



PRIVACY AND PROTECTION OF PERSONAL INFORMATION POLICY

Last Updated: 30 August 2021

1. Introduction

1.1 Bateleur Software Proprietary Limited (Registration Number: 1996/016276/07) respects your right to privacy and your right to control your personal information. We are committed to protecting your privacy, to processing your personal information fairly and lawfully and to complying with applicable privacy and protection of personal information laws. We encourage you to read this Privacy and Protection of Personal Information Policy.

1.2 We take appropriate measures to safeguard personal information against access or alteration by unauthorised persons and to prevent its unlawful loss, damage or destruction.

1.3 This policy is supported by procedures and standards that are based on best practices. These are reviewed regularly and, where necessary, are improved to combat changing risks.

2. Purpose

This policy tells you about our collection and use of your data and describes the principles governing our processing of personal information.

3. Scope

The terms of this policy apply to all personal information processed in the course of Bateleur's business (including your use of our Web site), unless different terms are specified in a form or contract provided to you by Bateleur either online or offline.

4. Protection of Personal Information

Bateleur:

4.1 is accountable for and processes personal information in compliance with the conditions and principles governing its lawful processing;

4.2 collects personal information for specific, explicitly defined and lawful purposes and does not further process personal information in a manner that is incompatible with those purposes;

4.3 only processes personal information that is adequate, relevant and not excessive for the purpose of the processing;

4.4 processes personal information transparently to the data subject and in a manner that is fair and does not infringe the privacy of the data subject;

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- 4.5 does not process personal information unless it is lawfully justified in doing so. Where it relies on the justification of consent, the consent granted by the data subject will be indicated by a clear affirmative action expressing specific consent, freely given, providing an unambiguous indication of the data subject's wishes;
- 4.6 collects personal information directly from the data subject, unless it is permitted by law to collect the information from other sources;
- 4.7 takes appropriate measures to safeguard the integrity and confidentiality of personal information and to prevent its loss or damage, unlawful access and unauthorised destruction;
- 4.8 by written contract, binds third parties processing personal information on its behalf to establish and maintain appropriate security safeguards, as well as to comply with the principles set out in this policy;
- 4.9 provides timely notification to data subject and data protection authorities of a compromise of the data subject's personal information;
- 4.10 processes personal information transparently to the data subject and takes reasonably practicable steps to ensure that the information is accurate and kept up to date;
- 4.11 permits and assists data subjects to access their personal information and corrects or deletes information that is inaccurate;
- 4.12 assists data subjects who object to the processing of their personal information;
- 4.13 retains personal information for the periods required by law, contracts with third parties or as is reasonably required for business purposes, but not for any longer than is necessary to achieve the purposes for which the personal information was collected and processed;
- 4.14 will not use personal information for the purpose of unsolicited direct marketing, nor for automatic decision-making, without the consent of the data subject; and
- 4.15 only transfers personal information across borders to jurisdictions that effectively uphold the principles and conditions governing the protection of personal information established in South Africa, unless the data subject has consented to the transfer.

5. Sharing of Your Personal Information

- 5.1 Except as disclosed in this policy, we do not share your personal information with any outside parties.

5.2 We may share your personal information with our principals, licensors and service providers who perform services to you in their own right or on our behalf. Those companies or persons will be

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permitted to obtain only the personal information they need to provide their services. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

5.3 Information about our users, including personal information, may be disclosed as part of any merger, acquisition, or sale of the company and/or its assets, as well as in the unlikely event of insolvency, bankruptcy, or receivership, in which case personal information would be transferred as one of the business assets of the company.

5.4 We reserve the right to disclose your personal information, without notice, if required to do so by law, or in the good-faith belief that such action is reasonably necessary to comply with legal process, respond to claims, or protect the rights, property or safety of our company, employees, users or the public.

6. Security of Your Personal Information

Whilst we cannot guarantee the absolute security of your personal information, we take all commercially reasonable steps and measures to keep it secure and protect it from loss, misuse, unauthorised access or disclosure by following generally accepted security policies and rules.

7. Use of Cookies and Other Tracking Technologies

7.1 Bateleur may use so-called cookies on our Web site to personalise your online experience. A cookie is a small text file that is placed on your hard drive. Cookies contain information, potentially including personal information, that can later be read by a Web server in the domain that issued the cookie to you. The information that cookies collect may include the date and time of your visit, information which you provided when subscribing to a communication or signing up for a service, and your navigational history.

7.2 In addition to cookies, we may use other technologies, including single-pixel images in promotional e-mail messages or newsletters. These tiny electronic images assist us in determining how many users have opened messages or newsletters. We do not use these images to collect personal information of any kind.

8. E- Mail Monitoring

In order to check for viruses and the presence of inappropriate content, we reserve the right to

intercept, monitor and inspect all material and information transmitted over our e-mail system.

9. Children

We do not intend to offer services to or solicit or collect personal information from anyone under the age of 18. If you are under 18, you should not use our services or provide us with your personal information.

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10. Applicable Law and Jurisdiction

This policy is governed by and will be interpreted according to the laws of the Republic of South Africa, and all disputes, claims and other matters in connection with this policy will be determined in accordance with such laws.

11. Changes to this Policy

We reserve the right to change the terms of this policy at any time. When we make changes, we will revise the "Last Updated" date at the top of the policy. If there are material changes to this statement or in how we will use your personal information, we will notify you by prominently posting a notice of such changes here or on our home page, or by sending you an e-mail.

12. Contact Information

12.1 If you have questions or concerns regarding this policy or if, for some reason, you believe Bateleur has not adhered to these principles, you can contact Bateleur's designated Information Officer using the following contact information:

Information Officer

Paige Rylance

Bateleur Software Proprietary Limited

PO Box 67343

Bryanston

2021

Telephone: +27 11 691 1600

E-Mail: Paige@bateleur.co.za

12.2 You may also write to us to obtain details of the personal information we may hold about you. When you do so, please quote your name and address and a brief description of the information you want a copy of to enable us more readily to locate your data. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you and we may charge a fee to cover the reasonable administration costs involved.