
EXTERNAL PRIVACY NOTICE

1. Purpose of this Privacy Notice

- 1.1. This Privacy Notice (“**Notice**”) dictates how and when _____ (“**the Company**”) with Registration No.: _____, situated at _____, and their collects, uses, and shares personally identifiable information (“**Personal Information**” or “**PI**”).
- 1.2. Personal Information includes Special Personal Information and Personal Information of both natural persons and juridical entities as defined within the Act.
- 1.3. This Privacy Notice applies to all external parties with whom the Company or Group of Companies engage as part of the business operations and / or services (hereto referred to as “**Data Subjects**”/ “**You**”/ “**Your**”) and whereas part of such engagement, the Company may collect, use, and share Personal Information.
- 1.4. As part of the Company’s operational strategy, the Company engages with Consultants and / or external suppliers in the operation of its business and utilizes several centralised functions and systems across the Company or Group of Companies. Your Personal Information may be processed through these centralised functions and systems. Such Processing will be in accordance with the purpose and in the manner as set out in the Company’s POPIA and PAIA Policy / Manual, Code of Conduct (aligned to the industry) and this Privacy Notice.
- 1.5. Any enquiries pertaining to the Policy, Manual, Code of Conduct or this Privacy Notice, must be directed to the Information Officer and / or his Deputy:

Name: Steven Allen Preston
Physical Address: Cramerview Village Centre
277 Main Road
Bryanston
2021
Republic of South Africa

Telephone Number: 011 706 2727
E-mail: steven@a2pay.co.za

Name: Zhane Adele Mills
Physical Address: Cramerview Village Centre
277 Main Road
Bryanston
2021
Republic of South Africa

Telephone Number: 011 706 2727
E-mail: zhane@a2pay.co.za

2. Collection of Personal Information

- 2.1. The Company, in conducting of its business operations, mostly engages and contracts with juristic entities for services. In dealing with such entities, the Company also engage with individuals within the entities and collect and use the Personal Information of such person(s).
- 2.2. The Company will process the Personal Information of such individuals as stated in this Privacy Notice.
- 2.3. **Contact Information** such as Company name, contact persons, e-mail addresses, physical address, phone and mobile numbers are collected for processing;
- 2.4. **Account and payment information** such as authorised account users, VAT and Income tax reference numbers, bank details, invoices and records, SWIFT and IBAN details;
- 2.5. **Verification Information** such as username, password, password reminder questions and password answers;
- 2.6. **Procurement Identifiers** such as Company registration numbers, identity numbers, Supplier/Vendor number, B-BBEE status, vehicle registration numbers, driver's license, physical addresses and IRSA registration of IO / DIO;
- 2.7. **Contract information** including product or services information, commercial terms of the contract, contract performance and non-performance;

- 2.8. **Tender request information** including client references, proof of insurance and tax clearance certificate of good standing, account details;
- 2.9. **Website, Mobile Applications and Social Media information:** when you access any of the Company website(s) (or special purpose portals) including any brand websites, the Company will collect IP addresses and other technical information about your computer and website;
- 2.10. **Financial information** such as financial statements, credit and trade references, shareholders, trustees and sureties are requested from time to time for operational purposes;
- 2.11. **Background and Credit information including** credit status and depending on the nature of the services/contract, criminal record and fraud checks may be done to which signatures are required to proceed;
- 2.12. **Principles Information:** where a person apply for credit, the name, ID numbers, and residential addresses, Shareholders and Directors and details of property(s) owned by Principals (Sole Owner / Partners / Members / Directors) will be requested;
- 2.13. **CCTV:** The Company may process videos of an individual obtained via our CCTV surveillance systems at premises;
- 2.14. **Recruitment information:** CV/resume, SA ID number, passport number; training records, education and work history, address, contact details, certifications/qualifications. Reference checks will be done in terms of a Data subjects signature;
- 2.15. **Information relating to Individual Consumers of our Products:** such as name, phone number, email address, physical address, mobile phone number, preferred language, details of complaints, bank account details for payment of any agreed settlement amount, medical information were the basis if the claim is health related.

3. Where a person refuses to supply or grant permission to store and process PI

- 3.1. In the case that a person or individual or Company refuses any PI to be gathered, stored or processed, then:

- 3.1.1. We may not be able to onboard a person as a vendor and / or supplier or employee;
- 3.1.2. We may not be able to conclude a contract to do business with you or your business; and
- 3.1.3. We may not be able to respond to enquiries or investigate a complaint received.

4. How We Collect Personal Information:

4.1. We collect information **directly** from the data subject or supplier as per:

- 4.1.1. The engagement directly with a data subject or business management as part of any onboarding process;
- 4.1.2. The Company undertakes and signs a written agreement (“SLA / NDA”);
- 4.1.3. A data subject or business engages with the Company through emails, complaints or queries via call centres or respective departments;
- 4.1.4. When entering our business premises, offices, facilities and work areas (for example via CCTV) or access control measures;
- 4.1.5. Interaction with the Company support, sales and account management teams;
- 4.1.6. Agreement engagement for services to be rendered as a 3rd party provider or sell or purchase products from the Company;
- 4.1.7. Submission of tenders; and
- 4.1.8. Applying for credit facilities or credit services.

4.2. We collect Personal Information **indirectly** from:

- 4.2.1. Other businesses in the Company or Group of companies;
- 4.2.2. Websites, by phone, email, or through participation in a surveys conducted through 3rd party websites (including the Company’s branded sites which may be managed by 3rd parties) or through social media platforms such as Facebook, Snapchat, Instagram, LinkedIn and TikTok;
- 4.2.3. Public sources and registers (such as company registers, online search engines, (title) deeds registries, public posts on social media);
- 4.2.4. 3rd parties that engage for the purposes of conducting its business (listed providers, credit bureaux, regulators and government departments and 3rd party service providers);
- 4.2.5. Employment agencies, background check providers, former employers, credit reference agencies or other background check agencies.

5. Purpose of PI utilization

5.1. Personal information is utilized for–

- 5.1.1. to operate and execute the vision of the Company;
- 5.1.2. to implement and manage relationships including onboarding as a Vendor or Customer, processing and fulfilling orders, sending invoices, processing payments, accounting, auditing, billing, collection and returns;
- 5.1.3. to provide customer services (for example, product recalls, tracking, and responding to product quality concerns);
- 5.1.4. to comply with any legislation or regulation which requires the Company to collect the information;
- 5.1.5. to comply with demands or requests made by Regulators, Governmental Authorities and Law Enforcement Authorities;
- 5.1.6. to monitor and analyse trends, usage and activities in connection with products;
- 5.1.7. to improve the Company products and services;
- 5.1.8. to ensure that the Company has accurate information at all times;
- 5.1.9. to conduct internal audits and investigations;
- 5.1.10. to provide insurance and to process insurance claims;
- 5.1.11. to verify information provided by a data subject or business.

6. Special Personal Information

In the case that Special Personal Information must be processed, the Company will do so in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable laws.

7. Information Sharing

7.1. Personal Information will be shared with –

- 7.1.1. 3rd party service providers who provide services to the Company under a signed agreement (“SLA”), which includes a due diligence under an NDA and POPIA registration with IRSA, including but not limiting to information and actions that is supporting, operating, securing and hosting of information technology systems, providers of customer experience services, payment processing, order fulfilment, product management, logistics and returns, debt collection, document and information storage;
- 7.1.2. The Company’s professional advisors (Financial, Business and Legal);
- 7.1.3. Law enforcement, government officials, or other 3rd parties as may be necessary or appropriate in connection with an investigation of fraud, intellectual property

infringements, or other activity that is illegal or may expose the Company to legal liability;

- 7.1.4. 3rd parties (such as a potential purchaser and its professional advisors) in the event of any reorganisation, merger, divestiture, acquisition, consolidation, restructure, sale, joint venture, or other disposition of any or all of our assets.

8. Personal Information of Children

We do not intentionally collect Personal Information from children under the age of 18 years.

9. Retention of Information

- 9.1. The Company will retain Personal Information for a period not exceeding the lifecycle of a specific area of operations.
- 9.2. Personal Information may be held for longer periods where -
 - 9.2.1. retention of the record is required or authorised by law;
 - 9.2.2. the company reasonably require the record for lawful purposes related to the Company functions or activities;
 - 9.2.3. retention of the record is required by a contract between the parties; or
 - 9.2.4. a data subject / business has consented to the retention of the record.

10. Security of PI

- 10.1. The Company secures the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of Personal Information and unlawful access to or processing of Personal Information.
- 10.2. In order to ensure such security, the company has in place policies, controls and related processes, which are reviewed and updated on a regular basis.
- 10.3. The company's policies, controls and procedures cover (but not limited) to:
 - 10.3.1. physical, technical and network security;
 - 10.3.2. access controls and monitoring access;
 - 10.3.3. secure storage, destruction and encryption of records of Personal Information;
 - 10.3.4. Personal Information security incident reporting and remediation;

- 10.3.5. by way of written agreements, imposition of security and confidentiality obligations on Operators and reserving the right to audit their systems to ensure compliance with such obligations.

11. Cookies

- 11.1. The Company will place small text files called 'cookies' on devices when visiting the Company's website. Cookies do not contain Personal Information, but they do contain a personal identifier allowing the Company to associate Personal Information with a certain device.
- 11.2. The Company uses the following types of cookies on the website:
 - 11.2.1. **Essential cookies** which are crucial to a user's experience of a website, enabling core features functions;
 - 11.2.2. **Performance cookies** which track how an individual use a website during a visit. This information is typically anonymous and aggregated and helps the Company understand visitor usage patterns, identify and diagnose problems users may encounter, and make better decisions in improving the overall website experience;
 - 11.2.3. **Functionality cookies** which are used to collect information about a device and any settings which may configure on the Website visiting (like language and time zone settings). With this information, websites can provide a customized, enhanced, or optimized content and services.
- 11.3. A web browser can be set to allow a person to control whether to accept or reject cookies, or to notify a person each time a cookie is sent to a browser. In the case whereby the browser is set to reject cookies, websites that are cookie-enabled will not recognize the device when returning to the website, and some website functionality may be lost.

12. Consent to Cookies is required

12.1. An Individuals Rights

- 12.1.1. A person has the right to -
 - 12.1.1.1. request a record of Personal Information, which is kept by a Company. In terms of the PAIA, No 4 of 2000, the company may charge a fee to provide such a records. The Company will provide an individual with the costs associated with the type of information requested, if such request is made in terms of the Act

(form C), which can be obtained from the Company and / or the Act itself.

- 12.1.1.2. The Company may not provide you with what Personal Information it has in possession, e.g. to protect (a) the privacy of others; (b) confidential information of third parties; (c) the safety of others;
 - 12.1.1.3. request correction of Personal Information if it is inaccurate, irrelevant, excessive, misleading or obtained unlawfully;
 - 12.1.1.4. request deletion or de-identification of Personal Information where there is no lawful basis to retain it or where it has reached its natural lifecycle;
 - 12.1.1.5. withdraw consent previously given in respect of the processing of Personal Information. Withdrawal of consent may limit the Company's or a third party's ability to carry out certain functions in respect of a commercial relationship.
- 12.2. The Company will comply with the request from an individual unless the Company has a reasonable explanation why it cannot comply.
- 12.3. Where a request is received but the Company cannot comply on legal grounds, such request will be noted in the annual report, indicated the respective request and the reasons for declining the request.
- 12.4. Where a change to the Personal Information impacts any earlier decisions, if reasonably practicable, the Company will inform all persons to whom the Personal Information has been disclosed of those steps.
- 12.5. All requests can be made via email to the Information Officer and / or the Deputy Information Officer as outlined in clause 1.5.

13. Right to withdraw consent

- 13.1. In the limited circumstances where processing of Personal Information is based on consent, the data subject will have the right to withdraw such consent at any time in writing.
- 13.2. Once the Company is notified of such withdrawal of consent, the Company will no longer have the authority to store, gather or process information.

14. Lodging of Complaints at the Information Regulator (IRSA)

- 14.1. A person / data subject has the right to lodge a complaint in respect of the Company's non-conformance / non-compliance to either the Policy, Code of Conduct or this Privacy Notice.
- 14.2. Such Complaints can be lodged at <https://www.justice.gov.za/infoereg> or www.justice.gov.za.

15. Transborder information aligned to GDPR

- 15.1. The Company is a global business and may transfer certain Personal Information across geographical borders to -
 - 15.1.1. MJSC Group companies;
 - 15.1.2. Service providers for the purposes as set out above;
 - 15.1.3. verify and undertake risk assessments of new Vendors/Customers.
- 15.2. In the case that a transfer of Personal Information is required outside of South Africa, the Company assures each individual that it does so in accordance with the requirements for lawful transfer outside of South Africa as set out in the Protection of Personal Information Act No.4 of 2013 ("POPIA").
- 15.3. As part of a global company, in the operation of the business outlook, it uses several centralised functions and systems across the Group.
- 15.4. By undersigning this acknowledgement an individual consent to the transfer Personal Information outside of South Africa across geographical borders for the purposes set out hereto.