



PRIVACY NOTICE

1. INTRODUCTION

ACCOUNT-A-TRAK takes data privacy very seriously. We respect the privacy of our stakeholders and we endeavor to abide by data privacy laws where applicable.

ACCOUNT-A-TRAK is a consulting company focusing on strategy execution in the SME market and has its head office in Pretoria, South Africa.

The purpose of this Privacy Notice is to describe the way that ACCOUNT-A-TRAK collects, stores, uses, and protects information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person.

2.WHO DOES THIS PRIVACY NOTICE APPLY TO?

This Privacy Notice applies to you if you are a visitor to any of ACCOUNT-A-TRAK's websites (listed below)

List of ACCOUNT-A-TRAK 's Websites –

<https://acct-a-trak.com/>

("Electronic Platforms").

3. TERMINOLOGY

Responsible Party means the person who determines the purposes and manner in which Personal Information will be processed. In some Jurisdictions, this is referred to as the *Data Controller*;

Data Subject means the person to whom Personal Information relates;

Personal Information means information relating to an identifiable, natural living Data Subject (and in South Africa, specifically also includes existing juristic persons). Personal information includes:

certain information that we collect automatically when you visit our website;
certain information collected on registration (if applicable);
optional information that you provide to us voluntarily (see below);

but excludes:

information that has been made anonymous so that it does not identify a specific person;
permanently de-identified information that does not relate or cannot be traced back to you specifically;
non-personal statistical information collected and compiled by us; and
information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, 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 Privacy Notice).





Common examples of the types of Personal Information which we may collect, and process include your:

identifying information – such as your name, date of birth, or identification number of any kind;
contact information – such as your phone number or email address;
location information – such as your device's geolocation and other information related to your location which can be obtained through your IP address or if you give it to us to use;
address information – such as your physical or postal address; or
demographic information – such as your gender or marital status

Depending on the goods or services that you require, we may also collect Special Personal Information including your:

financial information – such as your bank account details;
demographic information – such as your race or ethnicity;

4. ACCEPTANCE OF THIS PRIVACY NOTICE

Acceptance required

You automatically accept the terms of this Privacy Notice when you register an account, purchase goods or services, or generally use (including for information and announcement purposes) the Electronic Platforms.

You may not use any of the Electronic Platforms if you do not agree with anything in this Privacy Notice.

Legal capacity

You may not use the Electronic Platforms if you are younger than 18 years old or do not have the legal capacity to conclude legally binding contracts.

Deemed acceptance

You are deemed to have read, understood, accepted, and agreed to be bound by all the terms of this Privacy Notice if you continue to use any of the Electronic Platforms.

Your obligations

You may only send us your own Personal Information or the information of another data subject where you have their permission to do so.

5. CHANGES TO THIS PRIVACY NOTICE

We may change the terms of this Privacy Notice at any time. We will notify you of any changes by placing a notice in a prominent place on the website or by email.

If you do not agree with the changes, then you must stop using the Electronic Platforms. If you continue to use any of the Electronic Platforms, then the changed terms will apply to you and you will be deemed to have accepted those updated terms.

6. HOW IS PERSONAL INFORMATION COLLECTED?

On registration



You will no longer be anonymous to us if you register a profile on any of the Electronic Platforms or when you voluntarily provide us with your Personal Information. You may be required to provide us with certain Personal Information or Special Personal information including:

your name and surname;
your email address;
IP address;
your telephone number;
your company name, company registration number, and VAT number;
your postal address or street address;
your username and password; account number;
banking details such as credit card, debit card, and CVV information;
loyalty card or program details;
electronic and/or digital signatures; and
location information.

We will use this Personal Information to fulfill your account or provide additional services and information to you as we reasonably think appropriate or as requested by yourself, and for any other purposes set out in this Privacy Notice.

We may also use this information to evaluate your information on your recent visits to our Electronic Platforms. We may analyze how you move around different sections of our Electronic Platforms which we may then use to make your user experience more intuitive and improve our ability to market our products to you.

On order or request

When you order our goods or request our services from us, you will be asked to provide us with additional information voluntarily.

From a browser

We automatically receive and record internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, color capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website and your location. Please note that other websites visited before entering our website might place Personal Information within your URL during a visit to them, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some Personal Information.

Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain Personal Information, but they do contain a personal identifier allowing us to associate your Personal Information with a certain device. These files serve several useful purposes for you, including:

granting you access to age-restricted content (if applicable);
tailoring our website's functionality to you personally by letting us remember your preferences;
improving how our website performs;



allowing third parties to provide services to our website; and helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

Third-party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets may be governed by the Privacy Notice of the company that created it, and not by us.

Web Storage

In some instances, some web applications can also store information on the web browser that the person is using. They perform a very similar function to cookies with the exception that no files are created with web storage.

We do not use web storage to collect any Personal Information.

Some of our partners may use web storage. Information collected by our business partners may be governed by the Privacy Notice of the company that created it, and not by us.

Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon requests) that allow us to count page views and access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor, or share any of your Personal Information. We merely use them to compile anonymous information about our website.

Optional details

You may also provide additional information to us voluntarily (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

Recording calls

Our Customer Service Centre records all outgoing and incoming telephone calls.

We may monitor and record any other telephone calls that you make to us or that we make to you unless you specifically request us not to.

Consent to collection

Where applicable, we will obtain your consent to collect Personal Information under applicable law.

Per Terms and Conditions



Your usage of the Electronic Platforms is always subject to the Terms and Conditions that you are required to accept before proceeding to use their functionality. You are required to familiarize yourself with the content of these contractual provisions before accepting their terms and using the Electronic Platforms.

7. USE OF PERSONAL INFORMATION

We will use the following types of information for the reasons listed below –

your name and surname;
your email address;
IP address;
your telephone number;
your company name, company registration number, and VAT number;
your postal address or street address;
your username and password; and
location information.

Contractual obligations

We may use your Personal Information to fulfill our contractual obligations to you. This includes our contractual obligations to provide you with goods or services that you may obtain via our Electronic Platforms. It also includes the contractual obligations that you enter when you accept our Terms and Conditions.

We may also use your physical address. We will provide your contact details, physical address as well as name and surname to facilitate the delivery of goods and/or services that you purchase via the Electronic Platforms.

Messages and updates

We may send administrative messages and email updates to you about any of our websites. In some cases, we may also send you promotional messages. You can choose to opt out of promotional messages.

Targeted content

While you are using any Electronic Platforms, we may display targeted adverts, recommendations, and other relevant information based on your Personal Information, location, and past consumption of our own goods and services. In a completely automated process, computers process the Personal Information and match it to adverts, promotions, communications, or related information.

We never share Personal Information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any Personal Information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send Personal Information to advertisers with the referring URL. Once you are on the advertiser's website, however, the advertiser can collect your Personal Information.

Marketing purposes

We may use the information that you provide us to get in touch with you to explore potential business opportunities or to engage in further business with you or pursue lawful marketing-



related activities (i.e. promotional messages). You can choose to opt out of promotional messages.

Financial Information

We may collect information such as your bank account number, credit card, debit card, and CVV information, loyalty card, or loyalty program details. We collect this information when you register to use our app (still to be developed)

Bank Card numbers and CVV numbers are maintained by a third-party payment processing service provider and are not retained in ACCOUNT-A-TRAK's environment.

This information is collected and utilized to fulfill our contractual obligations to you.

8. USE OF SPECIAL PERSONAL INFORMATION

ACCOUNT-A-TRAK will only process Special Personal Information where:

explicit consent to the processing of your Special Personal Information for specific purposes is given; or
such processing is legally required by, or necessary for ACCOUNT-A-TRAK or for you to exercise rights under other applicable law.

The following are some of the reasons why we collect Special Personal Information -

Demographic Information

We may collect information such as your race or ethnicity when you register to use our mobile applications or when you apply to participate in a promotional competition. We collect this information to have a better understanding of our customers to provide you with the best customer experience possible. We collect this information with your consent.

9. DISCLOSURE OF PERSONAL INFORMATION

Sharing

We share your Personal Information with:

our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including delivery of product, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
financial service providers who process, authenticate and secure any payments that are made on Electronic Platforms;
loyalty program partners who process and authenticate transactions that you link to your loyalty program;
third parties that help store, authenticate and transmit electronic signatures;
credit bureaus to report account information, as permitted by law; and
other third parties who provide us with relevant services where appropriate.

Regulators





We may disclose your Personal Information as required by law or governmental audit.

Law enforcement

We may disclose Personal Information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

No selling

We will not sell Personal Information. No Personal Information will be disclosed to anyone except as provided in this Privacy Notice.

Marketing purposes

We may disclose aggregate de-identified statistics (information about the customer population in general terms) about the Personal Information to advertisers or business partners.

Employees

We may need to disclose Personal Information to our employees that require the Personal Information to do their jobs. These employees include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the Personal Information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your Personal Information migrating to a new owner, you may request us to delete your Personal Information, provided that another law does not oblige us to keep it.

10. SECURITY

We take the security of Personal Information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to Personal Information only to those employees who require it to fulfill their job responsibilities. We implement disaster recovery procedures where appropriate.

11. ACCURATE AND UP TO DATE

We will try to keep the Personal Information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this Privacy Notice. From time to time we may request you to update your Personal Information on the website. You can review or update any Personal Information that we hold on you by emailing us or phoning us. Please note that to better protect you and safeguard your Personal Information, we may take steps to verify your identity before granting you access to your account or making any corrections to your Personal Information.

Throughout your interaction with us, you retain the right to rectify Personal Information of yours that is inaccurate. This does not apply if we process your Personal Information in our capacity as



an operator or processor on behalf of someone else (i.e. the Responsible Person, who determines the purposes and means of our data processing).

Please refer to ACCOUNT-A-TRAK's POPIA Manual for more information on how to access your Personal Information. You can find the PAIA Manual at <http://www.acct-a-trak.com/Legal notices/>

12. RETENTION OF PERSONAL INFORMATION

We will only retain your Personal Information for as long as it is necessary to fulfill the purposes explicitly set out in this Privacy Notice, unless:

retention of the record is required or authorized by law; or
you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non disclosure obligations and will not share or sell your Personal Information.

We may retain your Personal Information in physical or electronic records at our discretion.

13. TRANSFER TO ANOTHER COUNTRY

The Electronic Platforms are hosted on the Microsoft cloud platform which has services located in the European Union and South Africa.

Before transferring Personal Information across borders, we take steps to ensure that the third party who is the recipient of the information is –

located in a country that provides an adequate level of protection for your Personal Information;
or
subject to an agreement or binding corporate rules which satisfy the applicable requirements for the transfer of personal data across borders.

Personal Information may also be disclosed where we have a legal duty or a legal right to do so.

14. UPDATING OR REMOVING

You may choose to correct or update the Personal Information you have submitted to us, by contacting us by phone or email.

Please refer to ACCOUNT-A-TRAK 's POPIA Manual for more information on how to access your Personal Information. You can find the POPIA Manual at <http://www.acct-a-trak.com/Legal notices/>

15. RESTRICTION OF PROCESSING

You may request that we restrict the use of your Personal Information. When we restrict your Personal Information, we still have the right to store it but not use it. You can ask that we do this in writing by clearly describing what information you wish us to restrict as well as how you wish us to restrict our usage. We will respond to the request within 30 days.



Please refer to ACCOUNT-A-TRAK 's PAIA Manual for more information on how to access your Personal Information. You can find the PAIA Manual at <http://www.acct-a-trak.com/Legal notices/>

We may not be able to restrict the usage of the Personal Information where we are legally or contractually required or allowed to process the Personal Information.'

16. DATA PORTABILITY

We may facilitate the transfer of your Personal Information if you ask us to transfer your data to another Responsible Person to the extent required by law. We will, to the extent possible or required by law, pass on all your Personal Information that you have given us to the new Responsible Person in a commonly used format.

17. DATA BREACHES

We will notify you of any confirmed data breaches that have occurred to the extent required and/or permitted by law. We will also notify the relevant supervisory authority or information regulator and any affected data subjects of the data breach to the extent required by law.

18. LIMITATION OF OUR RESPONSIBILITY

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

19. YOUR RIGHTS

Data Subjects have the right to have Personal Information processed lawfully. Your rights include the right to –

be notified that your Personal Information is being collected or that your Personal Information has been accessed or acquired by an unauthorized person – refer to paragraph 17 above;

to find out what Personal Information we have about you and to request access to your Personal Information;

to request us, where necessary, to correct, destroy or delete your Personal Information;

to object, on reasonable grounds, to the processing of your Personal Information;

to object to the processing of your Personal Information for purposes of direct marketing, including by way of unsolicited communications. Note, however, that ACCOUNT-A-TRAK does not use your information for marketing purposes without your prior consent or where your information is collected in the course of a relevant commercial transaction;

not to be subject, in certain circumstances, to a decision which is based solely on the automated processing of your Personal Information;

to submit a complaint to the Information Regulator if you believe that your rights relating to your Personal Information have been infringed or if you believe that an independent adjudicator who may be resolving your complaint against us, has not decided the matter correctly; and

to institute civil proceedings against us if you believe that your rights relating to your Personal Information have been infringed.

20. ENQUIRIES AND HOW TO COMPLAIN





Any questions, complaints, or concerns arising from this Privacy Notice or how we handle Personal Information should be directed to the ACCOUNT-A-TRAK Information Officer. Our contact details are available at the following website <https://acct-a-trak.com/> or an email can be sent to the following address leander@acct-a-trak.com.

