

1. COMPANY / COMPANIES INFORMATION

1.1 Merchant West Holdings (Pty) Ltd, hereafter referred to as the Company / Companies or Merchant West. Including Merchant West Treasury Solutions (Pty) Ltd and Merchant West Investments (Pty Ltd).

2. YOUR PRIVACY

2.1 This Privacy Policy only applies to the handling of Personal Information by the Company / Companies.

2.2 The Company / Companies is committed to protecting the privacy of the user of the website. The Company / Companies values the trust of its subscribers and all others who work with it, and the Company / Companies recognises that maintaining your trust requires transparency and accountability in how the Company / Companies handles your Personal Information. This privacy policy ("Policy") is incorporated into and is subject to the Company / Companies's standard terms and conditions and the general terms relating to the use of the Website.

2.3 In performing the Company / Companies's services in the ordinary course of business, the Company / Companies may collect, use and disclose Personal Information. Anyone from whom the Company / Companies collects such information can expect that it will be appropriately and lawfully protected and that any use of or other dealing with this information is subject to consent, where this is required by law. This is in line with the general privacy practices of the Company / Companies.

2.4 This Policy sets out how the Company / Companies collects, uses, discloses, and safeguards the Personal Information it processes in the course of its business.

3. DEFINITIONS

3.1 In this Policy, in addition to the other terms that have been defined in the body of the Policy, the Company / Companies makes use of the following terms:

3.1.1 "Personal Information" means all information which may be considered to be personal in nature or information about an identifiable natural and / or existing juristic person (where applicable) in terms of the Electronic Communications and Transactions Act 25 of 2002 ("ECTA"), the Consumer Protection Act 68 of 2008 ("CPA") and the Protection of Personal Information Act 4 of 2013 ("POPIA"); and

3.1.2 "User, you, your or yourself" refers to any person who makes use of the Website for any purposes whatsoever, whether or not such use is free of charge or paid for.

3.2 In addition, unless the contrary is specified, terms that are used in the Policy that are specifically defined in POPIA, are given the meanings ascribed to them in POPIA.

4. INFORMATION WE COLLECT

4.1 The Company / Companies may collect Personal Information in conducting its ordinary business operations, including through the use of its Website. In processing such Personal Information, the Company / Companies at all times ensures that (i) it complies with the provisions of POPIA, and (ii) such Personal Information is used for legitimate business purposes.

4.2 We collect most Personal Information directly from you. For example, we will collect your Personal Information from you when you:

4.2.1 do business with us, either as a customer or supplier or a potential customer or supplier;

- 4.2.2 complete our contact form or join our mailing list;
- 4.2.3 make an enquiry via telephone or email;
- 4.2.4 register on our websites;
- 4.2.5 interact with our sites, services, content and advertising;
- 4.2.6 submit your resume or curriculum vitae;
- 4.2.7 request information from the Company / Companies;
- 4.2.8 communicate with us through correspondence, chats, email, over the phone or when you share information with us through other social applications, services or websites;
- 4.2.9 provide your Personal Information to us in person, for example at an meetings to discuss your requirements and our products and services; or
- 4.2.10 apply for a credit application with us.

4.3 The information we may collect is as follows:

4.3.1 Individuals

- 4.3.1.1 Name and surname;
- 4.3.1.2 Identity number;
- 4.3.1.3 Physical address;
- 4.3.1.4 Postal address;
- 4.3.1.5 Mobile, home and work contact numbers;
- 4.3.1.6 Email address;
- 4.3.1.7 Date of birth;
- 4.3.1.8 Employment details;
- 4.3.1.9 Your device ID;
- 4.3.1.10 Device type;
- 4.3.1.11 Geo-location information;
- 4.3.1.12 Computer and connection information;
- 4.3.1.13 Statistics on page views;
- 4.3.1.14 Traffic to and from our sites;
- 4.3.1.15 Advertisement data;
- 4.3.1.16 IP address and standard web log information;
- 4.3.1.17 Details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- 4.3.1.18 Credit information, including any late or outstanding payment you owe to us;
- 4.3.1.19 Your activity on our websites, or services; and/or
- 4.3.1.20 Any additional information relating to you that you provide to us directly through our website.

4.3.2 Juristic Persons/Corporate Entities

- 4.3.2.1 Name;
- 4.3.2.2 Registration number;
- 4.3.2.3 Physical address;
- 4.3.2.4 Postal address;
- 4.3.2.5 Mobile, home and work contact numbers;
- 4.3.2.6 Email address; and
- 4.3.2.7 Value-Added Taxation ("VAT") number.
- 4.3.2.8 Your device ID;
- 4.3.2.9 Device type;
- 4.3.2.10 Geo-location information;
- 4.3.2.11 Computer and connection information;
- 4.3.2.12 Statistics on page views;
- 4.3.2.13 Traffic to and from our sites;
- 4.3.2.14 Advertisement data;

- 4.3.2.15 IP address and standard web log information;
- 4.3.2.16 Details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- 4.3.2.17 Credit information, including any late or outstanding payment you owe to us;
- 4.3.2.18 Your activity on our websites, or services; and/or
- 4.3.2.19 Any additional information relating to you that you provide to us directly through our website.

5. USE AND DISCLOSURE

5.1 The Company / Companies operates its Website, and conducts its business in general, in accordance with South African legislation. The Company / Companies considers it imperative to protect the privacy interests of data subjects.

5.2 In the event that the Company / Companies sends Personal Information outside of South Africa (including if such information is hosted offshore), the Company / Companies will ensure that it takes all reasonable steps to ensure that it complies with all applicable laws in this regard, including POPIA.

5.3 We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

5.4 The purposes for which we usually collect, use and disclose Personal Information depends on the nature of your interaction with us, but may include the following purposes:

- 5.4.1 to enable you to access and use our products and services if you are a customer or other business partner;
 - 5.4.2 to manage our relationship with you, for example if you are a customer or supplier;
 - 5.4.3 to assess your credit application, service and manage any credit account, register any security interests and when necessary, undertake debt recovery action;
 - 5.4.4 to operate, protect, improve and optimise our products, websites, services, business and our users' experience, such as to perform analytics, conduct research and training and for advertising and marketing;
 - 5.4.5 to send you products, services, support and administrative messages, reminders, technical notices, updates, alerts, and information requested by you;
 - 5.4.6 subject to possible limitations and qualifications set out in applicable laws, to send you marketing and promotional messages and other information and offers that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
 - 5.4.7 subject to possible limitations and qualifications set out in applicable laws, to administer contests or other promotional activities or events sponsored or managed by us or our business partners;
 - 5.4.8 to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
 - 5.4.9 to consider your employment application and where applicable, to carry out the employment relationship;
 - 5.4.10 to respond to requests for information and other general inquiries about our products and services;
 - 5.4.11 to innovate our delivery of products and services;
 - 5.4.12 in the event of late payment or bankruptcy, to collect funds due to us;
 - 5.4.13 Where we have a duty or a right to disclose in terms of law or industry codes; and/or
- or

5.4.14 Where we believe it is necessary to protect our rights.

6. DIRECT MARKETING

6.1 We and/or our carefully selected business partners may send you direct marketing communications, information and offers about services and products that we think may interest you. This may take the form of emails, SMS, mail or other forms of communication. You may opt-out of receiving marketing communications from us by contacting our Privacy Officer using the details set out below or by using the opt-out facilities provided in our communications (e.g. an unsubscribe link). Where required by applicable law, we will only send you email or SMS marketing emails with your consent.

7. RETENTION

7.1 All Personal Information retained on the Company / Companies's database, including such information obtained through the use of the Website, is in accordance with the retention provisions set out in the applicable laws and regulations of South Africa, including those set out in POPIA.

8. YOUR RIGHTS

8.1 It is important to note that you have rights in relation to your Personal Information.

8.2 You have the right to contact the Company / Companies at any time to ask the Company / Companies to:

8.2.1 confirm that it holds your Personal Information (at no charge);

8.2.2 provide you access to any records containing your Personal Information or a description of the Personal Information that the Company / Companies hold about you (subject to payment of a prescribed fee); and / or

8.2.3 confirm the identity or categories of third parties who have had, or currently have, access to your Personal Information (also subject to payment of a prescribed fee).

8.3 The Company / Companies's contact information is as set out in section 1.2 of this policy.

8.4 When you make a request regarding your Personal Information, the Company / Companies will take reasonable steps to confirm your identity.

8.5 There may be times when the Company / Companies cannot grant access to your Personal Information, including where granting you access would (i) interfere with the privacy of others, or (ii) result in a breach of confidentiality. The Company / Companies will always provide you with reasons if this is the case.

8.6 If you are of the view that any Personal Information that the Company / Companies holds about you is incorrect in any way, including that it is inaccurate, irrelevant, outdated, incomplete or misleading, you are allowed to ask the Company / Companies to correct it. If you believe that any Personal Information that the Company / Companies holds about you is excessive or has been unlawfully obtained, you can ask the Company / Companies to destroy or delete it. You may do the same if you think that the Company / Companies has retained it for longer than necessary, given the purpose. The Company / Companies will do so unless there are good grounds not to (such as that the Company / Companies is required to hold it for a period prescribed by any applicable legislation).

8.7 It is important, however, to understand that if you withdraw your consent for the Company / Companies to use some of your Personal Information, it may affect the quality and level of service that the Company / Companies can provide to you.

9. SECURITY

9.1 The Company / Companies has adopted a security model to protect your Personal Information that complies with generally accepted information security practices and procedures. As part of the Company / Companies's security systems, the Company / Companies has implemented fire-wall technology, password controls, encryption processes and antivirus software. This is in addition to as the physical security measures adopted by the Company / Companies to ensure that it takes all appropriate, reasonable technical and organisational measures to prevent (i) loss of, damage to, or unauthorised destruction of Personal Information, and (ii) unlawful access to or processing of Personal Information. The Company / Companies has a stringent security policy in place that every officer, employer and supplier of the Company / Companies must adhere to.

9.2 The Company / Companies confirms that it takes all reasonable measures to:

9.2.1 identify all reasonably foreseeable internal and external risks to any Personal Information in its possession or under its control;

9.2.2 establish and maintain appropriate safeguards against any risks that are identified by the Company / Companies;

9.2.3 regularly verify that these safeguards are effectively implemented by or on behalf of the Company / Companies; and

9.2.4 ensure that such safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

10. COOKIES

10.1 The Website uses cookies in a limited way.

10.2 Cookies are small files containing information that a website uses to track a visit by a user. The Company / Companies uses session cookies to better understand how the Website is used by users to improve the performance of the Website for users, particularly the way search pages are delivered. The Company / Companies has installed settings on the Website to ensure that session cookies do not remain on your computer at the end of your visit to the Website, and cannot be used to obtain any personally identifiable details.

11. THIRD-PARTY WEBSITES

11.1 The Website may contain links to third party websites. In the event that you follow a link to any of these websites, it is important to note that these websites have their own terms of use and privacy policies and that the Company / Companies does not accept any responsibility or liability for them. If you (i) are a client of the Company / Companies, or (ii) are a user of the Website, and you have purchased products or services from the Company / Companies, the Company / Companies may use your contact details to send you details of any new similar products or services which the Company / Companies thinks you would be interested in. In doing so, the Company / Companies will at all times comply with any applicable direct marketing laws.

11.2 Any communications that you do receive from the Company / Companies pursuant to clause 11.1 will set out how to opt out of receiving future communications from the Company / Companies, free of charge, if you no longer wish to receive material for any reason whatsoever. The Company / Companies will only send you marketing messages when you tick the relevant boxes at certain times when engaging with the Company / Companies.

11.3 As the Company / Companies is not responsible for any representations, information, warranties and / or content on any website of any third party (including websites linked to this Website), the Company / Companies does not exercise control over third parties' privacy policies and the onus is on the User to refer to the privacy policy of any such third party before providing them with any of your Personal

Information.

12. POLICY UPDATES

12.1 The Company / Companies, in its sole discretion, reserves the right to update, modify or amend this Policy from time to time with or without notice. You therefore agree and undertake to review the Policy whenever you visit the Website. Save as expressly provided to the contrary in this Policy, any amended version of the Policy shall supersede and replace all previous versions thereof.

13. CONTACT INFORMATION

Questions, concerns or complaints related to this Policy or the Company / Companies's treatment of Personal Information should be directed to info@merchantwest.co.za.