

EFTSURE AFRICA PROPRIETARY LIMITED - PRIVACY STATEMENT & DATA PROTECTION POLICY

Eftsure Africa (Pty) Ltd (Registration Number: 2018/515630/07) (“Eftsure Africa” or the “Company”) respects your right of privacy and your right to control your personal data. We are committed to processing personal data fairly and lawfully.

We take appropriate measures to safeguard personal data against access or amendment by unauthorized persons, and to prevent its unlawful loss, damage or destruction.

The Data Protection Policy is supported by procedures and standards that are based on best practice for comparable businesses. These are reviewed from time to time and, where necessary, are improved in an effort to combat ever- changing cyber risks.

You may contact our information officer at legal@eftsure.co.za with queries that you may have relating to your personal data and we will respond to you.

eftsure AP AUTOMATE	DATA PROTECTION POLICY EFTSURE AFRICA ("Eftsure")
	POLICY
	VERSION: 25052026
	(EFFECTIVE DATE: 25052026)

1. PURPOSE

This policy describes the principles governing the processing of personal data by the Company.

2. SCOPE

This policy applies to all personal data processed in the course of the Company's business.

3. GLOSSARY

Unless inconsistent with the context, the words and expressions in the policy (and procedures, standards and guidelines supporting the policy) have the meanings assigned to them in the eftsure Glossary of Terms.

4. EFTSURE AFRICA DATA PROTECTION POLICY

4.1 The Company:

- 4.1.1 processes personal data in compliance with the conditions and principles governing its lawful processing;
- 4.1.2 collects personal data for specific, explicitly defined and lawful purposes and does not further process personal data in a manner that is incompatible with those purposes;
- 4.1.3 only processes personal data that is adequate, relevant and not excessive for the purpose of the processing;
- 4.1.4 processes personal data transparently to the data subject and in a manner that is fair and makes all reasonable efforts not to infringe the privacy of the data subject;
- 4.1.5 does not process personal data unless it is lawfully justified to do so;
- 4.1.6 collects personal data from the Company's Customers or directly from the data subject unless it is permitted by law to collect the information from other sources;
- 4.1.7 takes reasonable appropriate measures to safeguard the integrity and confidentiality of personal data and to prevent its loss or damage, unlawful access and unauthorised destruction;
- 4.1.8 by written contract, binds third parties processing personal data on its behalf, to establish and maintain appropriate security safeguards as well as comply with the principles set out in this policy;
- 4.1.9 provides timely notification to data subject and data protection authorities of a compromise of the data subject's personal data;
- 4.1.10 processes personal data transparently to the data subject and takes reasonably practicable steps to ensure that the information is accurate and kept up to date;
- 4.1.11 permits and assists data subjects to access their personal data and corrects or deletes information that is inaccurate;
- 4.1.12 assists data subjects who object to the processing of their personal data;

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- 4.1.13 retains personal data for the periods required by law, contracts with third parties or reasonably required for business purposes, but not for any longer than is necessary to achieve the purpose for which the personal data was collected and processed;
- 4.1.14 will not use personal data for the purpose of unsolicited electronic communication, nor for automatic decision-making, without the consent of the data subject;
- 4.1.15 only transfers personal data across borders to jurisdictions that effectively uphold the principles and conditions governing the protection of personal data established in the Republic of South Africa, alternatively if the data subject has consented to the transfer.

5. **POLICY RESPONSIBILITY**

- 5.1 The Company has appointed a Data Protection Committee to oversee data protection at the Company.
- 5.2 The Data Protection Committee requires all the Company's employees, agents or invitees to uphold its data protection policy.
- 5.2 The Company has appointed an Information Officer and delegated to the Information Officer the authority to fulfil the duties and responsibilities required in relevant legislation and regulation.

6. **REVIEW AND AUDIT**

- 6.1 The policy (and the procedures and standards supporting the policy) is reviewed by the the Company's Data Protection Committee regularly, and at least once in each year.
- 6.2 Reviews and any revisions of the policy (and the procedures and standards supporting the policy) will be recorded in an Approval and Revision History filed with this policy.
- 6.3 Compliance with this policy (and the procedures and standards supporting the policy) is monitored and subject to audit.