



TRADE SHIELD

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Building 32, 2nd Floor, The Woodlands,
Office Park, 20 Woodlands Dr,
Woodmead, Sandton, 2191

Privacy Policy

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 given their consent 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 law or with consent, we do not use any personal information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, 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, along with a history of how those accounts are paid. This does not include information provided to Trade Shield from accounts receivable files shared by Trade Shield clients, which are not shared.
- 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, rehabilitation, liquidation applications, company registration information, and tax information.
- Default Data: A default is recorded on a consumer credit profile when you fail to make the payment of money owed. Credit or service providers submit default data to the credit bureaus. This does not refer to accounts receivable data shared with Trade Shield, which is not included on reports.
- Direct Marketing. We will only use Personal Information for direct marketing purposes if we have obtained consent or if the law permits it.
- 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.
- If you no longer wish to receive such communications, you may opt out by clicking 'unsubscribe' or by contacting our marketing department and requesting to be removed from 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.
- Market Research. Participation in market research activities is optional. Should you choose to participate, we may use the information provided to enhance 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

- Unless prohibited by law, Trade Shield utilizes cloud storage for data that exists in both South Africa and 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 achieve this, we adhere to processes that help ensure and maintain data accuracy and integrity. We provide reasonable access to review and correct Personal Information, as detailed on 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 disagree 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 the processing of your Personal Information, and if you have concerns or wish to dispute any credit-related information that Trade Shield holds or reports, please get in touch with us directly.

You may contact us:

- By e-mail: support@tradeshield.ai
- By phone: Trade Shield Contact Centre: +27 10 753 1630

Personal Information Queries

- Trade Shield makes reasonable efforts to incorporate the changes in the Information that we maintain as soon as practicable. If you feel that you have not received adequate support, then you have the right to complain to the Information Regulator:
- By e-mail: infoereg@justice.gov.za
- To the following postal address: SALU Building, 316 Thabo Sehume Street, PRETORIA
- By telephone: 012 406 4818; or by Fax: 086 500 3351

Credit-Related Enquiries

- If you are not satisfied with the outcome of your dispute, or if you wish to escalate the matter further, you may contact the National Credit Regulator:
- Email: complaints@ncr.org.za
- Website: www.ncr.org.za
- Call Centre: 0860 627 627

Online Information

- When you visit and use any Products or functions on Trade Shield sites, we may collect behavioral data and general internet data, including your internet protocol ("IP") address, metadata, location data, and the date and time of your 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 are 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. You can opt out of accepting our cookies while using Trade Shield sites by adjusting your web browser's preferences. If you do so, you may have limited access to 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 that 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 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 helpful, 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:** 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 websites do automatically). Still, 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 collect anonymous information from other websites on which we display advertisements, which enables us to understand how visitors to Trade Shield sites, who were exposed to ads we have placed on those other websites, 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 that Trade Shield will use to serve you with personalized offers from Trade Shield and our trusted partners. This data includes your interactions with our Products and services on Trade Shield sites, including, but not limited to, information searched, transactions conducted, and purchase history. The information Trade Shield gathers is used to enhance the relevance of personalized offers. All this 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 companies 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 implemented procedures to ensure the storage of Personal Information. We 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 protect your personal information. If and when we request Personal Information, we do so through a Web page that uses 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

- Our compliance with this Privacy Policy will be monitored quarterly. 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 in effect.
- If you have any questions regarding our Privacy Policy or the handling of Personal Information, we encourage you to contact 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.