

## PRIVACY POLICY

### 1. The Protection of Personal Information Act 4 of 2013 (Hereinafter referred to as "POPIA")

1.1. We are fully compliant with POPIA in terms of existing regulations as well as those which are still to come into effect. For purposes of this policy, "Personal Information" has been ascribed the definition set out in Section 1 of POPIA. We suggest you familiarise yourself with POPIA so as to enhance the terms of this policy for cross-referencing purposes.

1.2. Should you feel that your rights in terms of POPIA have been infringed upon, please let us know immediately so that we may rectify the situation as we seek to process Personal Information lawfully and in a reasonable manner so as not to infringe unnecessarily on your privacy, as is required by Sections 9 and 10 of POPIA

### 2. The Personal Information we collect and its purpose

2.1. We collect and process your personal information for the sole purpose of contacting you and for the understanding your requirements and delivering services accordingly, such as creating your profile, facilitation of the KYC process and payments made to and from a virtual wallet. This is solely to render services and will not be disclosed to third parties which do not form part of our services rendered to you, in discharge of the provisions of Section 13 of POPIA.

2.2. We do require that the personal information provided is accurate and truthful and request that you take notice that this policy forms part of any agreement which we may enter into with you, tacitly. This Personal Information will only be retained for as long as is reasonably necessary, whereafter, it will be destroyed so as to de-identify you.

2.3. We will advise what personal information is mandatory and that which is optional. This is for your own privacy.

2.4. Website usage information may be collected using "cookies" which allows us to collect standard internet visitor usage information.

2.5. We cannot process the Personal Information of a minor, as contemplated by Section 36 of POPIA.

### 3. The Application of your Personal Information

3.1. Your personal information will solely be used to further our agreement with you and that which you may have with your own clients. We have an information officer, as required by Section 55 of POPIA who oversees the handling of Personal Information.

3.2. In addition, where necessary your Personal Information may be retained for legal purposes.

3.3. The handling of your personal information is as follows:

3.3.1. Gathering your contact information;

3.3.2. Confirming and verifying your identity or to verify that you are an authorised user for security purposes;

3.3.3. Detection and prevention of fraud, crime, money laundering or other malpractice;

3.3.4. Conducting market or customer satisfaction research or for statistical analysis;

3.3.5. Auditing and record keeping purposes;

3.3.6. Legal purposes.

### 4. Necessary Disclosures

4.1. We may disclose your personal information to our service providers. We have agreements in place to ensure that they comply with the privacy requirements as required by the POPIA analogous to our own policy.

4.2. We will also disclose your information:

4.2.1. Where we have a duty or a right to disclose in terms of law or industry codes; and / or

4.2.2. Where we believe it is necessary to protect our rights.

### 5. Information Security

5.1. We are obliged by Section 19 of POPIA to provide adequate protection and security of the Personal Information we hold and to stop unauthorised access and use of Personal Information.

5.2. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

5.3. Our security policies and procedures cover:

5.3.1. Computer and network security;

5.3.2. Access to Personal Information;

5.3.3. Secure communications;

5.3.4. Security in contracting out activities or functions;

5.3.5. Retention and disposal of Personal Information;

5.3.6. POPIA compliant usage of Personal Information;

5.3.7. Governance and regulatory issues;

5.3.8. Monitoring access and usage of private information; and

5.3.9. Investigating and reacting to breaches.

5.4. When we contract with partners, we impose appropriate security, privacy and confidentiality

obligations on said partners to ensure that Personal Information that we remain responsible for, is kept secure.

- 5.5. We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.
- 5.6. We do, however, not accept any liability for malicious hacking of our database to obtain Personal Information, despite our concerted and diligent efforts to protect said Personal Information database breaches. We will immediately notify you of a breach, as is required by Section 22 of POPIA.

#### 6. **Your Rights regarding Access to information**

- 6.1. You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers / addresses as provided on our website and specify what

information you require. This will require positive identification. This will incur a fee, as is contemplated by Section 23 of POPIA.

#### 7. **Your Rights regarding Personal Information**

- 7.1. You have the right to
  - 7.1.1. ask us to update, correct or delete your personal information which we will do upon positive identification;
  - 7.1.2. inquire what Personal Information we have of you;
  - 7.1.3. inquire as to what information was sent to our suppliers, service providers, or any other third party;
  - 7.1.4. unsubscribe from any direct marketing communications we may send you; and
  - 7.1.5. object to the processing of your personal information.