

**SERITI HOLDINGS (PROPRIETARY) LIMITED AND SUBSIDIARIES  
 PRIVACY POLICY**

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## 1 Introduction

We, at Seriti, recognise the importance of protecting your privacy in respect of your personal data, as defined by the Protection of Personal Information Act, 4 of 2013 ("POPIA"), processed by us. We are committed to protecting your personal data entrusted to us. This Policy provides the details of the personal data we collect from you, what we do with the personal data, how you might access the personal data and who it might be shared with.

We use your personal data to provide and improve our service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

## 2 Definitions

2.1 For the purposes of this Privacy Policy:

- **Account** means a unique account created for you to access our Services or parts of our Services.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Seriti Holdings (Pty) Ltd and Subsidiaries.
- **Cookies** are small files that are placed on your computer, mobile device, or any other device by a website, containing the details of your browsing history on that website, among its many uses.
- **Republic** refers to the Republic of South Africa.
- **Device** means any device that can access the service such as a computer, a cell phone, or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual and an identifiable and existing juristic person as is defined in POPIA.
- **Service** refers to the website and/or digital services like the internet.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the service, to provide the service on behalf of the Company, to perform services related to the service or to assist the Company in analysing how the service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a user can log in or create an account to use the service.
- **Usage Data** refers to data collected automatically, either generated by the use of the service or from the service infrastructure itself (for example, the duration of a page visit).

- **You** means the individual accessing or using the service, or the company, or other legal entity on behalf of which such individual is accessing or using the service, as applicable.

### 3 **Collecting and Using Your Personal Data**

#### 3.1 **Types of personal data Collected**

Personal information is information which identifies or could reasonably be associated with you.

While using our service or communicating with our staff, we may ask you to provide us with certain personal data that can be used to contact or identify you. The personal data that we collect from you, may include, but is not limited to:

- Email address
- First name and last name
- Name of legal entity
- Authorised signatories
- Identity number
- Occupation
- Gender
- Phone number
- Physical and/or postal Address
- Usage Data
- Company Registration Number
- Company VAT number
- Background checks
- Banking Information
- Tax identification
- Header and Footer information in email messages
- Internet protocol
- Details of financial institutions
- Financial services provider registration number
- Credit provider registration number

- Record of Education

### 3.2 Usage Data when interfacing with our digital platforms

Usage Data is collected automatically when using the service or manually when communicating with any our staff or subsidiaries. Usage Data may include information such as your device's internet protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our service or when you access the service by or through a mobile device.

### 3.3 Information from Third-Party Social Media Services

Should the Company allow you to create an account and log in to use the service through the following Third-party Social Media Services:

- Google
- Facebook
- Twitter
- LinkedIn

And if you decide to register through or otherwise grant us access to a Third-Party Social Media Service, we may collect personal data that is already associated with your Third-Party Social Media service's account, such as your name, your email address, your activities or your contact list associated with that account.

You may also have the option of sharing additional information with the Company through your Third-Party Social Media service's account. If you choose to provide such information and personal data, during registration or otherwise, you are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy.

### 3.4 Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on our service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse our service. The technologies we use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our service. Unless you have adjusted your browser setting so that it will refuse Cookies, our service may use Cookies.
- **Flash Cookies.** Certain features of our service may use local stored objects (or Flash Cookies) to collect and store information about your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how you can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at [https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main\\_Where\\_can\\_I\\_change\\_the\\_settings\\_for\\_disabling\\_or\\_deleting\\_local\\_shared\\_objects](https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling_or_deleting_local_shared_objects)
- **Web Beacons.** Certain sections of our service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser. We use both Session and Persistent Cookies for the purposes set out below:

#### *Necessary / Essential Cookies*

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have

asked for cannot be provided, and we only use these Cookies to provide you with those services.

#### *Cookies Policy / Notice Acceptance Cookies*

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

#### *Functionality Cookies*

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

## 4 **Use of Your Personal Data**

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our service.
- **To manage your account**: to manage your registration as a user of the service. The personal data you provide can give you access to different functionalities of the service that are available to you as a registered user.
- **For the performance of a contract**: the development, compliance and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the service.
- **To contact You**: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

- **To manage Your requests:** To attend and manage your requests to us.
- **For other purposes:** We may use your personal data for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing, and your experience.

5 **We may share Your Personal Data in the following situations:**

- **With Service Providers:** we may share your personal data with service providers to monitor and analyse the use of our service, to contact you.
- **For business transfers:** we may share or transfer your personal data in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** we may share your personal data with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With business partners:** we may share your personal data with our business partners to offer you certain products, services, or promotions.
- **With other users:** when you share personal data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If you interact with other users or register through a third-party social media service, your contacts on the third-party social media service may see your name, profile, pictures, and description of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you and view your profile.
- **With Your consent:** we may disclose your personal data for any other purpose with your consent.

6 **Retention of Your Personal Data**

The Company will retain your personal data only for as long as is necessary for the purposes set out in this privacy policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security

or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

## 7 **Transfer of Your Personal Data**

Your personal data is processed at the company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. Insofar as your information may be transferred outside of the Republic, we will take reasonable organisational and/or contractual measures to ensure that your personal information is processed by such third party for the purposes for which it has been provided to us and that the required levels of protection have been implemented by such third party service providers to safeguard your personal information.

Your consent to this privacy policy followed by your submission of such information represents your agreement to that transfer.

## 8 **Disclosure of Your Personal Data**

### 8.1 **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different privacy policy.

### 8.2 **Law enforcement**

Under certain circumstances, the Company may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### 8.3 **Other legal requirements**

The Company may disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the service
- Protect the personal safety of users of the service or the public
- Protect against legal liability

## 9 **Security of Your Personal Data**

The security of your personal data is important to us but remember that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

We will take all appropriate, reasonable, technical, and organisational measures to safeguard your Personal Information to prevent loss of, damage to or unauthorised destruction of your Personal Information or unlawful access to or processing of your Personal Information. [Our technical and organizational personal data security measures include:

- the storage of your personal data under password-secured databases;
- the restriction of access to your personal data to specific staff/personnel who are designated and mandated to manage your personal data;
- the restriction of access to all our premises where your personal data is stored in physical or digital form; and
- the binding of any third parties who handle your personal data to confidentiality obligations with respect to the same.]

The Company employs the following security measures to safeguard the data in the possession of or in control of the Company. This includes instances where the Company is only performing services as an operator.

- a. Firewall Protection;
- b. Antivirus Software;
- c. Transport Layer Security (TLS) Encryption;
- d. Authentication Algorithm (SHA-256) Encryption;
- e. Authenticated Access Control (AAC);
- f. Role Based Access Control (RBAC);
- g. Transparent Data Encryption (TDE) for Data at Rest (for web-based systems).

## 10 **Children's Privacy**

Our service does not address anyone under the age of 18. We do not knowingly collect personal data from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

#### **11 Access to your personal information**

You have the right to request access to any of your personal data we may hold. If any of that information is incorrect, you may request that we correct it. If you would like to make a request to see what personal data of your we might hold, you may make a request to our Deputy Information Officer and contact us at [POPIA@SeritiSolutions.com](mailto:POPIA@SeritiSolutions.com). We suggest that you regularly update your personal information.

Where you have previously given your consent to process your personal data, you also have the right to request that we transmit your personal data to a different service provider.

Where it may have been necessary to get your consent to use your personal data, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal data without affecting the lawfulness of processing based on consent before your withdrawal.

#### **12 Links to Other Websites**

Our service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

#### **13 Changes to this Privacy Policy**

We may update our privacy policy from time to time. We will notify you of any changes by posting the new privacy policy on this page.

We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "last updated" date at the top of this privacy policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If you have any questions about this Privacy Policy, you can contact us at:  
[POPIA@SeritiSolutions.com](mailto:POPIA@SeritiSolutions.com)