



SEBENZA AFRICA PRIVACY POLICY

1. INTRODUCTION

Sebenza Africa respects your privacy and your personal information and takes all reasonable measures to protect your personal information and to keep it confidential.

This Privacy Policy complies with the principles outlined in Protection of Personal Information Act, 4 of 2013 ("POPIA") and describes how Sebenza Africa handles Personal Information that we collect from you:

- electronically,
- telephonically,
- when you make use of our website,
- when you apply for and use our services.

By submitting your details to Sebenza Africa, registering with Sebenza Africa, using the Sebenza Africa website or the services we provide, you accept the terms and conditions of this Privacy Policy and explicitly consent that Sebenza Africa may collect, collate, process, use, disclose and store your Personal Information in the manner set out in this Policy.

If you do not agree with the provisions of this Privacy Policy or are concerned about any aspect relating to the protection of your Personal Information, please do not continue to use the website or register with Sebenza Africa or apply for or use Sebenza Africa services.

The Privacy Policy must be read together with Sebenza Africa's General Terms and Conditions. To view Sebenza Africa's general Terms and Conditions please visit <https://sebenza-africa.com/>

2. WHAT IS PERSONAL INFORMATION?

"Personal information" as defined in Section 1 of POPIA, means information relating to an identifiable, living, natural person and where it is applicable, an identifiable juristic person, including but not limited to –

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or



Mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person;

- any information relating to an identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to a person;
- information relating to the education or the medical, financial, criminal or employment history of a person;
- the blood type or any other biometric information of a person;
- personal opinions, views or preferences of a person;
- the views or opinions of another individual about the person;
- the name of a person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person,
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; and
- the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

3. PERSONAL INFORMATION THAT WE COLLECT

Personal Information collected may include:

- General identification and contact information,
- Your name, address, e-mail address, telephone number, gender, marital status, family status, date of birth, passwords and activity records,
- Identification numbers issued by government bodies or agencies,
- Financial information and account details,
- Bank account number and account details, credit history, credit score and other financial information,
- Current or former physical or mental or medical condition, health status, injury or disability information, medical procedures performed, personal



habits (for example, smoking or consumption of alcohol, prescription information and medical history),

- Recordings of telephone calls, emails or videos to and from our representatives, affiliates and call centres.

We may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud or in the employment process.

We may also obtain sensitive information if you voluntarily provide it to us.

4. FROM WHOM WE COLLECT PERSONAL INFORMATION

Personal information will be collected directly from you, except if:

- the information is contained in a public record or has deliberately been made public by you;
- you have consented to the collection of the information from another source or in accordance with the Sebenza Africa terms and conditions of service;
- collection of the information from another source would not prejudice a legitimate interest you may have;
- collection of the information from another source is necessary –
 - to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - to enforce a law imposing a pecuniary penalty;
 - to enforce legislation concerning the collection of revenue as defined in relevant local legislation;
 - for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated; or
 - in the legitimate interests of national security.



5. UPDATE OF YOUR PERSONAL INFORMATION

It is your responsibility to ensure that we have your correct Personal Information on our system.

If you ever need to update or correct any of your Personal Information held by us, you can update and correct your information by contacting Sebenza Africa via email or telephonically.

6. HOW WE COLLECT YOUR PERSONAL INFORMATION

Sebenza Africa collects your Personal Information when you:

- apply for or use the services provided by us,
- access our website,
- register on our website,
- complete an application form,
- contact us electronically or telephonically.

7. HOW WE USE YOUR PERSONAL INFORMATION

You agree that we may use the information, including the Personal Information we hold about you, in the following ways:

- to identify you,
- in order for us to process your instructions or requests,
- in order for us to ensure that we provide you with the best possible service at all times,
- to collect and analyse your personal information and combine all the information that we have about you to compile a profile of you in order for us to personalize and tailor our services to meet your specific needs;
- in aggregate form for purposes of generating statistics and developing strategic and marketing plans, to allow you to participate in interactive features of our services, when you choose to do so,



- to carry out any contracts that may exist between us,
- to notify you about changes to our services or introduce you to new services.

Once we have collected and analysed your Personal Information, we may send you promotional material or details which we think may be of interest to you.

If any of this promotional information relates to products, promotions, news or services of an affiliate party and only if you indicate that you would like more information, we may inform the affiliate party to contact you directly. You have the option to opt out of receiving any marketing or other material from an affiliate or us at any stage.

8. PROTECTION OF YOUR PERSONAL INFORMATION

We value the information that you choose to provide us with and we will take reasonable steps to protect your Personal Information from loss, misuse or unauthorised alteration or access.

The information we maintain is stored in databases that have built-in safeguards to ensure the privacy and confidentiality of that information. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

However, the transmission of information via the Internet or electronic mail is not completely secure and we cannot guarantee the security of your information transmitted to our website or via electronic mail. Any transmission of your information to our website or via electronic mail is entirely at your own risk.

When you use the services provided by us, you may be given a user name and password. You are responsible for maintaining the secrecy and confidentiality of your user name and password. Please do not share your username and password with anyone.

9. CONFIDENTIAL INFORMATION

Confidential information shall not include information that:

is or becomes publicly known, other than through any act or omission of the receiving Party;



was in the other Party's lawful possession before the disclosure;

is lawfully disclosed to the receiving Party by a third party without restriction on disclosure;

is independently developed by the receiving Party, which independent development can be shown by written evidence; or

is required to be disclosed by law, by any court of competent jurisdiction or by any regulatory or administrative body.

We shall hold Confidential Information in confidence and, unless required by law, not make the other's Confidential Information available to any third party, or use the other's Confidential Information for any purpose other than the implementation of this Policy and any subsequent Agreement entered between us.

We shall take all reasonable steps to ensure that Confidential Information, to which it has access, is not disclosed or distributed by our employees or agents in violation of the terms of this Policy.

10. DATA PROTECTION

10.1. We may need to provide, collect, use, store or process Confidential Information or Personal Information and you hereby authorise such collection, use, storage and processing where the need arises.

10.2. We shall only provide, collect, use, store or process Personal Information:

10.2.1. in compliance with the applicable legislation;

10.2.2. as is necessary for the purposes of this Policy, and

10.2.3. in accordance with lawful and reasonable instructions of the Party

Providing the Personal Information.

10.3. We are responsible to obtain written consent from all applicable data subjects, for the collection, use, storage, processing or transfer of such data subjects' Personal Information whenever this is required for the purposes of this Policy you warrant that it will be done so.



11. YOUR CONSENT AND DISCLOSURES OF YOUR PERSONAL INFORMATION

You agree that Personal Information may be shared under the following circumstances:

- with our employees and/or third party service providers who assist us to interact with you via our website, email or any other method, and therefore need to know your personal information in order to assist us to communicate with you properly and efficiently,
- with our affiliates and/or partners and/or corporate sponsors (including their employees and/or third party service providers) in order for them to interact directly with you via email or any other method for purposes providing services to you,
- to monitor web traffic: web servers serving the website automatically, collect information about pages you visit and this information is used for internal review, to tailor information to individual visitors and for traffic audits;
- for statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the website for product development purposes;
- where necessary in order to give effect to agreements signed between you and ourselves,
- when required by the laws of the Republic of South Africa and in the public interest,
- under special circumstances where we have reason to believe that such disclosure is necessary to identify, contact or bring legal action against a party who may be breaching our website terms and conditions or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

Sebenza Africa will ensure that all of our employees, third party service providers, divisions, affiliates, partners and corporate sponsors (including their employees and third party service providers) having access to your Personal Information are bound by appropriate and legally binding confidentiality and non-use obligations (save as permitted herein) in relation to your Personal Information.



We will not sell, rent or provide your Personal Information to unauthorised entities third parties (other than as provided herein) for their independent use, without your express consent.

If at any stage, after you have given us your consent, you no longer wish for us to use or share your Personal Information, you may withdraw your consent.

When we notify you that your Personal Information has been accessed or acquired by an unauthorised person, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

12. CONSUMER PROTECTION ACT 68 OF 2008 (“CPA”) AND POPIA

We subscribe to the CPA and the principles outlined Section 11, in which you have the right to restrict unwanted marketing, which includes your right to refuse to accept, or require us to discontinue or to pre-emptively block communication about any marketing from us.

You have the right to object to the processing of your Personal Information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent.

You have the right not to have your Personal Information processed for purposes of direct marketing by means of unsolicited electronic communications from third

parties unknown to you, other than Sebenza Africa's duly appointed and authorised third party business partners who may do so on Sebenza Africa's behalf.

13. YOUR RIGHTS

You have the right to request that we correct, destroy or delete any of your Personal Information that we have processed in accordance with this Policy. The Personal Information that you may request us to correct, destroy or delete is Personal Information that has been processed that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.

You have the right to withdraw your consent for us to process your Personal Information at any time. The withdrawal of your consent can only be made by you on the condition that:



- the withdrawal of your consent does not affect the processing of your Personal Information before the withdrawal of your consent; or
- the withdrawal of your consent does not affect the processing of your Personal Information if the processing is in compliance with an obligation imposed on us by law; or
- the withdrawal of your consent does not affect the processing of your Personal Information where such processing is necessary for the proper performance of a public law duty by a public body; or
- the withdrawal of your consent does not affect the processing of your Personal Information as required to finalise the performance of a contract to which you are a party; or
- the withdrawal of your consent does not affect the processing of your Personal Information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.

You have the right to object to the processing of your Personal Information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.

You can make the objection if the processing of your Personal Information is not necessary for the proper performance of a public law duty by a public body, or if the processing of your Personal information is not necessary to pursue your legitimate interests, our legitimate interests or the legitimate interests of a third party to which the information is supplied.

You have the right not to be subjected to a decision, which is based solely on the basis of the automated processing of your Personal Information intended to provide a profile of you.

You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of Personal Information processed in accordance with this Policy.

14. CHANGES TO THIS PRIVACY POLICY

We reserve the right, in our sole discretion to amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time. Any changes to this Privacy Policy will be drawn to your attention on our website.



You agree to review the Privacy Policy whenever you visit the Sebenza Africa website for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

15. BREACH

You agree and consent to endeavour to uphold and apply the terms and conditions of this Policy and act within the scope and purpose of this Policy. Should you breach any of the terms and conditions of this Policy, we may proceed to institute legal action.

16. HOW DO YOU CONTACT US?

If you have questions about this Privacy Policy or wish to amend or update any of your Personal Information you may contact Sebenza Africa on partners@sebenza-africa.com