



Last Updated: 23 June 2021

Privacy Policy in terms of The Protection Of Personal Information Act

1. Contact

If you have any questions about this Privacy Policy, you can contact Maverick Financial Services:

- 1.1. Name of Business: Maverick Financial Services
- 1.2. Contact: Mr Marc Toussaint
- 1.3. Postal Address: Post Net Suite 1466, P/Bag X153, Bryanston, 2021
- 1.4. Physical Address: 181 Longleat Avenue, Chartwell Country Estates, Fourways 2191
- 1.5. Phone Number: +27-(0)11-022-3165
- 1.6. Fax Number: +27-(0)86-631-8568
- 1.7. Email Address: info@maverickfinancial.co.za
- 1.8. Website: www.maverickfinancial.co.za

2. Introduction

- 2.1. The Protection of Personal Information Act No. 4 of 2013 (POPI) was introduced to promote the protection of personal information processed by public and private bodies and to introduce certain conditions and to establish minimum requirements for the processing of personal information and to provide for the rights of persons regarding unsolicited electronic communications and automated decision making as well as to regulate the flow of personal information across the borders of the Republic of South Africa and to provide for matters connected therewith.
- 2.2. The Protection of Personal Information Act gives effect to section 14 of the Constitution of the Republic of South Africa, 1996, which provides that everyone has the right to privacy which right includes a right to protection against the unlawful collection, retention, dissemination and use of personal information.
- 2.3. A "private body" is defined as any natural person who carries or has carried on any trade, business, or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).



- 2.4. **Maverick** falls within the definition of a "private body" and this Policy has been compiled in accordance with the Protection of Personal Information Act and other applicable legislation.
- 2.5. This Privacy Policy describes the policies and procedures on the collection, use, and disclosure of the user information when the user uses the website and tells users about their privacy rights and how the law protects them.
- 2.6. **Maverick** uses the user Personal data to provide and improve the website. By using the website, users agree to the collection and use of information in accordance with this Privacy Policy.

3. INTERPRETATION AND DEFINITIONS

4. The following terms have meanings defined under the following conditions, and where applicable the singular shall have the same meaning as the plural:
 - 4.1. **Account** - a unique account created for the user to access the **Maverick** website or parts of the **Maverick** website.
 - 4.2. **Cookies** - are text files that are placed on the user computer, mobile device or any other device by a website that contain small pieces of data — like a username, password and the details of the user browsing history on that website.
 - 4.3. **Country** – Republic of South Africa
 - 4.4. **Device** -any device that can access the website such as a computer, a cellphone or a digital tablet.
 - 4.5. **Maverick** – means Maverick Financial Services located at 181 Longleat Avenue, Chartwell Country Estates, Fourways 2191
 - 4.6. **Personal Data** - is any information that relates to an identified or identifiable individual.
 - 4.7. **Usage Data** - data collected automatically, either generated by the use of the website or from the website infrastructure itself (for example, the duration of a page visit).
 - 4.8. **Website** - www.maverickfinancial.co.za
 - 4.9. **Website Provider** - any natural or legal person who processes the data on behalf of **Maverick**. It refers to third-party companies or individuals employed by **Maverick** to facilitate the website, to provide the website on behalf of **Maverick**, to perform services related to the website, or to assist **Maverick** in analyzing how the website is used.
 - 4.10. **User** - the individual accessing or using the website, or the company, or other legal entity on behalf of which such individual is accessing or using the website, as applicable.



5. Collecting and Using User Personal Data

5.1. Types of Data Collected

5.1.1. Personal Data

5.1.1.1. While using the **Maverick** website, **Maverick** may ask the user to provide it with certain personally identifiable information that can be used to contact or identify the user. Personally identifiable information may include, but is not limited to:

- 5.1.1.1.1. Name;
- 5.1.1.1.2. Surname;
- 5.1.1.1.3. Email;
- 5.1.1.1.4. Contact number;
- 5.1.1.1.5. Usage Data;

5.1.2. Usage Data

- 5.1.2.1. Usage Data is collected automatically when using the website.
- 5.1.2.2. Usage Data may include information such as the user Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of the **Maverick** website that the user visit, the time and date of the user visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- 5.1.2.3. When the user accesses the website by or through a mobile device, **Maverick** may collect certain information automatically, including, but not limited to, the type of mobile device the user uses, the user's mobile device unique ID, the IP address of the user's mobile device, the user's mobile operating system, the type of mobile Internet browser the user uses, unique device identifiers and other diagnostic data.
- 5.1.2.4. **Maverick** may also collect information that the user's browser sends whenever the user visits the **Maverick** website or when the user accesses the website by or through a mobile device.

5.2. Tracking Technologies and Cookies

5.2.1. **Maverick** use Cookies and similar tracking technologies to track the activity on the **Maverick** website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze the **Maverick** website. The technologies **Maverick** use may include:



- 5.2.1.1. **Cookies or Browser Cookies.** A cookie is a small file placed on the user Device.
- 5.2.1.2. **Flash Cookies.** Certain features of the **Maverick** website may use local stored objects (or Flash Cookies) to collect and store information about the user preferences or the user activity on the **Maverick** website.
- 5.2.1.3. **Web Beacons.** Certain sections of the **Maverick** website and the **Maverick** emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit **Maverick**, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).
- 5.2.1.4. **Cookies** can be "**Persistent**" or "**Session**" Cookies. Persistent Cookies remain on the user's personal computer or mobile device when the user goes offline, while Session Cookies are deleted as soon as the user closes its web browser.
- 5.2.2. **Maverick** use both Session and Persistent Cookies for the purposes set out below:
 - 5.2.2.1. **Necessary / Essential Cookies**
 - 5.2.2.1.1. **Type:** Session Cookies
 - 5.2.2.1.2. **Administered by:** **Maverick**
 - 5.2.2.1.3. **Purpose:** These Cookies are essential to provide the user with services available through the Website and to enable the user to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the websites that the user has asked for cannot be provided, and **Maverick** only uses these Cookies to provide the user with those websites.
 - 5.2.2.2. **Cookies Policy / Notice Acceptance Cookies**
 - 5.2.2.2.1. **Type:** Persistent Cookies
 - 5.2.2.2.2. **Administered by:** **Maverick**
 - 5.2.2.2.3. **Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.
 - 5.2.2.3. **Functionality Cookies**
 - 5.2.2.3.1. **Type:** Persistent Cookies
 - 5.2.2.3.2. **Administered by:** **Maverick**



- 5.2.2.3.3. **Purpose:** These Cookies allow **Maverick** to remember choices the user makes when the user uses the Website, such as remembering the user login details or language preference. The purpose of these Cookies is to provide the user with a more personal experience and to avoid the user having to re-enter the user preferences every time the user uses the Website.

6. Use of the user Personal Data

6.1. **Maverick may use Personal Data for the following purposes:**

- 6.1.1. To provide and maintain the **Maverick** website, including monitoring the usage of the **Maverick** website.
- 6.1.2. To manage the user Account: to manage the user registration as a user of the website. The Personal Data the user provide may give the user access to different functionalities of the website that are available to the user as a registered user.
- 6.1.3. For the performance of a contract: the development, compliance and undertaking of the service contract for the services the user has purchased or of any other contract with **Maverick** through the website or other means.
- 6.1.4. To contact the user: To contact the user by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted websites, including the security updates, when necessary or reasonable for their implementation.
- 6.1.5. To provide the user with news, special offers and general information about other goods, websites and events that **Maverick** offer that is similar to those that the user has already purchased or enquired about unless the user has opted not to receive such information.
- 6.1.6. To manage the user requests: To attend and manage the user requests to **Maverick**.
- 6.1.7. For business transfers: **Maverick** may use the user information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the **Maverick** assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by **Maverick** about the **Maverick** website users is among the assets transferred.
- 6.1.8. For other purposes: **Maverick** may use the user information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of the **Maverick** promotional campaigns and evaluating and improving the **Maverick** website, products, websites, marketing and the user experience.
- 6.1.9. For performing financial or other services on behalf of the user and/or for the purpose of carrying out the functions of the **Maverick**.



6.2. **Maverick may share the user personal information in the following situations:**

- 6.2.1. **With website Providers:** **Maverick** may share the user personal information with website Providers to monitor and analyse the use of the **Maverick** website;
- 6.2.2. **To contact the user;**
- 6.2.3. **For business transfers:** **Maverick** may share or transfer the user personal information in connection with, or during negotiations of, any merger, sale of **Maverick** assets, financing, or acquisition of all or a portion of the **Maverick** business to another company;
- 6.2.4. **With Affiliates:** **Maverick** may share the user information with the **Maverick** affiliates, in which case **Maverick** will require those affiliates to honour this Privacy Policy. Affiliates include the **Maverick** parent company and any other subsidiaries, joint venture partners or other companies that **Maverick** controls or that are under common control with **Maverick**.
- 6.2.5. **With business partners:** **Maverick** may share the user information with the **Maverick** business partners to offer the user certain products, websites or promotions.
- 6.2.6. **With other users:** when the user shares personal information or otherwise interacts in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- 6.2.7. **With directors, members, consultants and employees of Maverick:** when directors, members, consultants and employees conduct the business of **Maverick**, personal information will be shared in order to conduct the business of **Maverick**.
- 6.2.8. **With the user consent:** **Maverick** may disclose the user's personal information for any other purpose with the user's consent.

6.3. **Retention of the user Personal Data**

- 6.3.1. **Maverick** will retain the user Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. **Maverick** will retain and use the user Personal Data to the extent necessary to comply with **Maverick's** legal obligations (for example, if **Maverick** is required to retain the user data to comply with applicable laws), resolve disputes, and enforce the **Maverick** legal agreements and policies.
- 6.3.2. **Maverick** will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of the **Maverick** website, or **Maverick** is legally obligated to retain this data for longer periods.



6.4. Transfer of the user Personal Data

- 6.4.1. the user information, including Personal Data, is processed at **Maverick's** operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of the user state, province, country or other governmental jurisdiction where the data protection laws may differ from the user's jurisdiction.
- 6.4.2. the user consents to this Privacy Policy. The user's submission and/or transmission and/or delivery of such information represents the user's agreement to that transfer.
- 6.4.3. **Maverick** will take all steps reasonably necessary to ensure that the user data is treated securely and in accordance with this Privacy Policy and no transfer of the user Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of the user data and other personal information.

7. Disclosure of the user Personal Data

7.1. Business Transactions

- 7.1.1. If **Maverick** is involved in a merger, acquisition or asset sale, the user Personal Data may be transferred. **Maverick** will provide notice before the user Personal Data is transferred and becomes subject to a different Privacy Policy.

7.2. Law enforcement

- 7.2.1. Under certain circumstances, **Maverick** may be required to disclose the user Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

7.3. Other legal requirements

- 7.3.1. **Maverick** may disclose the user Personal Data in the good faith belief that such action is necessary to:
 - 7.3.1.1. Comply with a legal obligation;
 - 7.3.1.2. Protect and defend the rights or property of **Maverick**;
 - 7.3.1.3. Prevent or investigate possible wrongdoing in connection with the website;
 - 7.3.1.4. Protect the personal safety of users of the website or the public;
 - 7.3.1.5. Protect against legal liability;



8. Security of the user Personal Data

- 8.1. The security of the user Personal Data is important to **Maverick**, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While **Maverick** strives to use commercially acceptable means to protect the user Personal Data, **Maverick** cannot guarantee its absolute security.

9. Children's Privacy

- 9.1. the **Maverick** website does not address anyone under the age of 18. **Maverick** does not knowingly collect personally identifiable information from anyone under the age of 18. If the user is a parent or guardian and the user is aware that the user's child has provided **Maverick** with Personal Data, please contact **Maverick**. If **Maverick** becomes aware that **Maverick** has collected Personal Data from anyone under the age of 18 without verification of parental consent, **Maverick** will take steps to remove that information from the **Maverick** servers.
- 9.2. If **Maverick** needs to rely on consent as a legal basis for processing the user information and the user country requires consent from a parent, **Maverick** may require the user's parent's consent before **Maverick** collects and uses that information.

10. Links to Other Websites

- 10.1. the **Maverick** website may contain links to other websites that are not operated by **Maverick**. If the user clicks on a third party link, the user will be directed to that third party's site. **Maverick** strongly advise the user to review the Privacy Policy of every site the user visits.
- 10.2. **Maverick** has no control over and assumes no responsibility for the content, privacy policies or practices of any third party sites or websites.

11. Changes to this Privacy Policy

- 11.1. **Maverick** may update the **Maverick** Privacy Policy from time to time. **Maverick** will notify the user of any changes by posting the new Privacy Policy on this page.
- 11.2. **Maverick** will let the user know via email and/or a prominent notice on the **Maverick** website, prior to the change becoming effective and update the "Last Updated" date at the top of this Privacy Policy.
- 11.3. Users are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.