

Privacy Policy in terms of the Protection of Personal Information Act, No. 4 of 2013 (POPIA)

PRIVACY STATEMENT AND POLICY

Aylett & Co. (Pty) Ltd acknowledges and respects your right to privacy and is committed to keeping your information private and confidential.

SCOPE

Your privacy is important to Aylett & Co. (Pty) Ltd ("Aylett & Co"). This Privacy Statement and Policy applies to the collection of personal information via products, services, websites, events operated by Aylett & Co. In general, you can visit our website www.aylett.co.za without having to divulge any personal information about yourself. However, while using our website you may provide information about yourself or it may be collected by us.

You may update personal information at any time by e-mailing us. You may also view your personal information that we hold and correct it if necessary on written request to Aylett & Co marked for the attention of the Information Officer.

Access to your personal information held by Aylett & Co may also be requested by yourself or third parties. The Promotion of Access to Information Act, 2 of 2000 regulates and sets out the procedure for such a request and under what circumstances such access may be refused.

WHAT PERSONAL INFORMATION IS COLLECTED AND HOW IS THAT INFORMATION USED?

Personal information is used as is appropriate in the normal course of business to provide the products and services you have requested. We may retain any information for purposes of reporting and administration, to monitor our site or to communicate directly with you.

We collect information about individuals, users and professional's in variety of ways including but not limited to direct from the individuals (for example, when ordering a product, registering an account, using the products, or signing up for a newsletter), from your employer, publicly available information, and through cookies, and/or similar technology.

We use the information primarily to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you.

We do not share with others any of the information you provide, unless we say so in this Privacy Statement, or when we believe in good faith that the law requires it.

HOW IS MY PERSONAL INFORMATION PROTECTED?

We take all reasonable steps to protect your personal information, which is held in a firewalled server. We can however not guarantee the security of any information you transmit to us electronically and you do so at your own risk.

- We maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the personal information you or your employer provides to us.

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- Aylett & Co seeks to ensure compliance with Data Protection/Privacy regulations, laws and industry best practices in respects to security around personal information.

If you are located in another country with data protection/privacy law, we may transfer your personal information to countries that may not guarantee the same level of protection for personal information as the one in which you reside. By giving your information, you consent to these transfers.

WHO HAS ACCESS TO THE PERSONAL INFORMATION?

- We will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except our approved agents, suppliers and contractors, or as otherwise described in this Privacy Statement.
- We will not disclose any personal information or information about your usage of our products, websites or mobile applications to unaffiliated third parties, except as necessary to enhance the product experience, service the legal agreement between us and your employer, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law.

HOW MAY YOU CORRECT, AMEND OR DELETE YOUR PERSONAL INFORMATION OR UPDATE YOUR PREFERENCES?

- You may amend update or delete your information at any time via the products or services, via the contact details provided or on our website contact page located at www.aylett.co.za.
- If you have any additional questions or concerns related to this statement and/or our practices, send us an email to the attention of the Information Officer.

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1 PURPOSE

- 1.1 This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 ("POPIA").
- 1.2 We are committed to:
 - 1.2.1 Keeping information securely in the right hands, and
 - 1.2.2 Retention of good quality information.
- 1.3 We further aim to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

2 CLIENT INFORMATION

- 2.1 All personal information from our clients that we obtain and process is collected mainly to ensure compliance with legislation as well as to provide our clients with the services that we offer, to help us improve our offerings to our clients and in order to enable us to comply with all statutory requirements in rendering our services. We collect information about individuals, users and professional's in a variety of ways: including but not limited to: direct from the individuals (for example, when ordering a product, registering an account, using a product, or signing up for a newsletter), from your employer, publicly available information, and through cookies, and/or similar technology. We use the information primarily to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you. We don't share any of the information you provide with others, unless we say so in this Privacy Statement, or when we believe in good faith that the law requires it.
- 2.2 The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of rendering services to our clients.
- 2.3 The information we require we collect directly from our client. Where possible, we will inform our client what information they are required to provide to us and what information is optional.
- 2.4 With our client's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to render our services to our client.

2.5 User-supplied Information

When you register for our services - directly or via your Employer - we ask you to provide some personal information. For example, your name, address, phone number, email address, if required payment card information, and/or certain additional categories of information resulting from use of our products, websites and services, such as research requests. We keep this information in a contact database for future reference, as needed.

2.6 Marketing

We may use certain information you provide to offer you services that we believe may be of interest to you or for market research purposes. If you don't wish to receive such offers or to be contacted directly, you may opt out (unsubscribe) as described below.

To update your preferences for email communications for our products, services, news updates, bulletins and reports, please contact us via the contact details provided or on our website contact page located at www.aylett.co.za.

2.7 Exercise Caution when posting PI on Public Forums

Where some of our products and/or websites make messenger, chat rooms, forums, message boards, or news groups available to you. Please remember that any information disclosed in these areas is public. You should exercise caution when disclosing personal information in these areas. Don't disclose information in these public forums that might be considered confidential.

2.8 Usage and Web server logs

When you visit our web sites, we may track information about your usage and/or visit, and store that information on in usage or web server logs, which are records of the activities on our products or sites. Our servers automatically capture and save the information electronically. Some examples of the information we may collect include:

- Your unique Internet protocol address;
- The name of your unique Internet service provider;
- The city, state, and country from which you access our website;
- The kind of browser or computer you use;
- The number of links you click within the site;
- The date and time of your visit;
- The web page from which you arrived at our site;
- The pages you viewed on the site;
- Certain searches/queries that you conducted via our product(s) and/or website(s).

The information we collect in usage or web server logs, helps us administer the product and site, analyse its usage, protect the product and/or website and its content from inappropriate use, and improve the user's experience.

2.9 Cookies

In order to offer and provide a customized and personal service through our products and websites, we may use cookies to store and help track information about you.

A cookie is a small text file sent to your device that we use to store limited information about your use of the product or website. We use cookies to provide you with certain functionality (such as to enable access to secure log-in areas and to save you having to re-enter information into product or website forms) and to personalize our product or website content. Without cookies, this functionality would be unavailable.

By using our products and websites you agree that we can place these types of cookies on your device.

3 HOW DOES AYLETT & CO PROTECT THE PERSONAL INFORMATION THAT IT COLLECTS?

We have implemented certain appropriate security measures to help protect your personal information from accidental loss and from unauthorized access, use, or disclosure. We store the information about you in a restricted access server with appropriate monitoring, and we use a variety of technical security measures to secure your data. In addition, we use intrusion detection and virus protection software.

Also, please note that we may store and process your personal information in systems located outside of your home country. However, regardless of where storage and processing may occur, we take appropriate steps to ensure that your information is protected, consistent with the principles set forth under this Statement, and as required under Data Protection/Privacy laws.

4 EMPLOYEE INFORMATION

- 4.1 All personal information of our employees that we obtain and process is collected mainly to ensure compliance with legislation and the successful operation of our business.
- 4.2 The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of our operations.
- 4.3 With our employee's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to comply with legislation.

5 HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION

- 5.1 We will use our clients' and employees' information only for the purposes for which it was collected or agreed to with our clients and employees, for example:
 - 5.1.1 To provide our services to our clients, to carry out the transactions our clients requested and to maintain our relationship;
 - 5.1.2 For audit and record keeping purposes;
 - 5.1.3 In connection with legal proceedings.
- 5.2 We will also use our clients and employee's information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

6 INFORMATION SECURITY

- 6.1 We will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except as follows:
- 6.2 When the data is collected from publicly available domains including but not limited to websites, company directories, company registrars, publicly available government lists, search engines and similar technology.
- 6.3 To agents and/or contractors who may use it on our behalf or in connection with their relationship with us (for example, we may use third parties to help us with promotional campaigns).

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- 6.4 As required by law, in a matter of public safety or policy, as needed in connection with the transfer of our business assets (for example, if we are acquired by another company or if we are liquidated during bankruptcy proceedings), or if we believe in good faith that sharing the data is necessary to protect our rights or property.
- 6.5 We will not disclose any information about your usage to unaffiliated third parties, except as necessary to enhance the product experience, service the legal agreement between us and your employer, service the account, collaboration between Aylett & Co services, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law. We may also use statistics regarding usage for product development and enhancement purposes.
- 6.6 Your access to some of our services and content may be password protected. We recommend that you refrain from disclosing your username(s) and password(s) to anyone. We also recommend that you sign out of your product, account or service at the end of each session. You may also wish to close your product terminal or browser window when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place.
- 6.7 We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We are committed to ensure that all personal information of our clients or their businesses as well as our employees will be kept safe and secure and not be disclosed to any unauthorized third parties.
- 6.8 No employee of the company shall be allowed to disclose any personal information of our clients or our employees to any unauthorised third party. Any breach in this regard may lead to disciplinary action being taken which may include summary dismissal.

7 ACCESS TO INFORMATION

- 7.1 Our clients and employees have the right to request a copy of the personal information that we hold about them or their business. Should you wish to obtain any such information, you can lodge such a request with the company. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 7.2 Any such access request may be subject to a payment of an allowable administration fee.

8 CORRECT INFORMATION

- 8.1 Our clients and former employees have the right to ask us to update, correct or delete their personal information. They may do this by contacting us via the contact details provided or on our website contact page located at www.aylett.co.za.
- 8.2 We will take all reasonable steps to confirm our client's identity before making changes to personal information we may hold about our client.
- 8.3 We would appreciate it if our clients and employees would keep their personal information accurate.

9 KEEPING OF RECORDS

- 9.1 Information and records of a personal nature of our client and our employees shall be stored for a period of 5 years before being destroyed.
- 9.2 Before destroying any information or records, we shall first approach our client or former employee in order to confirm whether they would like us to hand said information or records to them. Should they

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not want to keep any such information or records, we will proceed to destroy the information or destroy the information or records ourselves.

10 SECURITY OF PERSONAL DATA

We will take reasonable precautions to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration and destruction.

11 TRANSFER OF PERSONAL DATA

Subject to this Policy, we may from time-to-time transfer Personal Data within and between various worldwide locations for General Business Purposes, in compliance with country of origin regulations and this Policy.

12 ACCOUNTABILITY

- 12.1 The Company expects its associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company.
- 12.2 The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company's supplier and partner relationships.

13 ENFORCEMENT

The Company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. The Company encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the Principles.

14 PRIVACY STATEMENT CHANGES

If Aylett & Co information practices change in a significant way, we will post the policy changes here. Aylett & Co reserves the right to change this Privacy Statement at any time by posting an updated version here. All previous versions will not be valid.

This Policy has been considered and approved by the Directors and Senior Management of Aylett & Co.