

Data Protection Policy

For the website **creditomax.co.za**

Effective date: 1 September 2026

Creditomax OÜ (private limited company (osaühing), reg. no. 17026392, VAT no. EE102757044, with registered address at Endla tn 4, 10142, Kesklinna linnaosa, Tallinn, Harju maakond, Estonia) (hereinafter "we", "us", "Creditomax OÜ") is committed to treating you, the user of our website located at **creditomax.co.za** (hereinafter, the "Website"), with the utmost privacy, security, and confidentiality regarding information freely provided by you through the forms available on the Website. The principles and legal basis for collecting and processing your data are set out in this Data Protection Policy (the "Policy").

This document contains the legal provisions and references governing the conditions under which the Website collects, manages, and retains the personal data of users who access, browse, and use the Website. It also sets out the rights of users and our obligations in relation to the processing of personal data.

Purpose of this Policy

The purpose of this Policy is to explain how we collect, use, and disclose your personal data, and what rights you have in relation to that data.

Applicable legal frameworks

Creditomax OÜ is established in Estonia, a member state of the European Union. Accordingly, the processing of your personal data is governed by two legal frameworks, applied together:

- **The General Data Protection Regulation (EU) 2016/679 ("GDPR")**, which applies to us as a controller established in the EU, irrespective of the location of the data subject (Art. 3(1) GDPR);
- **The Protection of Personal Information Act 4 of 2013 ("POPIA")**, which applies on the basis that the Website is directed at, and processes personal information of, users located in South Africa.

Where the two frameworks differ, we apply whichever standard affords you greater protection.

Legal basis for processing

- **Your consent** (Art. 6(1)(a) GDPR; Section 11(1)(a) POPIA), for disclosing your personal data to partner loan providers, for the purpose of identifying and managing loan offers tailored to your profile. This consent is collected separately, as set out in our Consent Forms.
- **Our legitimate interest** (Art. 6(1)(f) GDPR; Section 11(1)(f) POPIA), for improving user experience and preventing fraud and misuse of the Website.
- **Compliance with legal obligations** (Art. 6(1)(c) GDPR; Section 11(1)(d) POPIA), where applicable.
- **Performance of the product-matching service** (Art. 6(1)(b) GDPR; Section 11(1)(b) POPIA), for sending informational SMS and/or email messages containing the results of the product-matching process, identifying loan offers tailored to your profile. These messages are sent, as a general rule, within approximately 24 hours of receipt of your application and form an integral part of the service provided to you. They are informational in nature and do not constitute marketing or commercial communications.

What data do we collect?

The following is the current and complete list of personal data collected on this Website. We do not currently collect employment, income, banking, vehicle, or third-party contact data.

First name
Last name
Email address
Phone number
ID number
Gender
Date of birth

Sources of personal data

- Directly from you, through the forms available on the Website;
- Third-party websites dedicated to generating offers in connection with financial services, including those offered by us;
- Automatically, through analytics tools (Google Analytics or equivalent tools used on the Website).

Cookies and similar technologies

The Website uses cookies and similar technologies for its essential operation, for the statistical analysis of browsing activity, and, where you have given your consent, for advertising purposes. When you first visit the Website, you are presented with a cookie banner allowing you to accept or reject non-essential cookies.

Automated decision-making

Based on the information you provide, we may compare your data against the criteria set by partner loan providers, in order to identify those providers with the best chances of approval. Given the limited data currently collected on this Website, this comparison is correspondingly limited in scope. The outcome should not be regarded as determinative of your actual chances of obtaining a loan. You have the right to request human intervention, to express your point of view, and to contest the decision.

Who has access to your personal data?

- Partner loan providers and financial institutions;
- Email and SMS service providers;
- Analytics service providers;
- Auditors and competent authorities, in compliance with legal obligations.

Where we disclose your data to South African loan providers, appropriate cross-border transfer safeguards apply as required under GDPR Chapter V.

Retention period

We retain your personal data for as long as necessary to fulfil the purpose for which it was collected. We may retain your data for 3 (three) years after the end of our relationship with you, to protect our rights, and for up to 10 (ten) years in relation to potential claims arising from our interaction, subject to the applicable limitation periods.

Your rights

You have the right to: access your personal data; obtain a copy of it; request its correction or deletion; restrict or object to its processing, including for direct marketing purposes; request data portability; and lodge a complaint with a competent supervisory authority — in South Africa, the Information Regulator; in respect of our processing as an EU-established controller, the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon) or another competent EU supervisory authority.

To exercise these rights, you may contact us using the details set out below.

Contact

For any query regarding the processing of your personal data, you may contact us at: contact@creditomax.co.za

This Policy is effective as of 1 September 2026.