

Paysoft Proprietary Limited (Registration No. 2012/167867/07), its affiliates (including Paysoft Financial Solutions (Pty) Ltd 2019/492437/07 and Paysoft Card Solutions (Pty) Ltd 2015/086379/07), and our licensors, are the providers of various payment, collection and verification services (“**Paysoft**”, “**we**”, “**us**” or “**our**”). We are committed to ensuring the protection of the privacy of all visitors (“**Visitors**”) to our website at paysoft.co.za and secure.paysoft.co.za (the “**Website**”), and client services portal (“**Portal**”), as well as all persons (“**Users**”) who use any of the services we offer (“**Services**”).

If you have questions or complaints regarding our privacy policy or practices, please contact us by telephone on 021 555 1962 or email us at contactus@paysoft.co.za. This privacy policy (this “**Policy**”) describes the ways in which we collect, store, use and protect the personal information of our Visitors and Users. Throughout this Policy, we use the term “personal information” to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific person (also known as de-identified information).

Each User and Visitor needs to accept all the provisions in this Policy when using our website, our Portal and if signing up for any of our Services. If you do not agree with anything in this Policy, then you may not use our Website, use our Portal, register and/or use any of the Services.

You may not access the Website, Portal or use the Services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts. We do not have any intention of collecting or processing any personal information from individuals under 18 years of age.

By accepting this Policy, you are deemed to have read and agreed with all the provisions thereof.

1 CHANGES TO PRIVACY POLICY

We may amend this Policy at any time by posting a revised version on our Website and Portal. The revised version will apply to Visitors with effect from the time we post it. However, we will provide our Portal Users with prior notice of any such revision by providing you advance notice of the change, provided that if a User is not happy with the revisions made, he/she/it shall be entitled to terminate the Services subscribed for.

2 GENERAL INFORMATION ABOUT EVERYONE

2.1 Types of Information we collect

As a Visitor or User, you agree that we may electronically collect, store and use the following of your information for the purposes set out in clause 2.3 below:

- 2.1.1 internet usage information, including your Internet Protocol address (“**IP Address**”), browsing habits, click patterns, unique user ID, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search

engine keywords, JavaScript enablement, the content and pages that you access on the Website or Portal, and the dates and times that you visit the Website, or Portal, paths taken, and time spent on sites and pages within the Website, or Portal (“**Usage Details**”); and

- 2.1.2 additional information you may provide on a voluntary basis, such as demographic information or information related to your favourite social networking site (e.g. the site name, address and description), or information relating to your participation in competitions, promotions, surveys, and/or additional services (“**Optional Details**”).

2.2 How we collect such information

- 2.2.1 Voluntarily provided by you: Optional Details may be submitted by you to us if you decide to upload or download certain content (or products) from the Website or Portal, enter competitions, take advantage of promotions, respond to surveys, register and subscribe for certain additional services, or otherwise use the optional features and functionality of the Website, or Portal.

- 2.2.2 Automatically gathered via various technologies:

- 2.2.2.1 **“Cookies” Information:** When you access the Website or Portal, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your device to collect certain Usage Details. Paysoft may use both session cookies (which disappears after you close your browser) and persistent cookies (which remain after you close your browser which can be removed manually) and may be used by your browser on subsequent visits to the Website or Portal. Please note that the use of cookies is standard on the internet and many major websites use them. Please review your web browser “Help” file to learn more about modifying your cookie settings.

- 2.2.2.2 **Other tracking technology:** When you access the Website or Portal or open one of our HTML emails or message links, certain Usage Details may be automatically collected and recorded by us from your system by using different types of tracking technology.

- 2.2.2.3 **Web Beacons:** Our Website may contain electronic image requests (called a “single-pixel gif” or “web beacon” request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Web beacons are typically 1-by-1 pixel files (so small that you would likely not realize that they are there), but their presence can usually be seen within a browser by clicking on “View” and then on “Source.” We may also include web beacons in HTML-formatted newsletters that we send to opt-in subscribers in order to count how many newsletters have been read. Paysoft web beacons do not collect, gather, monitor or share any personally identifiable information about our Users, they are just the technique we use to compile anonymous information about the Website and Service usage.

2.3 The purpose for which we collect this information

- 2.3.1 We may use any **Optional Details** provided by you for such purposes as indicated to you at the time you agree to provide such Optional Details. We do not verify the accuracy of the information you provide to us, and it remains your responsibility to ensure correctness of the information supplied.

- 2.3.2 We may use your **Usage Details** to:

- 2.3.2.1 automatically provide you with the latest version of the Paysoft solution;
- 2.3.2.2 remember your information so that you will not have to re-enter it during your visit or the next time you access the Website or Portal;
- 2.3.2.3 monitor aggregate Website usage metrics such as total number of visitors and pages accessed; and
- 2.3.2.4 track your entries, submissions, and status in any promotions or other activities in connection with your usage of the Website or Portal.

NOTE: Some of our business partners (e.g. advertisers or platform providers) use their own cookies and/or widgets on our Website, and Paysoft has no access to or control over such cookies or widgets. (Widgets are interactive mini-programs that run on our Website to provide specific services from another company (e.g. displaying the news, opinions, music, etc) and these widgets may collect certain of your personal information (e.g. your email address). Cookies may also be set by the widget to enable it to function properly.) Information collected by any such cookie or widget is governed by the privacy policy of the company that created it, and not by Paysoft. **This Policy covers the use of cookies by Paysoft only and does not cover the use of cookies or widgets by any third party advertisers or partners on the Website.**

3 INFORMATION ABOUT USERS

3.1 Types of information we collect about Users

If you are a User, you agree that we may also electronically collect, store and use the following of your information:

- 3.1.1 name and surname, identity number, language, bank account information, payment records and statements, and director and authorized employee information provided to us ("**Personal Details**");
- 3.1.2 mobile number and email address ("**Contact Details**").

3.2 How we collect information about Users

Your Personal Details, and Contact Details are provided by you directly to us during your registration as a User and/or thereafter by your actively updating or supplementing such details in your User Account.

3.3 The purposes for which Paysoft collects the information

Paysoft uses the information that Users provide (or that we collect) to operate, maintain, enhance, and provide all of the features of the Services. **More specifically:**

- 3.3.1 We use your **Personal Details** to identify you when you access your User Account, to manage and administer your use of the Services.
- 3.3.2 We use your **Contact Details** to verify your identity and to inform you of facts relating to your use of the Services (e.g. notifications regarding major updates or content you have posted or downloaded from the Website, User service notifications, and to address copyright infringement or defamation issues) as well as to inform you, subject to obtaining your prior

consent, of competitions, promotions and special offers from us and/or our partners and/or affiliates.

4 HOW WE PROTECT & STORE PERSONAL INFORMATION

- 4.1 We store and process the personal information of our Users and Visitors on cloud based servers (Cipherwave and Microsoft Azure) that are protected by firewalls and data encryption. The Paysoft Portal stores no data on the mobile device or computer and communicates with the cloud servers through Secure Socket Layers (SSL's). We authorize access to personal information only for those employees who require it to fulfil their job responsibilities.
- 4.2 You should not divulge your account password to anyone. **Paysoft will never ask you for your password or PIN in an unsolicited telephone call or e-mail.** YOU ARE RESPONSIBLE FOR MAINTAINING THE SECRECY OF YOUR UNIQUE PASSWORD, ACCOUNT INFORMATION AND LINKED BANK ACCOUNT INFORMATION AT ALL TIMES.
- 4.3 If you are a legal entity and not an individual, we will liaise only with your named contact or alternative contact provided by your named contact in your application form. It is your responsibility to let us know of any changes to your named contact.

5 HOW WE SHARE PERSONAL INFORMATION WITH OTHERS

5.1 We may share your personal information with:

- 5.1.1 Other divisions or companies within the group of companies to which we belong which may include companies registered in countries other than South Africa, so as to provide joint content and services like registration, transactions and User support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services and communications. Members of our corporate family will only use this information to send you marketing communications if you have requested their services;
- 5.1.2 Service providers under contract who help with parts of our business operations (fraud prevention, marketing, technology services). Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit;
- 5.1.3 Service providers and/or financial institutions that we partner with to jointly create and offer products and services. These organisations may only use this information to market Paysoft-related products, unless you have given consent for other uses;
- 5.1.4 Companies that we plan to merge with or be acquired by. (Should such a combination occur, we will require that the new combined entity follow this Policy with respect to your personal information. If your personal information could be used contrary to this Policy, you will receive prior notice);
- 5.1.5 Law enforcement, government officials, fraud detection agencies or other third parties when –
 - 5.1.5.1 we are compelled to do so by a subpoena, court order or similar legal procedure;
 - 5.1.5.2 we need to do so to comply with any law; and/or

- 5.1.5.3 we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our User Agreement;
- 5.1.6 Other third parties, with your consent or direction to do so.
- 5.2 Paysoft will not sell or rent any of your personal information to third parties for their marketing purposes and only shares your personal information with third parties as described in this Policy.

6 HOW TO ACCESS, CHANGE OR DELETE YOUR PERSONAL INFORMATION

- 6.1 If you are a User of our Services, you can review any of your personal information at any time by signing in to your Account in the client Portal.
- 6.2 You also have the right to request access to your personal information, provided you provide us with proof of identity in a form acceptable to us. You may request that we (i) confirm, free of charge, whether or not we hold personal information about you; and (ii) provide you with record or a description of the personal information we hold about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information, and we will do this within a reasonable time; at a prescribed fee; in a reasonable manner and format; and in a form that is generally understandable.
- 6.3 Deleting your information:
 - 6.3.1 You can deactivate your account at anytime in accordance with the provisions of your contract with us.
 - 6.3.2 **Please note:** Even after you have deactivated your account, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, it was otherwise distributed pursuant to User's privacy settings, or it was copied or stored by other users or our partners.

Certain information may be retained for legal purposes and will only be held for so long as required by applicable law.

7 NON-PERSONAL INFORMATION

Notwithstanding anything contained in this Policy regarding your information, the following information is not regarded as personal information for purposes of this Policy:

- 7.1 Permanently de-identified information that does not relate and/or cannot be traced back to you specifically. We may compile, use, share and otherwise process such information as we deem fit.
- 7.2 Non-personal statistical information collected and compiled by us. We own and retain all rights in such information.
- 7.3 Information which you have provided voluntarily in an open, public environment or forum including (without limitation) any blog, chat room, albums, community, classifieds or discussion board. Because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this Policy. Since such public environments are accessible by third parties, it is possible that third parties may collect and

collate and use such information for their own purposes and you should accordingly be careful when deciding to share any of your personal information in such public environments.

8 YOUR CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION

By accepting this Policy, you consent to our collection, storage, processing and disclosure of your personal information as described in this Policy, for so long as you are a registered User of our Services. Should you terminate your registration with us and close your Account, you consent to our retention of the information we have already collected from you for record-keeping purposes only in accordance with applicable law.

9 HOW YOU CAN CONTACT US ABOUT PRIVACY RELATED QUESTIONS

If you have questions or concerns regarding this Policy, or you are aware that a minor under the age of 13 has provided us with personal information, you should contact us by us by using the contact link in any of the Paysoft pages or phoning us on 021 555 1962 or mailing us at Paysoft, Courtyard Building 2, West Park off Esplanade Road, Central Park, Century City, Cape Town, South Africa, or via email at contactus@paysoft.co.za.

10 PRINCIPLES

Principle 1: Accountability

- Paysoft takes reasonable steps to ensure that personal information obtained from clients is stored safely and securely.
- This includes contact details, financial information, and any other personal information that may be required for the purpose of providing its services to the client.

Principle 2: Processing limitation

- Paysoft will collect personal information directly from clients.
- Paysoft will only process or release client information with their consent, except where it is required to do so by law.

Principle 3: Specific purpose

- Paysoft collects personal information from clients for the purpose of rendering its services which include
 - Payments
 - Collections
 - Account verification
 - Card registration
 - Staff loans
 - Statements

Principle 4: Limitation on further processing

- Personal information will not be processed further in a way that is incompatible with the purpose for which the information was collected initially. Paysoft collects personal information for the purpose of rendering financial services, and it will only be used for that purpose.

Principle 5: Information quality

- Paysoft will take reasonable measures to ensure that client information is complete, up to date and accurate before it is used. It remains your responsibility to ensure correctness of the information supplied.

Principle 6: Transparency/openness

- In the instance that personal information is collected from a source other than directly from a client, (E.g., credit checks, AML checks, Astute checks, other portals) The client will be made aware:
 - That their information is being collected
 - Who is collecting their information by giving them our details
 - Of the specific reason that you are collecting their information.

Principle 7: Security safeguards

- Paysoft will ensure technical and organisational measures to secure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof. Personal information will also be protected against any unauthorised or unlawful access or processing. Paysoft is committed to ensuring that information is only used for legitimate purposes with client consent and only by authorised employees and third parties which have been disclosed.

Principle 8: Participation of individuals

Clients are entitled to know particulars of their personal information held by Paysoft as well as the identity of any authorised employees that had access thereto. They are also entitled to correct any information held by Paysoft.