



**Virgin Money Privacy Policy: Website [www.virginmoney.co.za/www.creditscore.virginmoney.co.za](http://www.virginmoney.co.za/www.creditscore.virginmoney.co.za)**

We are committed to protecting your personal information. Not only is this required by law but we respect your privacy and want to ensure that we treat it appropriately at all times.

We may utilise your information to ensure that we provide you with products that are relevant to you.

References in this policy to “we”, “our” or “us” are references to Virgin Money (Proprietary) Limited. Reference to “you” and “your” mean each natural person who uses our website or associated services.

#### **TYPES AND SOURCES OF PERSONAL INFORMATION**

We may collect the following personal information about you and your dependants:

- **General Identifying Information:**  
Information that you give us when you interact with us in any way which may include your name, contact information, date of birth, identification number, financial information or financial history.
- **Financial information and account details**  
Payment card number; bank account number and account details; credit history and credit score; assets; income; and other financial information.
- **Telephone recordings**  
Recordings of telephone calls to our representatives and call centres.
- **Marketing preferences and customer feedback**  
You may let us know your marketing preferences, enter a contest or prize draw or other sales promotion, or respond to a voluntary customer satisfaction survey.
- **Credit Bureau Information and Credit Score**  
Your credit score, received from a credit bureau on your request.
- **Information to investigate crime, including fraud and money laundering**  
Organisations may share information about their previous dealings with customers for this purpose.
- **Partner Information**  
Information that we receive about you that is either publicly available or available through service providers that we may interact or partner with or that you may have provided your consent in respect of to share or that you may have provided to us previously when interacting with us for one of our other service offerings.
- **Product Enquiries**  
Information that you provide to us in respect of products or services that you may be interested in.

## HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use your personal information to:

- Obtain your credit score on your behalf from a credit bureau.
- Provide you with bespoke and tailor made financial services and products.
- Work with our service providers to inform you about financial products and services that may be of interest to you
- Notify you about changes to our services.
- Improve the service we offer you.
- Administer your account.
- Verify your identity.
- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies or products, other terms and conditions, our site and other administrative information.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- Carry out market research and analysis, including satisfaction surveys.
- Check your credit history.
- Check your details on applications for credit or credit related facilities.
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.
- Personalize your experience on our website by presenting information and advertisements tailored to you.
- Identify you to anyone to whom you send messages through the Website.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your personal information, so we suggest that you read these carefully.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.

- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Establish and defend legal rights; protect our operations or those of any of our group companies or business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.
- Please also see our Privacy Policies related to specific products and services that we offer.

#### **INTERNATIONAL TRANSFER OF PERSONAL INFORMATION**

Due to the global nature of our business, for the purposes set out above we may transfer personal information to parties located in other countries (including the United Kingdom, United States and other countries that have a different data protection regime than is found in the country where you are based). We may transfer information internationally to our group companies, service providers, business partners and governmental or public authorities.

#### **WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH**

We may make your personal information available to:

##### **Our group companies**

For a list of Virgin group companies that may have access to and use of personal information, please refer to <http://www.virgin.uk.com>. We are responsible for the management and security of jointly used personal information. Access to personal information Virgin Money is restricted to those individuals who have a need to access the information for our business purposes

##### **Other financial services providers**

In the course of marketing and providing our services, we may make personal information available to third parties such as related financial services providers, intermediaries and agents; appointed representatives; affinity marketing partners; financial institutions and credit reporting agencies.

##### **To comply with legal obligations including statutory and regulatory requirements**

We may be obliged by law to share your information.

##### **Other Third Parties**

We may share personal information with purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock.

personal information may also be shared by you, on message boards, chat, profile pages and blogs, and other services on the website to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public information, and may be available to visitors to the website and to the general public. We urge you to be very careful when deciding to disclose your personal information, or any other information, on the website.

## **PROTECTING YOUR INFORMATION**

We will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any personal information you might have with us has been compromised), please immediately notify us.

If we provide personal information to another service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the personal information.

## **RETENTION OF PERSONAL INFORMATION**

Reasonable steps will be taken to ensure that the personal information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Policy. Personal information will be retained for the period necessary to fulfil the purposes outlined in this Privacy Policy or unless a longer retention period is required or permitted by law.

If you wish to withdraw your consent to retain this information, your access to our services shall also be terminated or suspended. We shall remove your personal information from our database within a reasonable period but no longer than 7 (seven) business days.

## **MARKETING PREFERENCES**

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you.

If you no longer want to receive marketing-related e-mails from us, you may opt out of receiving these marketing-related communications by sending your opt out request to [INSERT].

We aim to comply with your opt out request(s) within a reasonable time period. Please note that if you opt out as described above, we will not be able to remove your personal information from the databases of third parties with whom we have already shared your personal information (i.e., to those to whom we have already provided your personal information as of the date on which we respond to your opt out request). Please also note that if you do opt out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt out.

## **OTHER INFORMATION THAT WE MAY COLLECT**

“Other Information” is any information that does not reveal your specific identity, such as:

- Browser information;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you; and

- Aggregated information
- **Through your internet browser:** Certain information is collected by most websites, such as your IP address (i.e., your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, time of the visit and the page(s) visited. We use this information for purposes such as calculating website usage levels, helping diagnose server problems, and administering the website.
- **Using cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and to collect information such as internet browser type, time spent on the website, pages visited, language preferences, etc. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the website, or to gather statistical information about the usage of the website. Cookies further allow us to present to you the advertisements or offers that are most likely to appeal to you. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites.

One of the advertisement companies that we use is Google, Inc, trading as DoubleClick. To opt out from the DoubleClick advertisement cookie please visit:[www.doubleclick.com/privacy/index.aspx](http://www.doubleclick.com/privacy/index.aspx). You can refuse to accept other cookies we use by adjusting your browser settings. However, if you do not accept these cookies, you may experience some inconvenience in your use of the website and some online products.

- **Using pixel tags, web beacons, clear GIFs or other similar technologies:** These may be used in connection with some website pages and HTML-formatted e-mail messages to, among other things, track the actions of website users and e-mail recipients, measure the success of our marketing campaigns and compile statistics about website usage and response rates.

We use Adobe's Omniture analytics service, which uses cookies and web beacons to help us understand more about how our website is used by consumers so we can continue to improve it. Adobe does not have the right to use the information we provide to them beyond what is necessary to assist us. For more information on Adobe's Omniture service, including how to Opt out, go to <http://www.omniture.com/privacy/policy#optout>.

- **From you:** Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with personal information, this information does not personally identify you.
- **By aggregating information:** We may aggregate and use certain information (for example, we may aggregate information to calculate the percentage of our users who have a particular telephone area code).

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as personal information under applicable law, then, in addition to the uses listed in the "*Other Information We Collect*" section above, we may use and disclose Other Information for all the purposes for which we use and disclose personal information.

**THIRD PARTY WEBSITES**

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website to which this website contains a link. The inclusion of a link on the website does not imply endorsement of the linked website by us or by our group companies.

**MINORS**

The website is not directed to individuals under the age of eighteen, and we request that these individuals do not provide personal information through the website.

**CHANGES TO THIS PRIVACY POLICY**

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website.

**REQUESTING A COPY OF YOUR PERSONAL INFORMATION**

Please contact us on [INSERT] if you wish to check if we hold information about you and the the details thereof if we do. Kindly see our PAIA manual for more information in this regard.