

OCTAGON BUSINESS SOLUTIONS

Privacy Notice

Octagon Business Solutions (Pty) Ltd

Issued in compliance with the Protection of Personal Information Act 4 of 2013

Version	1.0
Effective date	2026-05-07
Replaces	All prior privacy notices issued by Octagon, including any system-specific notice for Limitless
Owner	Information Officer, Octagon Business Solutions (Pty) Ltd
Next review	12 months from effective date

1. About this notice

Octagon Business Solutions (Pty) Ltd (registration number 1997/012540/07) ("Octagon", "we", "us") is committed to protecting the privacy of every person whose personal information is processed by, or through, the systems and services we operate.

This notice is issued in compliance with section 18 of the Protection of Personal Information Act 4 of 2013 ("POPIA") and explains: who we are; what personal information we process; why we process it; who we share it with (including transfers across borders); how long we keep it; your rights as a data subject; and how to contact us or complain.

Octagon operates several systems, each touching different categories of personal information and giving rise to different roles under POPIA. Section 3 of this notice lists each system and identifies the role we play in respect of it. Where we act as an Operator on behalf of a client (the "Responsible Party"), this notice supplements but does not replace that client's own privacy notice; in those instances, the Responsible Party's notice governs the relationship between that party and the data subject.

2. Who we are and how to contact us

Octagon Business Solutions (Pty) Ltd is a private company duly incorporated in the Republic of South Africa. Octagon is registered with the National Credit Regulator as a Reseller Credit Bureau under registration number NCRCB42. Octagon is not a registered credit provider.

Registered office

Building 1, First Floor Left, Fancourt Office Park,
Cnr Northumberland & Felstead Road,
Northriding, Johannesburg, 2188

Information Officer

Antony Erwin Ferguson, Managing Director ·
tonyf@octagon.co.za · +27 82 464 6018

Deputy Information Officer

Rethabile (Billy) Mabelane, Director of Operations
· billy@octagon.co.za

General data-protection enquiries

popia@octagon.co.za (or via the contact details
above)

3. Our systems and the role we play in each

Octagon operates the following systems. The role identified in each sub-section determines which obligations under POPIA fall on Octagon directly, and which fall on a third party for whom we are acting.

3.1 Limitless — loan management platform

Limitless is the loan management system used by our microlender and business clients (each, an "Originator") to manage their lending operations end-to-end. Through Limitless, an Originator captures loan applications, manages account records, processes payments, communicates with consumers, and reports on its book.

In respect of Limitless, Octagon acts as Operator on behalf of each Originator. The Originator is the Responsible Party in respect of its own consumer-base. Octagon processes personal information only on the Originator's instructions and only for the purposes set out in this notice and in the Originator's privacy notice.

Limitless includes the Limitless Marketplace — a feature through which an Originator may, with the consumer's contemporaneous and granular consent captured at the point of referral, refer or sell specific consumer accounts to one of Octagon's channel or service partners. The Marketplace is described in section 8 below.

- Hosting: South Africa (Xneelo, Johannesburg).
- Outgoing email dispatch: Twilio Inc. (Sendgrid), United States — see section 9.
- Octagon's role: Operator (POPIA s.20–21).

3.2 FrontierLMS — vetting and loan origination

FrontierLMS is Octagon's vetting and loan-origination platform. It is used by certain credit-provider and microlender clients during the application and origination phase of a loan, before the resulting account is transitioned to Limitless for ongoing management. FrontierLMS includes automated credit-profile pulling through integrations with authorised source credit bureaux.

In respect of FrontierLMS, Octagon acts as Operator on behalf of the credit provider that is performing the vetting and origination. The credit provider is the Responsible Party in respect of its own applicants and consumer-base.

FrontierLMS production data is hosted in the Republic of South Africa. The FrontierLMS source code is hosted on Microsoft Azure infrastructure that may include processing outside the Republic of South Africa. The source code does not contain personal information of consumers; nevertheless, this position is recorded for transparency.

- Hosting (production data): South Africa.
- Hosting (source code): Microsoft Azure (multi-region; configurable to RSA region where contractually required).
- Bureau integrations: integrations with authorised source bureaux for credit-profile retrieval — see section 3.3 (Credit Office) and the source bureaux's own privacy notices.
- Octagon's role: Operator.

3.3 Credit Office — reseller credit bureau (NCRCB42)

Credit Office is Octagon's reseller credit bureau service, operated under National Credit Regulator registration NCRCB42. Credit Office is offered to our credit-provider, microlender, and business clients as a self-service portal through which they obtain commercial and consumer credit reports from authorised source bureaux (including Experian, TransUnion, and XDS) for purposes permitted under the National Credit Act 34 of 2005 (the "NCA").

Where you are the subject of a credit search performed through Credit Office, the Responsible Party for that search is the credit provider that initiated it, and the source of the underlying data is the source bureau named in the report. Octagon's role is limited to operating the reseller infrastructure that processes the search on behalf of the credit provider, and to onward retransmission of the bureau's data within the framework of our reseller registration with the NCR.

Octagon retains in its systems only such data as is necessary for the temporary processing of the search. Consumer credit reports retrieved through Credit Office are automatically deleted from Octagon's systems within 72 hours of retrieval, in compliance with the Reseller Credit Bureau Regulations made under the NCA. Commercial credit reports are retained by Octagon for 3 months from retrieval, reflecting their validity period.

Consumers being searched will not, in the ordinary course, interact with Credit Office directly. Where you wish to access, correct, or dispute information about you, you should contact: (i) the credit provider that performed the search (in respect of the purpose and lawfulness of the search itself); or (ii) the relevant source bureau (in respect of the underlying data on the consumer credit record). The credit provider is required by section 72 of the NCA to facilitate this contact.

- Hosting: South Africa.
- Source data: authorised source credit bureaux (Experian, TransUnion, XDS, and others as updated from time to time).
- Octagon's role: Operator on behalf of the credit provider performing the search; reseller credit bureau under NCRCB42 in respect of the bureau-to-credit-provider distribution chain.
- Retention: consumer credit reports — 72 hours (automated); commercial credit reports — 3 months.

3.4 SACRRA DMA — credit-data submission infrastructure

Octagon operates the Data Management Agreement ("DMA") infrastructure for the South African Credit and Risk Reporting Association ("SACRRA"). The DMA is the framework through which credit providers submit consumer credit-account data to credit bureaux for inclusion in the bureaux's records.

In respect of the SACRRA DMA, the Responsible Party is SACRRA (acting in concert with its participating credit-provider members), and Octagon acts as Operator. Octagon processes personal

information submitted via the DMA only on SACRRA's instructions and in accordance with the SACRRA DMA framework.

Where you wish to access, correct, or dispute information that has been submitted into the SACRRA DMA about you, you should contact SACRRA directly, or the credit provider that submitted the information. SACRRA's contact details are available at www.sacrra.org.za.

- Hosting: South Africa.
- Octagon's role: Operator on behalf of SACRRA.

3.5 Octagon website and general corporate processing

Octagon operates the website at www.octagon.co.za and processes personal information of website visitors, prospective clients, current clients (their contact persons), suppliers, professional advisors, and employees, in the ordinary course of running our business.

In respect of this processing, Octagon acts as Responsible Party in its own right.

4. Personal information we process

Across the systems described in section 3, the categories of personal information processed include:

- Identity and contact information — full name, identification or passport number, date of birth, gender; residential and postal address, email address, mobile and landline numbers; employer name and place of employment.
- Loan and account information — loan applications, agreements, repayment schedules, balances, payment history, arrears status, outcome codes; bank-account details for debit-order and payment instructions.
- Credit-bureau information — commercial and consumer credit reports retrieved through Credit Office (for the periods described in section 3.3); credit-account data submitted through the SACRRA DMA.
- Communication and platform-usage data — emails dispatched through our systems (statements, demands, notifications), login credentials, audit logs, IP addresses, device identifiers, and other technical data necessary for security and compliance.
- Marketplace consent records — where the Limitless Marketplace is used, the consumer's affirmative consent (timestamp, IP address, user-agent, exact wording shown).
- Corporate-relationship data — business contact details, professional credentials, communications, and payment history of clients, suppliers, and advisors.
- Employment data — for current and former employees of Octagon, the personal information necessary for employment, payroll, statutory reporting, and post-employment record-keeping.

Octagon does not actively solicit special personal information (as defined in section 26 of POPIA). Where such information is incidentally provided, it is processed only to the extent necessary for the relevant purpose and on an applicable lawful basis.

5. Where we collect personal information from

We collect personal information from the following sources:

- directly from the consumer or other data subject, where they interact with one of our systems or with us directly;
- from the Originator, credit provider, or other client on whose behalf we operate the relevant system;
- from regulated source credit bureaux (Experian, TransUnion, XDS, and others as updated from time to time), where a credit provider has lawfully requested information through Credit Office;
- from SACRRA, in respect of credit-account data submitted into the DMA framework by participating credit providers;
- from publicly available sources, where lawful and proportionate;
- from service providers and channel partners (described in section 7) in the form of return data — for example, call outcomes, payment promises, and trace results; and
- from website visitors and contact-form submissions on www.octagon.co.za.

6. Why we process personal information (purposes and lawful bases)

Octagon processes personal information for the following purposes, on the lawful bases shown:

Purpose	Primary lawful basis (POPIA s.11)
Operating the Limitless platform on behalf of Originators	Performance of contract with Originator (s.11(1)(b)); legitimate interests (s.11(1)(f))
Operating FrontierLMS on behalf of credit-provider clients during loan vetting and origination	Performance of contract; legitimate interests
Operating Credit Office and providing reseller credit-bureau services to clients under NCRCB42	Compliance with law (NCA, s.11(1)(c)); performance of contract
Operating the SACRRA DMA infrastructure on behalf of SACRRA	Performance of contract with SACRRA
Sending transactional emails (statements, demand letters, account notifications) on behalf of Originators and credit providers	Performance of the underlying loan/credit contract; legitimate interests
Marketplace channel-partner referrals (collections,	Consumer consent captured at the point of referral

debt sale, tracing, legal handover) — where the Limitless Marketplace is used	(s.11(1)(a)); legitimate interests where applicable
Compliance with the National Credit Act 34 of 2005 and the obligations of a Reseller Credit Bureau	Compliance with law
Detection and prevention of fraud, money laundering, and other unlawful activity (FICA where applicable)	Compliance with law; legitimate interests
Internal record-keeping, audit, dispute resolution, and regulatory reporting	Compliance with law; legitimate interests
Business development, prospect engagement, and relationship management	Legitimate interests; consent where applicable
Employment, payroll, and statutory employee reporting	Performance of the employment contract; compliance with law

7. Who we share personal information with

Octagon shares personal information only as necessary for the purposes set out in this notice, and only with parties that are subject to confidentiality and data-protection obligations no less protective than those required by POPIA. Categories of recipient are set out below.

7.1 Service providers (Operators acting on Octagon's behalf)

Provider	Service	Country
Xneelo (Pty) Ltd	Hosting and infrastructure (Limitless, FrontierLMS production, Credit Office, SACRRA DMA)	South Africa
Microsoft Corporation (Microsoft 365 / Azure)	Productivity, supporting cloud services, FrontierLMS source-code hosting	Multiple — configurable to RSA region for production data; multi-region for source code
Twilio Inc. (Sendgrid)	Transactional email delivery on Octagon's behalf	United States of America

Each service provider is engaged under a written contract that imposes confidentiality and security obligations and that limits processing to Octagon's instructions. Cross-border transfers are addressed in section 9.

7.2 Channel and service partners (Limitless Marketplace)

Where an Originator elects to engage one of Octagon's channel or service partners through the Limitless Marketplace, Octagon may transfer to that partner the personal information necessary for the requested service. Such transfers occur only with the consumer's affirmative consent captured at the point of referral, or on another lawful basis recorded in the Originator's own privacy notice. Current channel and service partners include:

- Nimble Credit Solutions (Pty) Ltd — outsourced call-centre and collections services; debt purchase; tracing; legal collections handover.

Where the partner provides the service as Operator on the Originator's behalf (for example, the call-centre stream), the partner processes personal information only on instruction and may not use it for any other purpose. Where the partner becomes Responsible Party in its own right (for example, on outright debt sale), the partner assumes independent responsibility under POPIA from the moment of transfer and is required to issue its own privacy notice to affected consumers.

7.3 Source credit bureaux (Credit Office)

Where a credit provider performs a search through Credit Office, personal information is exchanged with the relevant source credit bureau (Experian, TransUnion, XDS, or other authorised source bureau as updated from time to time). The source bureau is the original holder of the bureau record and is the Responsible Party in respect of that record. Each source bureau publishes its own privacy notice.

7.4 SACRRA

Personal information submitted into the SACRRA DMA infrastructure is processed by Octagon as Operator on behalf of SACRRA. SACRRA is the Responsible Party for the DMA. Octagon does not control the inclusion or onward distribution of any record submitted into the DMA.

7.5 Originators, credit providers, and authorised users

Personal information is shared with the Originator or credit provider on whose behalf Octagon operates the relevant system, and with the Originator's or credit provider's authorised users in accordance with the access controls configured by that party.

7.6 Regulators and law-enforcement authorities

Octagon may share personal information with the Information Regulator, the National Credit Regulator, the South African Revenue Service, the Financial Intelligence Centre, the South African Police Service, and other regulators and authorities, where required by law or where reasonably necessary to comply with a lawful directive or to prevent or investigate unlawful activity.

7.7 Professional advisors and successors

Octagon may share personal information with its auditors, attorneys, and other professional advisors under professional confidentiality, and with any successor entity in connection with a sale, merger, or restructure of Octagon's business.

8. The Limitless Marketplace — specific disclosures

The Limitless Marketplace is a feature of the Limitless platform through which an Originator may, with the consumer's contemporaneous and granular consent, refer or transfer specific consumer accounts to a channel or service partner (such as Nimble Credit Solutions) for collections, debt sale, tracing, or related services.

When an Originator uses the Marketplace:

- the Originator presents the consumer with a clear, plain-language consent message identifying the partner, the purpose of the transfer, the categories of personal information to be transferred, and the consumer's right to refuse or withdraw consent;
- the consumer's affirmative consent (and the timestamp, IP address, user-agent, and exact wording shown) is recorded by Octagon as part of the audit trail;
- until consent is captured, no personal information of the relevant consumer is visible to or accessible by the partner;
- the partner's view of the Marketplace is technically ring-fenced to opted-in consumer records only;
- where the partner becomes Responsible Party in its own right (for example, on outright debt sale), the partner is required to provide its own privacy notice to the consumer and assumes independent obligations under POPIA from the moment of transfer.

9. Cross-border transfers of personal information

Octagon's production data is stored in the Republic of South Africa. The principal cross-border transfers that occur in the ordinary course of business are:

- Transactional email — dispatched through Twilio Inc. (Sendgrid), a United States entity. The transfer is conducted on the basis of section 72(1)(a) of POPIA, namely a binding agreement (the Twilio Data Processing Addendum and Standard Contractual Clauses) entered into between Octagon and Twilio Inc., that imposes on Twilio obligations to protect personal information at a level substantially similar to that required by POPIA.
- Cloud productivity services — provided by Microsoft Corporation, with multi-region processing configurable to the RSA region for production data. Where any cross-border processing

occurs, it is conducted on the basis of section 72(1)(a) of POPIA, supported by Microsoft's Data Protection Addendum and standard contractual clauses.

- FrontierLMS source-code hosting — Microsoft Azure infrastructure may include processing outside the Republic of South Africa. The source code does not contain personal information of consumers; this position is recorded for transparency.

Where Octagon proposes to transfer personal information to a recipient outside the Republic of South Africa other than as described above, the transfer will only occur where one or more of the gateways in section 72 of POPIA is satisfied — for example, the data subject's consent, the necessity of the transfer for the performance of a contract with the data subject, or another binding instrument that imposes substantially similar protections.

10. How long we keep personal information

Octagon retains personal information only for as long as is necessary for the purposes for which it was collected, or as required or permitted by law. The principal retention periods are:

Category	Retention period	Basis
Loan and account records (Limitless / FrontierLMS)	5 years from termination of the loan or account, or longer where required by law	NCA, FICA, Companies Act, contract
Consumer credit reports (Credit Office)	72 hours from retrieval — automated deletion	NCA Reseller Credit Bureau Regulations
Commercial credit reports (Credit Office)	3 months from retrieval	Validity period of the report
SACRRA DMA submissions	As directed by SACRRA — Octagon is Operator only	SACRRA DMA framework
Marketplace consent records	Lifetime of the underlying account + 5 years (evidentiary)	POPIA s.11(2)(a) — record of consent
Email-delivery logs (Sendgrid metadata)	Retained by Twilio per the Twilio terms; Octagon-side metadata retained 12 months	Operational; Originator audit
System and security logs	Minimum 12 months; extended to 5 years where related to a security incident	POPIA s.19; legitimate interests
Marketing data (where applicable)	Until consent is withdrawn; thereafter, suppression-list retention only	Consent under POPIA s.69 / CPA
Employee records (current and	5 years from end of employment, or	BCEA, LRA, Income Tax Act, COIDA,

former)

longer where required by law

UIF Act

11. How we secure personal information

Octagon implements the appropriate, reasonable technical and organisational measures contemplated in section 19 of POPIA, including:

- encryption of personal information in transit (TLS 1.2 or higher) and at rest (AES-256 or equivalent);
- role-based access controls, multi-factor authentication for administrative access, and a documented joiners-movers-leavers process;
- centralised security logging, intrusion detection, and regular vulnerability scanning;
- background checks and confidentiality undertakings for personnel with access to personal information, supported by security-awareness training;
- documented incident-response procedures, with a 24-hour internal-notification protocol;
- regular review of risks, controls, and the effectiveness of safeguards.

12. Your rights under POPIA

Subject to applicable law, you have the following rights in respect of your personal information:

- to be notified that your personal information is being collected, and that it has been accessed or acquired by an unauthorised person (sections 18 and 22);
- to request access to your personal information held by Octagon (section 23);
- to request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained (section 24);
- to object, on reasonable grounds, to the processing of your personal information (section 11(3));
- to object to processing for direct-marketing purposes (section 69);
- to withdraw any consent previously given, without affecting the lawfulness of processing prior to withdrawal;
- to lodge a complaint with the Information Regulator (see section 14 below).

To exercise any of these rights in respect of personal information for which Octagon is the Responsible Party (sections 3.5 above and any other Octagon-RP processing), please contact our Information Officer using the contact details in section 2.

Where personal information is processed by Octagon as Operator on behalf of a Responsible Party (Limitless, FrontierLMS, Credit Office, SACRRA DMA), please direct your request to that Responsible Party. We will provide reasonable assistance to the Responsible Party to enable it to respond to your request within the timeframes prescribed by POPIA.

13. Cookies and similar technologies

Our websites and platforms use cookies and similar technologies for authentication, session management, security, and the operation of platform features. Where required by law, the relevant site or platform requests the user's consent before non-essential cookies are set.

14. How to lodge a complaint

If you are not satisfied with the way Octagon has handled your personal information, you may complain to:

Body	The Information Regulator (South Africa)
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Email	complaints.IR@justice.gov.za · infoereg@justice.gov.za
Website	https://infoeregulator.org.za

15. Access to information (PAIA)

Octagon's manual prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") sets out the records that Octagon holds and the procedures for requesting access to those records. The PAIA manual is available on request from the Information Officer at the contact details in section 2.

16. Changes to this notice

Octagon may amend this notice from time to time to reflect changes in the law, in our business, or in our service-provider arrangements. The current version of this notice is the version published at www.octagon.co.za. Material changes will be notified to clients and (where reasonably practicable) to data subjects in advance.

17. Definitions

In this notice, capitalised terms have the meanings ascribed to them in POPIA. The following additional terms apply:

“Credit Office” means Octagon's reseller credit bureau service operated under NCR registration NCRCB42, as described in section 3.3.

“FrontierLMS” means Octagon's vetting and loan-origination platform, as described in section 3.2.

“Limitless” means Octagon's loan management platform, as described in section 3.1.

“Limitless Marketplace” means the platform feature described in section 8.

“NCA” means the National Credit Act 34 of 2005 and Regulations made thereunder.

“Operator” means a person who processes personal information for a Responsible Party in terms of a contract or mandate, as defined in POPIA.

“Originator” means a microlender, credit-provider, or business client of Octagon that uses one of Octagon's platforms to manage its lending or business operations and that is the Responsible Party in respect of its consumer-base.

“POPIA” means the Protection of Personal Information Act 4 of 2013.

“Responsible Party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

“SACRRA” means the South African Credit and Risk Reporting Association.

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