

Privacy Policy

TRADE SHIELD (PTY) LIMITED ("TRADE SHIELD")

Trade Shield (Pty) Limited ("Trade Shield") strives to ensure that your privacy is protected. This Privacy Policy therefore regulates the manner in which we collect, use, process, disclose, transfer, and retain personal information.

We comply with the National Credit Act, 2005 (No.34 of 2005) ("NCA"), the Protection of Personal Information Act, 2013 (No. 4 of 2013) ("PoPIA") and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No.25 of 2002) which govern the rights to having personal information kept private of which these principles are covered in this Privacy Policy.

Use and Disclosure of Personal Information

Trade Shield limits the use and disclosure of personal information to include only what is permitted and prescribed in terms of the NCA, PoPIA, GDPR or any other applicable laws or in instances where consumers have consented to such collection, use and disclosure.

Confidentiality of Personal Information is important to us. Unless we have consent or permission under national laws, we will not sell, rent or lease Personal Information to others. We will not use or share Personal Information in ways unrelated to the circumstances described in this Privacy Policy.

Unless permitted by the laws or with consent, we do not use any of Personal Information concerning the religious, or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information.

Specifically, we use and disclose information in the following circumstances:

- **From credit/business information reports.** Trade Shield provides access to third party reports via its platform.

The following Information is included in such reports:

- Identifying information, such as: business name, business registration number, business address, director/member names, director/member ID numbers, physical and postal addresses, contact numbers;

- **Account History or Payment Profile:** The account history or payment profile is a record of all known accounts with credit or service providers and a history of how those accounts are paid;
 - **Enquiries:** a list of credit or service providers authorized (with consent) or permitted in terms of the NCA to receive a credit report;
 - **Public Records:** Information that is publicly available as permitted by law such as judgments, administration orders, sequestrations, and rehabilitation, liquidation applications, company registration information, tax information;
 - **Default Data:** a default is recorded on a consumer credit profile when you fail to make the payment of money owed. Default data is submitted by the credit or service providers to the credit bureaus; This does not refer to accounts receivable data shared with Trade Shield which is not shared on reports.
- **Direct Marketing.** We will use Personal Information for the direct marketing purpose only if consent was provided to us or it is permitted by the laws.
- One may sign up for our news by clicking the opt-in during the online ordering process by ticking the opt-in box that states,
 - Trade Shield will access, use, process and analyse Personal Information provided, Credit Information, Internet Information and Marketing Data to provide personalized offers of Trade Shield and our trusted partners.
 - In case one no longer wants to receive such communication, one may opt-out of such communications by clicking on unsubscribe or calling our marketing department and asking to be taken off the list.
- **Compliance with laws and regulations.** We may only access, use and/or disclose Personal Information without consent in exceptional circumstances. These include circumstances where such action is necessary to:
- comply with the law or legal process served on us;
 - comply with requests for information from police or government authorities;
 - protect and defend our rights or property (including the enforcement of our agreements);
 - protect the public interest;
 - act in urgent circumstances to protect the personal safety of our employees or members of the public;

- where applicable, with implied consent ; and
 - to the extent permitted or required in terms of the NCA, PoPIA, GDPR and other relevant national legislation.
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- **Market Research.** Participation in market research activities is optional. Should one choose to participate, we may use information provided to improve the experience of our products and services. We may engage third parties to assist us with our market research efforts who may retain non-personal aggregated information. However, all Personal Information provided will only be used for our research purposes.
 - **Recruitment.** When you apply for employment, we use Personal Information for recruitment purposes only.

Retention Of Information

We retain Personal Information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws and consent to such purpose(s) remains valid.

Transfer of Personal Information Outside

Unless prohibited by the law, Trade Shield makes use of cloud storage of data that exists both in South Africa and in Northern Europe. We will only transfer Personal information to jurisdictions that have equal or stronger privacy regulations, such as the European Union.

Rights and Participation

Trade Shield aims to ensure that Personal Information is accurately recorded. To be able to achieve this, we adhere to processes that help ensure and maintain data accuracy. We provide reasonable access to review and correct Personal Information, as detailed in our website.

When gathering Information Trade Shield works with data suppliers to increase their awareness of the importance of providing only Information that is accurate, complete, and up to date. Trade Shield however, cannot alter the information reported by such data suppliers. If you do not agree with the accuracy of information Trade Shield has on file, our data suppliers have procedures that will allow, and where appropriate, the Information to be amended or corrected.

Unless otherwise provided in any laws, you have the right to access, update, correct or object to processing of one's Personal Information. One may contact us:

- **by e-mail:** support@tradeshield.ai
- **by phone:** Trade Shield Contact Centre: +27 10 007 2600

Trade Shield makes reasonable efforts to incorporate the changes in Information that we maintain as soon as practicable.

One has the right to lodge a complaint with the Information Regulator:

- **by e-mail:** infoereg@justice.gov.za;
- **to the following postal address:** SALU Building, 316 Thabo Sehume Street, PRETORIA; or
- **by telephone:** 012 406 4818; or **by Fax:** 086 500 3351.

Online Information

When you visit and use any Products or functions in Trade Shield sites, we may collect the behavioural data and general internet data, including your internet protocol ("IP") address, metadata, location data, date and time you visit:

- A "cookie" is also set on your computer to allow us to recognize you whenever you visit and collect information, like the pages you visit and the preferences you choose. We use the information we collect for statistical purposes and to study how Trade Shield sites is used so that we may improve and enhance your experience on Trade Shield sites. We may provide such information collected to outside vendors located overseas for such purposes. No personal information is stored in cookies. It is possible for you not to accept our cookies while using Trade Shield sites by setting the preference in your web browser. If you do so, you may not be able to apply for credit reports online but you can still visit the pages in Trade Shield sites. If you would like more information about cookies, you can visit http://www.cookiecentral.com/n_cookie_faq.htm. Trade Shield uses two different types of cookies.

One type of cookie is used so that Trade Shield sites "recognize" you each time you return using the same computer, and you do not have to re-enter all your personal information on each visit. You can set your web browser to refuse to accept this cookie, or delete this type of cookie from your hard drive, and still access our products and services, as long as you re-enter information each time you visit. The second type of cookie is needed so that we can process each step of your transactions with us. If you refuse to accept this type of

cookie, you will not be able to access our products and services. Most web browsers automatically delete this type of cookie when you terminate your session;

- We may use domestic or overseas third-party advertising companies to serve ads on Trade Shield sites or on other sites which we use for advertising. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness; and they are not authorized to use the information we share with them for any other purpose. Any information that these third parties collect via cookies and action tags is completely anonymous.
- We may use Google Analytics or other similar analytical tools to obtain information collected in order to display, optimize and personalize advertisements and customer experience on our web properties that are designed to bring visitors to Trade Shield sites, to determine which advertisements you may find useful, and to personalize your experience on Trade Shield sites and web properties. We may also use this information to segment, enhance or modify our advertisements and to personalize your experience; and/or
- **Anonymous Data:** In order to enhance the usefulness of Trade Shield sites and our Services, Trade Shield will collect data about our customers' use of Trade Shield sites, in a manner that does not include any Personal Information. While you browse the Trade Shield sites, we note which pages of Trade Shield sites you visit and note the IP address of your computer (as all web sites do automatically), but we do not link that address information to your personal information, other than for purposes of authentication and protection of your personal information when you access the Site electronically. The general information we gather enables us to serve our customers better by continually enhancing Trade Shield sites based on up-to-date use patterns. We are provided anonymous information collected from other web sites on which we display advertisements that enables us to understand how visitors to Trade Shield sites, who were exposed to ads we have placed on those other web sites, interact with Trade Shield sites. We may use this information to enhance or modify our campaigns that are designed to bring web visitors to Trade Shield sites. You may opt-out of this anonymous data collection and sharing activity by visiting the Google Analytics Privacy Overview web page and following the procedures noted under the Browser Opt-Out and Privacy Center information sections (search for these sites through www.google.com).
- **Behavioral Data:** Behavioral data is the information which Trade Shield will use to serve you with personalized offers of Trade Shield and our trusted partners. This data includes your interaction with our Products and Services in Trade Shield sites, including but not limited to information searched, transaction conducted, purchase history etc. The information Trade Shield gathers is for the purpose of enhancing the relevancy of the personalized offers. All these

data will be kept in our secure server and no Personal Information will be transferred to any third parties.

Marketing Data: The information we collect for our Digital Marketing business is segregated from our Credit Information. Marketing Data may include information on businesses and related persons as well as non-personal aggregated information and advertising program performance data. Marketing Data includes information about businesses, such as size, industry, location and quality.

Security of Your Information

Trade Shield takes security and the protection of Personal Information and Consumer Credit Information seriously. We maintain physical, technical and organizational safeguards to protect any data that we collect. We have adopted procedures to secure storage of Personal Information and are committed to working with our data suppliers to protect the security of Personal Information during any transfer to or from us. Furthermore, your Personal Information is only accessible to those Trade Shield employee members, agents or contractors for business purposes and on a strictly need to know basis.

On Trade Shield sites, we take precautions to secure Personal Information. If, and when we ask for Personal Information, we do so through a Web page that uses the industry standard secure transport protocols. These protocols provide security for information by encrypting it as it travels from the information provider to our servers.

To protect privacy and security, we will also take reasonable steps to verify identity before granting access to or making alterations to data we maintain.

Compliance and Enforcement Of this Privacy Policy

Our compliance with this Privacy Policy will be monitored on a quarterly basis. Trade Shield reserves the right to modify this Privacy Policy. The Privacy Policy posted at any time via Trade Shield sites shall be deemed to be the Privacy Policy then in effect.

Any queries on our Privacy Policy or the manner in which Personal Information is treated, we encourage any such queries or concerns to be directed to us at support@tradeshield.ai. We will ensure you are contacted without delay in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Privacy Policy.