



PRIVACY POLICY

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Glossary

Term	Definition (Policy-Specific)
Administrative Staff (Admin)	Employees or contracted personnel responsible for operational, compliance, finance, or data administration functions, without authority to approve credit.
Agent	An authorized representative who assists clients with onboarding, education, and application support, but has no authority to approve loans, set terms, or handle funds.
Authority Level	The defined limits of decision-making power assigned to a role, including actions that are permitted and expressly prohibited.
Client Onboarding	The process of registering a client, capturing information, obtaining consent, and submitting applications into the CRM.
Collections Administrator	An administrative role responsible for monitoring repayments, issuing reminders, and supporting approved recovery processes, without settlement or write-off authority.
Compliance Escalation	The formal process of reporting suspected breaches, fraud, or regulatory risks to Compliance or Management.
Confidential Information	Any client, financial, credit, or personal data accessed through Flexi Growth systems that must be protected from unauthorized disclosure.
CRM Access	Permission-based entry to Flexi Growth's Customer Relationship Management system, granted according to role and function.
Data Capture	The recording of client or application information into authorized systems without alteration or manipulation.
Data Processing	Any operation performed on client data, including collection, storage, verification, or reporting, as governed by POPIA.
Field Agent	An agent who interacts directly with clients in person or remotely to assist with applications and explain processes.
Lead / Senior Agent	An experienced agent responsible for supervising other agents, monitoring conduct, and ensuring application quality, without credit approval authority.
Misrepresentation	Any false, misleading, or unauthorized statement made to a client regarding loan approval, pricing, terms, or outcomes.
No Cash Handling Rule	A strict policy prohibition preventing Admins and Agents from receiving, holding, or transferring client funds.
POPIA Compliance	Adherence to data protection obligations under the Protection of Personal Information Act, including lawful access and confidentiality.
Role-Based Access Control (RBAC)	A system that restricts system permissions based on a user's role and responsibilities.

Segregation of Duties	The separation of responsibilities to prevent a single individual from controlling multiple stages of a transaction (e.g. application, approval, and disbursement).
System Credentials	Unique login details issued to Admins or Agents for authorized system access; sharing credentials is prohibited.
Training & Certification	Mandatory onboarding, compliance, and refresher training required before system or client access is granted.
Unauthorized Activity	Any action taken outside the defined authority of a role, including approving credit, altering terms, or retaining client data.
Verification Support	Administrative assistance in checking the presence and validity of documentation, without making credit decisions.
Whistleblowing	The protected reporting of unethical, illegal, or non-compliant behavior by Admins or Agents.

1. Introduction

Flexi Growth Financial Services (“Flexi Growth”, “we”, “us”, or “our”) is committed to protecting the privacy, confidentiality, and security of personal and business information entrusted to us.

This Privacy Policy explains how we collect, use, disclose, store, and protect personal information when you engage with Flexi Growth through our website, CRM platforms, mobile tools, WhatsApp channels, field agents, partner programmes, or in-person interactions.

By applying for funding, registering on our platforms, or using our services, you acknowledge and consent to the processing of your personal information in accordance with this Privacy Policy and applicable South African law.

2. Who We Are

We are a developmental credit provider focused on enabling access to productive funding for entrepreneurs, micro-enterprises, and small businesses, particularly within underserved and growth-oriented communities.

We operate within a broader business ecosystem, which includes:

- **Growth Vista Consulting (Pty) Ltd** – accounting, tax, and financial management services
- **Growth Hub** – enterprise development, incubation, and funding readiness support
- **Bamboo Institute** – training, coaching, and skills development programmes

Where necessary, these entities may process personal information on behalf of Flexi Growth and strictly for legitimate, compatible purposes such as compliance, training, reporting, and post-funding support.

3. Information We Collect

We collect personal and business information directly from you or from authorized third parties, including the following categories:

3.1 Personal Identification Information

- Full names
- Identity number or passport number
- Date of birth
- Contact details (physical address, email address, telephone number)

3.2 Business & Financial Information

- Business name, registration details, and operating address
- Bank account and transaction details
- Proof of income, invoices, sales records, or contracts
- SARS, CIPC, and regulatory compliance documentation

3.3 Digital & Technical Information

- Device type, browser type, IP address, and usage data
- Information submitted through online forms, WhatsApp, or CRM systems

3.4 Credit, Verification & Compliance Data

- Credit bureau information (e.g. TransUnion, Experian)
- KYC, FICA, and AML verification documentation
- Risk scoring and affordability assessments

3.5 Training, Support & Impact Records

- Participation in training or coaching programmes
- Financial management or performance reports generated through ecosystem partners
- Impact and developmental reporting data (aggregated where possible)

4. Lawful Basis for Processing

We process personal information in terms of POPIA on the following lawful bases:

- Consent provided by the data subject
- Performance of a contract or credit agreement
- Compliance with legal and regulatory obligations
- Legitimate business interests, including responsible lending, risk management, and reporting

5. How We Use Your Information

Personal information is processed strictly for legitimate and compatible purposes, including:

Purpose	Description
Loan Processing & Management	Assessing eligibility, affordability, approval, disbursement, and repayment
Verification & Compliance	Identity checks, fraud prevention, and regulatory compliance (NCR, FICA, POPIA)
Client Support & Communication	Statements, reminders, notices, and service updates
Training & Development	Enrolment into relevant support, training, or mentorship programmes
Risk & Portfolio Management	Credit risk assessment, loan monitoring, and collections
Analytics & Reporting	Product performance, impact measurement, and statutory reporting

We do not process personal information in a manner that is excessive or incompatible with the purpose for which it was collected.

6. Sharing of Information

We may share personal information with:

- **Ecosystem partners** (Growth Vista, Growth Hub, Bamboo Institute) for compliance, reporting, and development support
- **Credit bureaus** for credit assessment and repayment behavior reporting
- **Regulatory bodies** (e.g. NCR, SARS, FIC) where required by law
- **Technology service providers** (CRM systems, hosting providers, payment processors) under strict confidentiality agreements
- **Insurance or value-added service partners**, only where you have provided consent

Flexi Growth **does not sell, rent, or trade** personal information to third parties.

7. Data Security Measures

We implement appropriate technical and organizational safeguards, including:

- Secure cloud-based infrastructure with restricted access
- Encryption of data in transit and at rest
- POPIA-aligned data retention and deletion protocols
- Regular system audits and access controls
- Staff confidentiality undertakings and data protection training

8. Your Rights Under POPIA

You have the right to:

- Request access to personal information held by Flexi Growth
- Request correction or deletion of inaccurate or outdated information
- Withdraw consent where processing is based on consent (subject to legal obligations)
- Object to processing for direct marketing purposes
- Lodge a complaint with the Information Regulator Information Regulator (South Africa):
www.justice.gov.za/infoereg

9. Retention of Information

Personal and business information is retained only for as long as necessary to:

- Fulfil contractual and credit obligations
- Comply with legal, regulatory, accounting, and audit requirements
- Support dispute resolution or future funding assessments. Once no longer required, information is securely deleted, anonymized, or archived in accordance with retention laws.

10. Cookies & Website Tracking

Our website may use cookies and analytics tools to improve user experience and performance monitoring. Users may disable cookies via browser settings, noting that some website functionality may be affected.

11. Direct Marketing & Communications

We may communicate educational content, funding updates, or service information relevant to your engagement with us.

You may opt out of marketing communications at any time by:

- Replying “**STOP**” to WhatsApp or SMS messages
- Using unsubscribe links in emails

12. Cross-Border Data Transfers

Where personal information is processed or stored outside South Africa, we ensures that:

- Equivalent data protection standards apply
- Appropriate contractual and security safeguards are in place

13. Updates to This Policy

This Privacy Policy may be updated periodically to reflect legal, regulatory, or operational changes. The latest version will always be available on our website.

14. Contact Information

For questions, concerns, or POPIA-related requests, please contact:

Flexi Growth Financial Services

Email: info@flexiegrowth.com

Contact 27 12 880 2193

Physical Address: Grit Space | Ground Floor | 356 Rosemary Street | Lynwood | Pretoria | 0081

POPIA Compliance Officer: info@flexiegrowth.com

Website: <https://flexiegrowth.vercel.app>

15. Approval

This Privacy Policy forms part of the Flexi Growth Policy Framework and applies to all digital platforms, credit agreements, and client-facing operations.

16. Document Control

Item	Detail
Policy Title	Administrative & Agent Role Definitions
Document Number	FG-POL-12
Policy Owner	Operations & Compliance
Applies To	Administrative Staff, Field Agents, Lead Agents
Document Type	Operational Governance Policy
Credit Context	Developmental Credit (Business / Juristic)
System Coverage	CRM, Website, Application Platforms
Access Level	Role-Based (Admin / Agent / Management)
Data Sensitivity	High – Client, Credit & Personal Information
Regulatory Alignment	NCA, NCR Guidelines, POPIA, FICA
Related Policies	Lending Policy; Privacy Policy; POPIA Policy; AML & FICA Policy; Code of Conduct
Approval Authority	Managing Director
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