

PRIVACY POLICY

Protection of Personal Information Act (POPIA) Compliant | Effective April 2026

RevGen Capital | White River, Mpumalanga | revgencapital.co.za | 0723624766

In Plain Language — What This Policy Covers

RevGen Capital collects personal information from three groups of people: (1) individuals and businesses visiting our website or making general enquiries, (2) buyers and applicants who apply for asset finance through us, and (3) referral partners who introduce clients to us.

We collect only what we need, use it only for the purpose stated, store it securely, and do not sell it to anyone.

You have rights over your information under POPIA. This policy explains what we collect, why, who we share it with, and how to exercise your rights.

If anything in this policy is unclear, contact us at Sebastian@revgencapital.co.za or 0723624766.

1. Who We Are

RevGen Capital is an asset finance brokerage operating from White River, Mpumalanga, South Africa. We apply on behalf of customers/buyers to lenders to arrange equipment and asset finance for businesses across the Lowveld, Mpumalanga and South Africa, acting as broker between applicants and funders.

For the purposes of POPIA, RevGen Capital is the Responsible Party, meaning we determine the purpose and means of processing your personal information and are accountable for how it is handled.

Information Officer: The owner of RevGen Capital, registered with the Information Regulator of South Africa in accordance with Section 55 of POPIA.

Sebastian Chapman

Contact: revgencapital.co.za | 0723624766 | White River, Mpumalanga

2. Who This Policy Applies To

This Privacy Policy applies to all personal information collected by RevGen Capital in connection with its business activities, including information collected from:

- Visitors to the RevGen Capital website (revgencapital.co.za)
- Individuals and businesses who submit enquiries or contact forms
- Buyers and applicants who apply for, or express interest in, asset finance through RevGen Capital
- Referral Partners who register under the RevGen Capital Referral Partner Programme
- Any other person whose personal information RevGen Capital receives in connection with a finance transaction

3. What Personal Information We Collect and Why

RevGen Capital collects only the personal information that is necessary for the specific purpose stated. The table below sets out the categories of people whose information we collect, what we collect, and why:

Who	Personal Information Collected	Why We Collect It (Purpose)
Website Visitors	IP address, browser type, pages visited, time on site, referral source (via cookies/analytics) names, emails and mobile numbers.	Improving website performance; understanding user behaviour; no individual identification intended. To make contact with those who are interested in our service.
Finance Applicants (Buyers)	Full name, ID number, contact number, email address, physical address, employment/business details, income/financial information, asset details. • latest 6 months bank statements • detailed suppliers quote of asset being financed. • AFS annual financial statements • Latest management accounts • debtors and creditors aging • asset register • ID of applicant • proof of address • proof of business address of applicable • CIPC docs	Assessing and processing asset finance applications; submitting to funders; communicating outcome; all funders need these documents in order to assess the business eligibility.
Referral Partners	Full name, ID number, company name, registration number, contact details, banking details, VAT number, tax information, deal referral history	Administering the Referral Partner Agreement; calculating and paying referral fees; POPIA and FICA compliance; tax record-keeping
General Enquirers	Name, email address, contact number, nature of enquiry (submitted via contact form, WhatsApp or email)	Responding to your enquiry; following up on potential finance needs and getting in touch with customers who reach out.

3.1 Sensitive Information

Where required for credit assessment purposes, RevGen Capital may collect and process financial information,, and identity documentation. This information is classified as sensitive personal information under POPIA and is treated with additional care. It is only collected with your explicit consent and is only shared with funders and credit bureaus for the direct purpose of assessing your finance application.

3.2 Information About Third Parties

If a Referral Partner provides us with an Applicant's personal information, the Referral Partner warrants that the Applicant has given their informed consent for that information to be shared with RevGen Capital. RevGen Capital will not process any third-party personal information that has been shared without proper consent.

4. Lawful Basis for Processing

RevGen Capital processes personal information on one or more of the following lawful grounds as required by POPIA:

- Consent — where you have given us specific, voluntary and informed consent to process your information for a stated purpose.

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- Contract — where processing is necessary to fulfil a contract with you, or to take steps at your request before entering into a contract (such as assessing a finance application).
 - Legal obligation — where we are required by law to collect or retain your information (for example, FICA obligations, NCA obligations, or SARS record-keeping requirements).
 - Legitimate interest — where processing is necessary for our legitimate business interests and those interests are not overridden by your right to privacy (for example, following up on a submitted enquiry).
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5. How We Use Your Personal Information

5.1 Finance Applicants and Buyers

- Assessing your eligibility for asset finance
- Submitting your application to our registered funders for credit evaluation
- Communicating the outcome of your application to you
- Maintaining records of funded transactions as required by law
- Contacting you about your application, approved deals, or related finance opportunities

5.2 Referral Partners

- Administering your Referral Partner Agreement
- Tracking qualifying referrals and calculating referral fees
- Processing payments to you and maintaining payment records
- Meeting our tax and SARS obligations in relation to fees paid
- Communicating with you about the programme, rate changes, and deal status

5.3 Website Visitors and Enquirers

- Responding to your contact form submission or WhatsApp enquiry
- Improving the performance and user experience of our website
- Understanding how visitors find and use our website (via analytics)

5.4 What We Will NOT Do With Your Information

- We will not sell, rent or lease your personal information to any third party.
 - We will not use your information for purposes incompatible with those stated in this policy without your consent.
 - We will not send you unsolicited marketing communications without your consent.
 - We will not transfer your information outside South Africa except where required by a funder operating in another jurisdiction and only with appropriate safeguards in place.
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6. Who We Share Your Personal Information With

RevGen Capital does not share personal information with third parties except in the following circumstances:

- Registered Funders and Credit Providers — your finance application data is shared with funders for the purpose of assessing and approving your application. These funders are subject to their own POPIA and NCA obligations.
- FICA-required disclosures may be required by law to report certain information to the Financial Intelligence Centre or other regulatory bodies.
- SARS Financial records may be disclosed to SARS in compliance with South African tax legislation.

- Legal and regulatory authorities — we may disclose information if required to do so by a court order, subpoena, or applicable law.
- Service providers — we may share limited information with trusted service providers who assist us in operating our business (for example, cloud storage, accounting software). These providers are contractually bound to process personal information only on our instruction and in compliance with POPIA.

We do not share personal information with any other party without your explicit consent.

7. How Long We Keep Your Information

We retain personal information only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. The table below sets out our standard retention periods:

Data Type	Retention Period	Reason
Finance application data	5 years after last transaction or application	NCA and FICA legal retention requirements
Referral Partner records	5 years after termination of agreement	Tax and SARS compliance (Income Tax Act)
Website visitor data (analytics)	13 months rolling	Standard analytics retention period
Contact form / enquiry data	2 years from last contact	Follow-up and dispute resolution
Funded deal records	7 years	SARS and FICA record-keeping obligations

Once the applicable retention period has passed, we will securely delete or destroy your personal information unless we are required by law to retain it for longer, or unless you have given us permission to keep it for another purpose.

8. How We Protect Your Information

RevGen Capital implements appropriate technical and organisational measures to protect your personal information against unauthorised access, loss, theft, alteration, disclosure or destruction. These measures include:

- Password protection and encryption of digital files containing personal information
- Two-factor authentication on business email and cloud storage accounts
- Access controls — personal information is only accessible to RevGen Capital staff and authorised service providers who need it to perform their functions
- Secure transmission of sensitive information (applications are submitted via secure channels, not plain email)
- Regular review of our security practices

No method of electronic transmission or storage is 100% secure. While we take all reasonable steps to protect your information, we cannot guarantee absolute security. In the event of a data breach that poses a risk to you, we will notify you and the Information Regulator as required by POPIA.

9. Cookies and Website Tracking

The RevGen Capital website may use cookies and similar tracking technologies to improve your browsing experience and analyse how the site is used. Cookies are small data files placed on your device when you visit a website.

9.1 Types of cookies we may use:

- Essential cookies — necessary for the website to function correctly. These cannot be disabled.
- Analytics cookies — help us understand how visitors interact with our website (for example, which pages are visited most). We use this information in aggregate to improve our content and user experience. We do not use analytics data to identify individuals.
- Contact form cookies — used to remember your details if you submit a contact form, so you do not have to re-enter them.

9.2 Your cookie choices:

When you first visit our website, you will be presented with a cookie consent notice. You may accept all cookies, decline non-essential cookies, or manage your preferences. You can also control cookies through your browser settings at any time. Please note that disabling certain cookies may affect the functionality of the website.

10. Your Rights Under POPIA

As a data subject under POPIA (Chapter 2, Section 5), you have the following rights in relation to your personal information:

Your Right	What It Means
Right to be informed	You have the right to know that your information is being collected and how it will be used. This Privacy Policy fulfils that obligation.
Right of access	You may request a copy of the personal information RevGen Capital holds about you at any time.
Right to correction	You may request that we correct any personal information that is inaccurate, incomplete, or out of date.
Right to deletion	You may request that we delete your personal information where it is no longer necessary for the purpose for which it was collected, subject to any legal retention obligations.
Right to object	You may object to the processing of your personal information. We will stop processing unless we have a lawful basis that overrides your objection.
Right to withdraw consent	Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal.
Right to lodge a complaint	You have the right to lodge a complaint with the Information Regulator if you believe your rights under POPIA have been infringed.

10.1 How to Exercise Your Rights

To exercise any of the rights listed above, contact RevGen Capital in writing:

- Email: via sebastian@revgencapital.co.za

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- Phone: 0723624766
 - Address: White River, Mpumalanga, South Africa

We will respond to your request within 30 days. In complex cases we may extend this period by a further 30 days, in which case we will notify you of the extension and the reason for it. We will not charge a fee for access requests unless the request is manifestly unfounded or excessive.

11. Consent

Where RevGen Capital processes your personal information on the basis of consent, that consent must be:

- Freely given — you must not be penalised for withholding or withdrawing consent
- Specific — consent is given for a specific, clearly described purpose
- Informed — you must understand what you are consenting to
- Unambiguous — consent must be a clear, affirmative action (not pre-ticked boxes or silence)

You may withdraw your consent at any time by contacting us as set out in Section 10. Withdrawal of consent will not affect the lawfulness of any processing already carried out on the basis of that consent. It may, however, mean that RevGen Capital is unable to process your finance application or continue certain services.

11.1 Website Contact Form Consent

When you submit a contact form or enquiry on our website, you will be asked to tick a consent box confirming that you agree to RevGen Capital processing your information to respond to your enquiry and assess your potential finance needs. This is a voluntary action — you may choose not to submit the form.

11.2 Finance Application Consent

Before submitting a finance application on your behalf, RevGen Capital will obtain your explicit written consent to share your personal and financial information with our registered funders and credit bureaus. This consent is built into our application process and is not optional — without it, we cannot process your application.

12. Children's Personal Information

RevGen Capital's services are directed at businesses and adults. We do not knowingly collect personal information from persons under the age of 18. If you believe we have inadvertently collected information from a minor, please contact us immediately and we will delete it.

13. Complaints and the Information Regulator

If you are unhappy with how RevGen Capital has handled your personal information, please contact us first so we can attempt to resolve the matter. We take all privacy complaints seriously and will investigate and respond within 30 days.

If you are not satisfied with our response, or if you believe your POPIA rights have been infringed, you have the right to lodge a complaint directly with the Information Regulator of South Africa:

- Website: www.inforegulator.org.za

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- Email: info@revgen.co.za
 - Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - Tel: 010 023 5200
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14. Changes to This Privacy Policy

RevGen Capital may update this Privacy Policy from time to time to reflect changes in our business practices, legal requirements, or the services we offer. We will post the updated policy on our website and update the effective date at the top of the document.

For material changes that significantly affect how we process your personal information, we will notify you directly by email or via a notice on our website before the change takes effect. Continued use of our website or services after the effective date of a change constitutes acceptance of the revised policy.

15. Contact Us

RevGen Capital — Privacy Contact Details

Information Officer: Owner / Director, RevGen Capital - Sebastian Chapman

Website: revgencapital.co.za

Phone: 0723624766

Physical Address: White River, Mpumalanga, South Africa

Registered with the Information Regulator of South Africa under POPIA Section 55

For all privacy requests, data access requests, consent withdrawals, or complaints — contact us using the details above.

We aim to respond to all privacy-related queries within 5 business days and all formal data subject requests within 30 days.

This Privacy Policy was prepared in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

Effective Date: April 2026 | Version 1.0 | Next Review: April 2027

RevGen Capital recommends reviewing this policy annually or whenever your data practices change.