide when you register or submit an enquiry, and additional information you give us voluntarily.

It does not include information that has been permanently and irreversibly de-identified or anonymised so that it cannot be linked to a specific person, or non-personal statistical information we compile.

3.1. Common examples

Examples of the types of personal information we may collect and process include your:

- **Identifying information** – such as your name, date of birth, or identity number;
- **Contact information** – such as your phone number or email address;
- **Address information** – such as your physical or postal address; and
- **Demographic information** – such as your gender or marital status.

3.2. Special personal information

POPIA affords heightened protection to certain categories of personal information. Depending on the services you require, we may also process:

- **Financial information** – such as your bank account details;
- **Sensitive demographic information** – such as your race or ethnicity; and
- **Criminal information** – such as information about any offence or related legal proceedings.

We will only process special personal information where we have a lawful ground to do so under POPIA.

4. Acceptance

Acceptance required

You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then you may not request our services.

Legal capacity

You may not access our website or request our services if you are younger than 18 years old or do not have the legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

You may not request our services if you do not accept this policy.

5. How do we collect personal information?

5.1. On submission of an enquiry or registration

When you submit an enquiry or register on our website, you will no longer be anonymous to us. We may collect your name and surname, email address, phone number, financial information, company details (including registration number and VAT number), physical or postal address, and account credentials. We will use this information to fulfil your account, provide services to you, and for any other purposes set out in this policy.

5.2. On request

When you request our services, you may be asked to provide us with additional information on a voluntary basis.

5.3. From browser

We automatically receive and record internet usage information from your browser, such as your IP address, browsing habits, click patterns, software version, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, and the pages you request. We use this information to improve and administer our website.

5.4. Cookies

For information on how we deal with cookies, please refer to our Cookie Policy.

6. Who do we process information about?

We process the personal information of customers, prospects, employees, suppliers, creditors, and debtors who interact with us in the course of our business.

We process the personal information of everyone who interacts with us in the course of our business.

7. Why we process personal information

We collect and process personal information only for specific, lawful purposes. We do not process personal information for purposes that are incompatible with those for which it was collected.

7.1. Financial services

We process personal information to provide our financial services, manage our contracts, process customer requests and complaints, keep our records current, better understand our customers' needs, and provide support.

7.2. Marketing

We process personal information to market our services to existing customers and prospects. We will not send you promotional or marketing messages unless you have opted in or we are otherwise entitled to do so.

7.3. Business purposes

We process personal information for internal purposes including managing employees, internal audit, accounting, business planning, due diligence, and proposed transactions such as joint ventures or disposals of business assets.

7.4. Legal and regulatory compliance

We process personal information to handle legal claims, enforce debts, and comply with our legal and regulatory obligations, including our obligations as a registered credit provider under the National Credit Act 34 of 2005.

7.5. Website usage

We may use your usage information to remember your preferences between visits, monitor website usage metrics, and track entries or submissions in any promotions or activities on our website.

We process your information to provide our services, conduct marketing, run our business, and comply with the law.

8. Lawful grounds for processing

POPIA requires us to have a lawful basis to process your personal information. Depending on the circumstances, we process your personal information on one or more of the following grounds:

- **Consent** – you have given us your specific, informed, and voluntary consent to process your information for a particular purpose;
- **Contractual necessity** – processing is necessary to enter into or perform a contract with you;

- **Legal obligation** – processing is required to comply with a legal obligation imposed on us by law; or
- **Legitimate interests** – processing is necessary for our legitimate interests, or those of a third party, where those interests are not outweighed by your rights and interests.

We will obtain your consent to collect personal information in accordance with POPIA where required.

9. Use

Where you interact with us through our website or ACSA app, we may use your information for:

9.1. Our obligations

We may use your personal information to fulfil our obligations to you.

9.2. Messages and updates

We may send administrative messages and email updates to you about our services. In some cases, we may also send you primarily promotional messages. You can choose to opt out of promotional messages.

We may use your information to send you administrative messages and email updates regarding our services, and for marketing purposes where lawful.

10. How we share personal information

10.1. Sharing

We may share your personal information with other divisions or companies within our group to provide joint services, with affiliates on the basis that they honour this policy, and with service providers under contract who assist with our business operations (including fraud prevention, billing, marketing, and technology services). We may also share information with credit bureaus as permitted by law. We do not sell your personal information, and no personal information will be disclosed to anyone except as provided in this policy.

10.2. Regulators

We may disclose your personal information as required by law or governmental audit.

10.3. Law enforcement

We may disclose personal information if required by a court order or subpoena, to comply with any applicable law, to protect the safety of any individual or the general public, or to prevent a violation of our customer relationship terms.

10.4. Marketing purposes

We may disclose aggregate statistics about our customer population in general terms to advertisers or business partners. Aggregate statistics do not identify any individual.

10.5. Employees

We may disclose personal information to our employees who need it to perform their functions, including management, human resources, accounting, audit, compliance, and information technology personnel.

10.6. Change of ownership

If we undergo a change in ownership, or a merger, acquisition, or sale of assets, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer in advance and the acquiring party will be required to honour this policy.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you. We never sell personal information. We may disclose personal information to third parties if required for legal reasons.

11. Security

There is no such thing as 'perfect security'. We have to balance increased levels of security against the convenience to you in transacting with us. We take the security of personal information very seriously and maintain reasonable measures to protect it from loss, misuse, unauthorised access, disclosure, alteration, or destruction.

Our website is hosted in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their responsibilities.

Phishing

You should only access our website through https://www.paragonfinance.co.za/. We will never ask you for your password by email. If you receive a suspicious communication that appears to come from us, do not click on any links and contact us directly.

Our security disclaimers
We will use all reasonable endeavours to ensure that our website and your information are not compromised. However, we cannot guarantee that no harmful code will enter our website. You should have regard to your own security by running appropriate anti-virus software and keeping it up to date.

If we become aware of a data breach that affects your personal information, we will notify you and the Information Regulator as required by POPIA as soon as reasonably practicable.

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

12. Accurate and current

We will try to keep the personal information we collect as accurate, current, complete, confidential, and reliable for the purposes defined in this policy. We may ask you from time to time to update your personal information. You are responsible for ensuring that the personal information you provide to us is accurate and current.

Please keep your personal information accurate and up to date by contacting us or updating it on our website.

13. Retention

We will only retain your personal information for as long as is necessary to fulfil the purposes set out in this policy. We may retain it for longer if retention is required or authorised by law, or if you have consented to extended retention. During any retention period, we will continue to protect your information and will not share or sell it. We may retain personal information in physical or electronic records at our discretion.

We will only retain your personal information for as long as is necessary.

14. Transfer to another country

We may transfer personal information outside of South Africa. We will only do so to countries that provide an adequate level of protection for personal information comparable to POPIA, or to recipients who have agreed to be bound by adequate data protection obligations.

15. Your rights

POPIA gives you a number of rights in relation to your personal information. You can exercise any of these rights by contacting us using the details in the Enquiries section below. We may need to verify your identity before we can fulfil any request.

15.1. Right of access

You may request access to your personal information and receive a copy of the personal information we hold about you.

15.2. Right to correct or update

You may correct or update the personal information you have provided to us by using the relevant menu on our website or by contacting us directly.

15.3. Right to withdraw consent or object

You may withdraw your consent where we are relying on consent as a lawful basis to process your information. You may also object to our processing where we are relying on another lawful basis. Please note that doing so may affect our ability to provide certain services to you.

15.4. Right to erasure

You may request that we delete or destroy personal information we hold about you where it is no longer necessary for the purposes for which we collected it, where you have withdrawn your consent and there is no other lawful ground for processing, or where the information was processed unlawfully.

15.5. Right to lodge a complaint

If you are not satisfied with how we handle your personal information, you have the right to lodge a complaint with the Information Regulator (South Africa) through their portal at https://eservices.inforegulator.org.za/.

You may update, remove, or request a copy of your personal information at any time. If you are unhappy with how we handle your information, you may lodge a complaint with the Information Regulator.

16. Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email. If you do not agree with the changes, you must stop using our services. If you continue to use our services after the notice period expires, you will be deemed to have accepted the updated policy.

17. Limitation

We are not responsible for, give no warranties in respect of, and make no representations about the privacy policies or practices of linked or third-party websites.

18. Children's privacy

Our website and services are not directed at children under the age of 13. We do not knowingly collect personal information from children under 13 without the consent of a parent or legal guardian. If you are a parent or guardian and you believe your child has provided us with personal information without your consent, please contact us using the details below so we can delete that information. If we become aware that we have collected personal information from a child under 13 without verifiable parental consent, we will take steps to remove that information from our records.

19. Enquiries

If you have any questions or concerns about this privacy policy or the way we handle personal information, please contact our Information Officer, Andrew MacPherson, at andrewmp@paragonfinance.co.za, by phone on 079 892 2010, or by post at 2nd Floor, 50 Harrington Street, District Six, Cape Town, 7925.