

PRIVACY POLICY**1. INTRODUCTION**

This Privacy Policy applies to the AKELO Group of Companies (“AKELO”, “Crossgate”, “2Engage”, “Retail Engage”, “bonsella”, “TuYu”, “Efficacy Payments”).

AKELO acknowledges the rights of privacy and dignity of all persons. This includes the right to protection of personal information. In compiling this policy, the statutory framework contained in the laws of South Africa, particularly the Bill of Rights and various other pieces of legislation were given due consideration.

Our Privacy Policy governs the way we, at AKELO and our subsidiary companies, treat and deal or process your personal information. We respect your privacy and undertake to treat your personal information as confidential. Our Privacy Policy explains how we use, collect and share your personal information. We undertake to ensure that all personal information will be protected from unauthorised access, loss or damage and respected as confidential by all staff members, contractors, volunteers or learners, and in the unfortunate event that your information is compromised; we will follow the process outlined in the Protection of Personal Information Act.

If you do not agree to the terms of this Privacy Policy, you may choose not to use any AKELO website, and/or products and services and not submit any personal information.

2. WHAT IS PERSONAL INFORMATION?

Personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- i. 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 the person;
- ii. information relating to the education or the medical, financial, criminal or employment history of the person;
- iii. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

- iv. the biometric information of the person;
- v. the personal opinions, views or preferences of the person;
- vi. 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;
- vii. the views or opinions of another individual about the person;
- viii. shall include consumer information; and
- ix. the name of the person if it appears with other personal information relating to the person or company, or if the disclosure of the name itself would reveal information about the person.

Personal information will be collected from you directly. We may also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal information but is not considered personal information in law as this information does not, directly or indirectly, reveal your identity.

3. PROCESSING OF PERSONAL INFORMATION PRINCIPLES

The following principles will be adhered to and considered when dealing with consumer rights.

- i. It is important to recognise for each process or decision that the following is considered before release of information.
 - a. Does it justify the purpose?
 - b. Is the minimum customer identifiable detail disclosed?
 - c. Access to information is on a need-to-know basis only.
 - d. Everyone working with customer information understands his/her responsibilities in this regard.
 - e. Compliance with the law is not negotiable.
 - f. AKELO may share your de-identified personal information for market, statistical, academic research and commercial purposes. We will take all reasonable measures to ensure that all data is anonymised before sharing and that all third party/parties involved abide by the strict de-identification and data protection protocols that we require.
- ii. AKELO may use your data directly or via a third party for marketing purposes and/or only where you have provided consent to the relevant third party to share your personal information, but explicit opt-out functionality will be available to manage your participation in these products and service offerings.

iii. To ensure continuous improving of the service offering, consumers may be asked to complete service experience questionnaires.

4. PURPOSES FOR WHICH AKELO USES YOUR PERSONAL INFORMATION

Any information collected from you may be processed for, amongst others, the following purposes:

- i. For marketing of related products or services, directly or via a third party;
- ii. To provide you with products and services best suited to your needs;
- iii. To process your orders;
- iv. To make an online appointment;
- v. To assess any additional services you may require;
- vi. To process any enquiries;
- vii. To detect, prevent or deal with actual or alleged fraud, security breach, or the abuse, misuse or unauthorised use of the website and/or contravention of this Privacy Policy.

5. RETENTION OF PERSONAL INFORMATION

All personal information will be archived as per regulatory requirements and our documented retention policy.

6. SECURING YOUR PERSONAL INFORMATION

AKELO takes the security of your personal information very seriously. AKELO recognise the vital role that information technology plays in its daily operations, and the reliance placed on information technology systems in processing personal information. Although absolute security cannot be guaranteed, AKELO will take reasonable technical and organisational measures to protect your personal information against accidental, unauthorised or intentional manipulation, loss, misuse, destruction, disclosure or access.

We have implemented procedures to deal with any suspected data security breach and will notify you and any relevant regulator of a confirmed breach where we are legally required to do so. AKELO will not be held liable under any circumstances if such information is compromised or disclosed through conduct outside the control of AKELO.

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

AKELO may disclose your personal information if (a) authorised to do so by law, (b) you have provided consent.

When AKELO shares your information with any third party, such third party will be required to respect your right to privacy and AKELO will take reasonable measures to ensure that your personal information is safeguarded. AKELO will only allow third parties to process your personal information for a specific purpose, in accordance AKELO'S instructions and applicable law.

8. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

AKELO stores your personal information on its servers and/or on third party servers. AKELO will take reasonably practicable steps to ensure that your personal information is adequately protected wherever it is stored.

9. OUR COOKIE POLICY

AKELO uses Cookies to understand and save your preference for future visits to our websites. A cookie is a small piece of data sent from our website to your computer or device or internet browser where it is saved. The cookie contains information to personalise your experience on our website and applications. The cookie has the ability to identify your device, computer or smart phone. By using our website and applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. We may use the cookie to enable us to know you visited our website. You have the right to choose whether or not to accept cookies. However, please note that if you do not accept our cookies, you may not access to the full functionality of our website or mobile applications.

10. LINKS TO OTHER WEBSITES

When you interact with any AKELO Group website, you will come across links to other websites and applications. AKELO is not responsible for the security of those websites, or the information that it contains. In some cases, links are provided as a value added service for information purposes only. Please remember that when you click on a link on the AKELO website and you are taken to another web page or website or application that this Privacy Policy will no longer apply. You also acknowledge that by clicking on a link, that you do so at your own risk and hold AKELO harmless against any loss or damage that may occur.

11. YOUR RIGHTS

AKELO will, at all times, process your personal information in accordance with applicable laws and your rights are set out below:

- i. You have the right to correct your personal information if it is incorrect;
- ii. You have the right to update your personal information if your details have changed;
- iii. You have the right to object to the processing of your personal information;
- iv. You have the right to your personal information being deleted; and
- v. You have the right to be informed if your information has been deleted.

You acknowledge that, in some cases, AKELO may not be able to comply with your request to delete or destroy your personal information if this request conflicts with applicable law.

12. REQUEST FOR ASSISTANCE REGARDING PRIVACY RIGHTS

- i. A data subject who wishes to object to the processing of personal information in terms of section 11(3) (a) of the Act, must submit the objection to AKELO on Form 1. AKELO will, through its Information Officer(s) or Deputy Information Officer(s) provide such reasonable assistance as is necessary, free of charge, to enable the data subject to make an objection on Form 1.
- ii. Request for correction or deletion of personal information or destruction or deletion of record of personal information must submit a request to the AKELO on Form 2. The information Officer(s) or Deputy Information Officer(s) will provide reasonable assistance free of charge.
- iii. All requests may be forwarded to pr@akelo.co

13. NOTIFICATION OF INCIDENTS TO THE INFORMATION REGULATOR

Where a data subject's information has been compromised, the notification form issued by the Information Regulator will be completed as soon as possible, notifying the Regulator. This responsibility will vest with the Information Officer of the AKELO Group for all entities.

14. INFORMATION OFFICER FOR GROUP

Information Officer: rikus@crossgate.co.za

15. CHANGES TO THIS PRIVACY POLICY

Our Privacy Policy and procedures are regularly reviewed and updated on our website.

Last updated: March 2023