



INFORMATION PROCESSING POLICY

This policy explains how we obtain, use, and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

We are committed to protecting the privacy of the users of our web site and the services we offer here. We respect rights to personal information. For this reason, we have developed this policy to govern our processing of personal information. This document sets out:

- (a) How we collect personal information;
- (b) What types of personal information we collect and hold about;
- (c) The purposes for which we use such personal information;
- (d) Rights with respect to the personal information held by us.

Who we are

When we refer to "we", "us" or "our" herein we are referring to Spinnaker Software (Pty) Ltd (Registration Number 2021/601210/07) and its affiliated group companies, or any of them, as the context requires. Our principal place of business is at Unit 1A, Netcash Square, 64 Parklands Main Road, Parklands and you can contact us via telephone at +27 (0)21 556 2724 or electronic mail at privacy@archsoftware.co.za.

Whose information we protect

When we refer to "you" or "your" herein we are referring to you, the potential user or user of our products and services.

How we collect information

We may collect information about you directly from you as well from third parties and publicly accessible sources. The means and sources we may use to collect information about you are as follows:

- (a) From you, when you enquire about, subscribe to or make use of our products or services;
- (b) From public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) From our business partners and the persons employed by us to provide services for us, which may include debt collection services, communications services and data hosting, processing and management services;
- (d) From such persons or entities which may be legally entitled to provide us with information about you; and
- (e) From persons or entities which you may consent to providing us with information about you.

Information we hold about you

We record and hold the following types of information about you:

- (a) Details of when you contact us and when we contact you, including the IP addresses when you contact us via electronic mail or through our website, electronic mail addresses and telephone numbers you contact us from as well as the content of the communications between us, which we may record;
- (b) All information contained in the forms, requests or orders you submit to us, via electronic mail, our website or using any other means, including any information about your clients, the services or products you may provide and any amounts chargeable or owing to you in respect thereof;
- (c) Details about you or your personnel or clients which you provide to us to register with us or that are collected or arise in the course of the delivery of services;
- (d) Details about your preferences and usage of our products or services;
- (e) Information received pursuant to our enquiries with public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (f) Details of your preferences regarding our services and offerings, including which of our services you have made enquiries with us about.

We may hold your personal information for at least 5 years calculated from the date of collection, or for the term of services and 5 years thereafter, as the case may be, subject thereto that in either case we shall not hold your personal information for a period which exceeds the maximum period permitted by applicable law.

The purposes for which we use your personal information

Certain of the information which we collect about you, as identified below, we need to use in order to facilitate the delivery of products or services to be rendered to or by us and to exercise our rights under the agreements we may have with you with respect thereto. If we do not have the right to use such information it may not be possible for the products or services to be delivered or for us to process proposals or requests related thereto. Such information includes:

- (a) Your name, contact details, identity number, place of residence and bank account details;
- (b) Your proposals, requirements and preferences regarding the products or services to be delivered;
- (c) The information which you submit to us or that we collect or generate in the course of the delivery of the products or services;

Information about you that we hold and do not need for purposes of receiving or providing products or services, and which we make use of based on your consent, will be used by us only for the purposes as approved by you. We may also use information we hold about you for purposes required by or as permitted under applicable law.

We may collect and process your information for the following purposes:

- (a) To process your proposals to render products or services to our business and/or your requests for products and services from our business and to make related decisions, including by verifying your identity, credit status, contact details, track record and otherwise ascertaining that you qualify as supplier or client for our business;
- (b) To take such actions as may be required to facilitate delivery and improve the products and services provided by us and to exercise our rights and comply with our legal obligations in respect thereof, including by processing and recording all product orders and service requests, communicating with your and our staff and contractors regarding products and/or services and to facilitate payments that may be owing to you or to us;
- (c) To contact you regarding product or service updates (including security updates) or share information related to the functionality, implementation, operation or use of products or services;
- (d) To ensure that the information we receive and hold about you is accurate, complete and up to date;
- (e) To prevent, investigate and prosecute fraud, money laundering, terrorism, abuse of our services and other unlawful activities;
- (f) To comply with legal and regulatory requirements, for audit purposes and legal proceedings;
- (g) To conduct market research and business analysis, understand your preferences, learn more about the products and services that you offer or are interested in and improve the products and services we offer to you;
- (h) To inform and provide you with news, special offers and opportunities to participate in competitions or to make use of other products, services and benefits that we offer and that we believe may be of interest to you unless you have opted not to receive such information in the prescribed manner;
- (i) For data analysis, identifying usage trends and to determine the effectiveness of our promotional campaigns; and
- (j) For such other purposes as you may consent to or as may otherwise be lawfully permitted, including for the purposes of protecting our and/or your legitimate interests and/or that of our suppliers and other customers.

Please note that we will not contact you telephonically for unsolicited marketing purposes or send unsolicited marketing communications to you by facsimile, SMS or electronic mail if you have objected to receiving such communications by way of a public register recognised for such purposes by law or by notifying us of your objection in the prescribed manner. We will provide you with reasonable opportunities to object to receiving marketing communications in the manner prescribed by law, including upon application for our services and on each occasion when we send you such communications.

Sharing your information

Keeping your personal and financial information secure is one of our most important responsibilities. We cannot disclose your information unless legally permitted thereto. Save as set out below, we will not transfer your information to a third party without your consent unless legally obliged thereto. In particular, we do not sell lists or databases with our clients' information and will not provide any of your information to entities outside our group so as to permit them to market their products or services to you. You agree that we may transfer your information to the following people and organisations, who may be located inside or outside South Africa, in pursuit of the data processing purposes to set out in this policy:

- (a) To all persons in our employ or in the employ of our affiliated companies, including to our directors, employees, contractors, agents, auditors, legal and other professional advisors and of our affiliated companies;
- (b) To governmental, judicial, regulatory and law enforcement bodies and agencies;
- (c) To persons that are engaged by us to assist us in providing services to you who are obliged to ensure that your information is kept secure;
- (d) To our clients that are authorised to make use of the services you provide to us;
- (e) To any person to whom we subcontract, cede, delegate, transfer or assign any of our rights or obligations pertaining to the services provided to you or contracts concluded with you;
- (f) To any person that is duly authorised to represent you or to act in your stead such as a liquidator, business rescue practitioner, legal guardian, executor or curator;
- (g) To credit bureaus and fraud prevention agencies, provided that we will notify you in advance before we provide adverse information about you to a credit bureau and, upon request, provide you with a copy of such information as required by law;
- (h) To such other persons as may be permitted by applicable law or that you may consent to.

Security

We will strive at all times to ensure that your records will always be protected against unauthorised or accidental access, processing or loss. We maintain this commitment to data security by implementing appropriate reasonable technical and organisational measures to safeguard and secure your information, including to provide for:

- (a) Physical security.
- (b) Computer and network security.
- (c) Controlled access to personal information.
- (d) Secure communications.
- (e) Security in contracting out activities or functions.
- (f) Retention and disposal of information.
- (g) Acceptable usage of personal information.
- (h) Governance and regulatory issues.
- (i) Monitoring access and usage of private information.
- (j) Investigating and reacting to security incidents.

If we use a third party to host, manage or process your data on our behalf we will require that such third party also commit to implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we are

not prevented by a law enforcement or regulatory agency, we will notify you without undue delay if we believe that unauthorised access to your information may have occurred, providing you with such information as you may reasonably require to implement protective measures.

Web Sites

When you visit our web site we may also collect certain information about your usage preferences and history. Such information may be stored in a cookie on your computer's hard drive by your web browser. Cookies are intended to assist and improve your use of our web sites. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use all of the features of our site.

Every time you connect to our web sites we store web server logs which show your IP address (the unique number which your machine uses when it is connected to the Internet); what you looked at; whether the page request was successful or not, and which browser you used to view the pages. The use of this data is strictly for statistical and personalisation purposes only. This helps us understand which areas of the site are of particular interest and also which pages are not being requested. It also tells us how many hits and page requests we get.

Your rights regarding your information

Provided that you give us suitable and adequate proof of your identity, you have the right:

- (a) To know which records we hold about you;
- (b) If our right to process your personal information is based on your consent, to withdraw such consent at any time, provided that this shall not affect the lawfulness of processing which occurred prior to such withdrawal;
- (c) To object to the further collection, use, sharing or processing of your personal information by us at any time where such processing activities are not required by us to comply with our obligations under any agreement we have with you, to exercise our rights, or for such other purposes as may be required or permitted by applicable law; and
- (d) to require us to correct, erase or cease processing information or records we hold about you based on your consent, or that we are no longer permitted to retain, or which are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained;

Any of the above can be done by contacting us directly by any means provided by us, including by submitting a written request to us via email at privacy@archsoftware.co.za. You may be required to provide us with suitable proof of your identity before we provide you with any information. We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.

Complaints

Please notify us at privacy@archsoftware.co.za if you have any concerns about the processing of your personal information.

If your concerns are not satisfactorily resolved you may lodge a complaint with the South African Information Regulator at complaints.IR@justice.gov.za or +27 (0) 10 023 5200.