

AGERA GROUP (PTY) LTD AND SUBSIDIARIES

PRIVACY POLICY

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1. INTRODUCTION

The Agera Group and its Subsidiaries respects the right to privacy and confidentiality of our potential and existing clients' personal information.

The Protection of Personal Information Act describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. This includes data such as names, contact details and identity numbers.

This Policy explains how we obtain, use, and disclose our clients' personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA") and the Electronic Communications and Transaction Act ("ECTA").

At the Agera Group, we are committed to protecting our clients' privacy and to ensure that their personal information is collected and used properly, lawfully, and transparently.

The Agera Group reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on our website(s).

2. OBJECTIVE

The objective of this Policy is to ensure compliance with the Protection of Personal Information Act and the Electronic Communications and Transaction Act by:

- Setting out our strategy to uphold the rights to privacy and confidentiality of our clients' personal information.
- Notifying data subjects how we will handle personal information that we obtain.

3. INFORMATION WE COLLECT

The Agera Group and its Subsidiaries collects personal information in various instances, including when:

- Data subjects contact the Agera Group and/or its Subsidiaries or request information or services;
- The Agera Group and/or its Subsidiaries provides services to data subjects;
- Persons apply for employment at the Agera Group and/or with any of its Subsidiaries;



- Persons use the Agera Group and/or its Subsidiaries websites or engage with the Agera Group and/or its Subsidiaries through social media;
- The Agera Group and/or its Subsidiaries collect information directly from a data subject or from third parties (such as regulators, government authorities and registries), or
- Personal and proprietary client information is submitted for business purposes.

The interaction with the Agera Group and/or its Subsidiaries on the Agera Group and/or its Subsidiaries websites will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with the Company via any one of the Agera Group and/or its Subsidiaries media platforms. This information includes, but is not limited to, the person's name, contact details and information regarding the matter with which they need assistance.

In the course of engaging with clients, the Agera Group and/or its Subsidiaries will naturally be exposed to and collect personal and proprietary information which includes the data subject's name, ID/Passport number, addresses, contact details, and financial information as well as other necessary information.

As part of its recruitment processes, the Agera Group and/or its Subsidiaries collects information from graduates and employment applicants. This information includes educational information as well as employment history.

By enquiring regarding employment opportunities at the Agera Group and/or its Subsidiaries or applying for employment, applicants are deemed to provide their consent to the Agera Group and/or its Subsidiaries to process their personal information for recruitment purposes, which may include screening as well as background and reference checks.

4. PROCESSING OF PERSONAL INFORMATION

The Agera Group and/or its Subsidiaries may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent, or
- if the processing is allowed by law.

The purposes for which the Agera Group and/or its Subsidiaries processes personal information include, but are not limited to:



- marketing and promotion of services;
- providing and improving services to clients;
- improving users' experience when using the Agera Group and/or its Subsidiaries websites;
- enabling the Agera Group and/or its Subsidiaries internal operations;
- supplier onboarding, or,
- client credit applications and information.

5. INFORMATION SECURITY

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 will, on an on-going basis, continue to review our security controls and related processes to ensure that our client's personal information remains secure.

Our security procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information, and;
- Investigating and reacting to security incidents.

6. DISCLOSURE OF INFORMATION

We may disclose your information:

- where we have a duty or a right to disclose in terms of law, industry codes or a Court Order; or,
- where we believe it is necessary to protect our rights.

The third parties to whom we disclose personal information include, but are not limited to:



- third party service providers to the Agera Group and/or its Subsidiaries or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals, and law enforcement agencies.

7. TRANSFER OF PERSONAL INFORMATION

Personal information collected by the Agera Group and/or its Subsidiaries may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or at the same level as the law in the data subject's country. However, the Agera Group and/or its Subsidiaries will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

8. RETENTION OF PERSONAL INFORMATION

The Agera Group and/or its Subsidiaries retains personal information for as long as may be reasonably necessary in accordance with applicable laws.

9. COOKIES

The Agera Group and/or its Subsidiaries websites makes use of cookies.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

10. DIRECT MARKETING

The Agera Group and/or its Subsidiaries may send marketing and promotional communications and material to persons. Recipients may opt-out from receiving such communications by contacting the Agera Group and/or its Subsidiaries at the details provided below.

11. CLIENT'S RIGHTS

11.1. ACCESS TO INFORMATION

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/address as provided on our website, complete the prescribe form, and specify what information you require. We will need a copy of your ID/Passport document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

11.2. CORRECTION OF YOUR INFORMATION

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID/Passport document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

11.3. RIGHT TO OBJECT

In terms of Section 11(3) of the Protection of Personal Information Act you have the right to object to our processing of your personal information.

You may object by sending a request in writing to info@ageragroup.co.za.

11.4. RIGHT TO COMPLAIN

You have the right to lodge a complaint with the Information Regulator should you feel that your personal data was not handled in a responsible manner.

The complaint can be sent to the Information Regulator at:

JD House,	P.O Box 31533,
27 Stiemens Street,	Braamfontein,
Braamfontein,	Johannesburg,
Johannesburg,	2017
2001	

Or complaints.IR@justice.gov.za

12. HOW TO CONTACT US

If you have any queries about this Policy, need further information about our privacy practices, wish to withdraw consent, exercise preferences or access/correct your personal information, please contact us at the numbers/addresses listed on our website(s).



MR. B M SILBERMANN
DIRECTOR