

PRIVACY POLICY

This Privacy Policy describes how we manage Personal Data in compliance with the Protection of Personal Information, Act 4 of 2013 (POPI), the primary instrument regulating data protection in South Africa and EU GDPR Regulation (EU) 2016/679 (General Data Protection Regulation).

We encourage you to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

We may update this Privacy Policy from time to time. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time. We encourage you to check the latest version of this Privacy Policy regularly.

“Personal Data” refers to data, whether true or not, about an individual who can be identified from that data, or from that data in combination with other information to which the organization may have access and includes the meaning otherwise as defined in the Act as amended from time to time.

By signing up for or using any products, services offered by us or submitting information to or otherwise communicating with us, you agree and consent to us and our related entities, affiliates and subsidiaries (individually and collectively, “Companies”), as well as their respective representatives and/or agents (collectively referred to herein as “Company”, “us”, “we” or “our”) collecting, using and disclosing your Personal Data in accordance with this

Privacy Policy. “You” or “your” means any individual to whom the Act applies and includes an individual actual or prospective customer but excludes any corporate entity (including corporate customers) and any other entity that is excluded under the Act.

This Privacy Policy does not supersede or replace any other consents you may have previously or separately provided to us in respect of your Personal Data, and your consent to this Privacy Policy is in addition to any other rights which any of the Companies may have at law to collect, use or disclose your Personal Data.

1 This Privacy Policy and your use of this website shall be governed in all respects by the laws of South Africa.

- a. When you order or purchase services from us;
- b. When you post a feedback or interact with our customer service officers, eg. Via meetings, emails or telephone calls (which may be recorded for training, quality control, business and/or other lawful purposes);
- c. When you use some of our services including establishing any online accounts with us;
- d. when you request that we contact you, be included in an email or another mailing list;

- e. When you respond to our promotions, campaigns or other initiatives or attend our events;
- f. When we receive references from business partners and third parties, for example, where you have been referred by them;
- g. When you visit our websites;
- h. When you take part in any survey or promotion conducted by us and/or our business partners;
- i. During CCTV recordings when you visit our premises or photo taking or video recording at events;
- j. When we receive information about you from third-party social networking services when you choose to connect with those services;
- k. When you provide or contemplate providing security to us for a transaction;
- l. When you submit your Personal Data to us for any other reasons; and/or
- m. We collect your Personal Data by other lawful means

2 Purposes for which we collect, use and disclose your Personal Data

2.1 Your Personal Data may be collected, used and/or disclosed for the following purposes:

- a. to verify and process your personal particulars and payments;
- b. to provide goods and services to you;
- c. to respond and deal with inquiries, complaints and other customer-care matters or otherwise communicate with you;
- d. to monitor or record phone calls and customer-facing interactions for quality assurance, employee training, and performance evaluation and identity verification purposes;
- e. to manage payment, billing, account, credit checks and debt-recovery matters;
- f. to send you information, promotions, updates, and marketing and advertising materials in relation to our goods and services and that of our group companies;
- g. to manage, develop and improve our business and operations to serve you better;
- h. to carry out marketing promotions and campaigns and personalize your experience at our customer touchpoints;
- i. to carry out market research and customer surveys;
- j. to conduct investigations or audits or carry out crime and fraud prevention and risk management activities;

k. to comply with legal and regulatory requirements;

l. to enforce our legal rights and obligations;

m. to facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales);

n. for other purposes for which we have obtained your consent; and

o. for any other purposes reasonably necessary, ancillary or related to the above-specified purposes above by our officers and employees, third parties, affiliates, service providers, advisors, which include without limitation, the following persons or entities:

a. banks, credit card companies, and payment vendors;

b. debt collection agencies;

c. credit information companies;

d. logistics and courier services companies

e. call center services providers;

f. relevant government regulators or authorities or law enforcement agencies;

g. our insurers and advisors, including consultants, auditors, and lawyers;

h. data intermediaries; and

i. any other party to whom you authorize us to disclose your Personal Data to.

Save for relevant government regulators and authorities or law enforcement agencies, we will ensure that such parties receiving your Personal Data (i) are

under duty of confidentiality to us with respect to the use, holding, processing, retention and/or transfer of your Personal Data; and (ii) have the need to know or handle such Personal Data.

2.3 If you have provided us with your telephone number(s) and have indicated that you consent to receive marketing or promotional information via your telephone number(s), then from time to time, we may contact you using such telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.

2.4 Your Personal Data may be transferred, stored and/or processed in a country or territory outside South Africa and you consent to any such transfer, storage and/or processing of your Personal Data outside South Africa. We will, however, ensure that any party to whom we transfer your Personal Data outside South Africa provides to such Personal Data a standard of protection at least comparable to the protection under the Act. This includes without limitation ensuring that any party coming into contact with the Personal Data outside Singapore.

a. complies with the Act and accompanying guidelines issued by the relevant regulatory authorities, all applicable laws and regulations and this Privacy Policy (“Data Standards”) and shall not do or permit anything to be done which might cause such party or us to breach the Data Standards;

b. takes all appropriate measures to ensure such compliance by implementing such Data Handling Principles as notified by us to them from time to time and appropriate technical and organizational measures and providing a standard

of protection for the Personal Data that is comparable to the protection under the Act; and

c. protects the Personal Data by making reasonable security arrangements to prevent unauthorized access, use, disclosure or modification.

3 Withdrawal of Consent & Access

3.1 You may withdraw your consent to our continued use and disclosure of your Personal Data or seek access to your Personal Data (to a reasonable extent and as permitted by the Act) at any time by writing to the Office of our Data Protection Officer. You may also withdraw your consent for specific forms of communication and on specific communications via the unsubscribe options as stated on our email or other marketing messages.

3.2 In withdrawing your consent, you acknowledge that we may not be able to provide or continue providing certain goods and/or services to you and that we may cease such provision accordingly without any liability. Please note that it may take up to 30 working days for any request for consent withdrawal to be reflected in our systems.

3.3 We will, at your request, endeavor to provide you with an account of your Personal Data in our possession or control within a reasonable time. Such account shall be in respect of how your Personal Data has been or may have been generally used or disclosed within the year before the date of your

request. We reserve the right to charge a reasonable administrative fee for carrying out your request.

4 Accuracy & Correction

4.1 We will endeavor to ensure that your Personal Data we use is sufficiently accurate and complete in making any decision that impacts you.

4.2 To help us maintain the accuracy of your Personal Data, we encourage you to inform us when there are any changes to your Personal Data which you have provided us by writing to the Office of our Data Protection Officer. We will correct or complete your Personal Data as soon as reasonably practicable.

5 Protection, Policies, and Procedures

We will endeavor to protect your Personal Data in our possession or control against risks of unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction, through reasonable and appropriate security measures. We strive to ensure that our systems are secure and that they meet industry standards.

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the Personal

Data we collect. Notwithstanding our security measures for protecting your Personal Data, you acknowledge that no data transmission over the Internet is completely secure and by providing your Personal Data, you are transmitting information at your own risk.

6 Retention of Personal Data

We will retain your Personal Data for as long as you use our products or services and it is necessarily required or relevant for business or legal purposes.

7 Cookies

7.1 We gather Information on our website activity, such as data on the number of visitors, the pages they visit, the duration of their stay, etc. Such information is collected on an aggregate, anonymous basis, which means no Personal Data is associated with this data and gathered through the use of web server logs and cookies. We do not at our website automatically collect Personal Data unless you provide such information or login with your account credentials.

7.2 Cookies are small bits of data automatically stored on the hard drive of the end user and are commonly used to track preferences in relation to the subject of such website. If you enable these cookies, then your web browser

adds the text in a small file. You may wish to set your web browser to notify you of a cookie placement request or refuse to accept cookies by modifying relevant internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions on our website.

7.3 By accessing and using our website and services, you consent to the storage of cookies, other local storage technologies, beacons and other information on your devices. You also consent to the access of such cookies, local storage technologies, beacons and information by us or our representatives or agents.

8 Third-Party Links and Products on Our Services

Our website and/or services may link to third-party websites and services that are outside our control. For example, we may enable you to share certain materials on the services with others through social networking services such as Facebook. We are not responsible for the security or privacy of any information collected by websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use. To the fullest extent permitted under laws, we cannot be responsible for a third party's acts, omissions, data policies or their use of cookies nor the content or security of any third party websites, even if linked to our website. Any such liability is expressly disclaimed and excluded.