

SPENDA PRIVACY POLICY

Spenda Holdings Pty Ltd, including any subsidiaries or affiliates such as Spenda Payment Solutions and Spenda Scan to Pay, its agent(s), partner(s), or other authorized representative(s) (collectively or individually “Spenda ” or “us” or “we“), is committed to maintaining the accuracy, confidentiality, and security of your personally identifiable information (“Personal Information“) as defined in the Protection of Personal Information Act (“POPIA”).

By using any of our products and services (“Services”) and Websites, you consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy. We recommend that you review this Privacy Policy carefully and retain it for future reference. If you do not agree with these terms, you are requested not to provide any Personal Information to Spenda. You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. Please contact Spenda’s Compliance Officer to withdraw your consent.

Certain Services can only be offered if you provide Personal Information to Spenda. Consequently, if you choose not to provide us with any required Personal Information, we may not be able to offer you certain Services

What information is Collected?

At Spenda, we collect, use and disclose Personal Information to provide you with the Services, to respond to your requests and to communicate with you about our Services (including the Websites), including communications for promotional and marketing purposes.

Websites

When you visit the Spenda website (www.Spenda-sa.com) or the website of any Spenda product or service (collectively, the “Websites”), we may collect Navigational Information about your visit, and/or Personal Information if you have voluntarily provided it to us. You are welcome to browse all our Websites at any time anonymously and privately without revealing any personal information about yourself. We do not allow third parties to collect Personal Information when you access the Websites.

Certain web browsers may provide an option by which you may have the browser inform website or internet services you visit that you do not wish to have Personal Information about your activities tracked

by cookies or other persistent identifiers across time and across third-party Internet websites, online or cloud computing services, online applications, or mobile applications. These are commonly called “do not track” or “DNT” signals. Spenda’s Websites and Services do not respond to DNTs. If you have enabled DNT in your web browser, some parts of our Websites may not display properly, and this may affect your browsing experience.

Phone Calls

Personal Information may be collected on any call to our offices for the purposes of verifying the security of your account, or addressing any customer service inquiry you may have. For purposes of maintaining quality service, calls to any of our customer service lines may also be recorded.

Mobile and Web Applications (“Apps”)

To ensure our Apps function as intended, Personal Information is collected and stored within the Apps you have registered to use. Moreover, non-personally identifiable Navigational Information and other non-personally identifiable usage details, such as how often the App is used, the events that occur within the App, aggregated usage, and performance data is collected to ensure the proper functionality and ongoing performance of the Apps.

Personal Information

Most of the Personal Information we collect comes to us directly from you, and only with your consent. With your consent, we may collect Personal Information from you in person, over the telephone or by corresponding with you via mail, facsimile, our kiosks, the Internet, or from referrals by third parties such as your financial institution. Personal Information may include name, address, e-mail address, occupation, date of birth, business information, other information about yourself or your business, and transaction details.

Navigational Information

This is information about your computer and how you interact with our Websites which may include your IP address, geographical location, web browser, referral source, length of visit, and viewed pages.

Anonymous/Non-Personal Information

At Spenda, we also collect anonymous/non-personal information. Anonymous/non-personal information is information that we do not associate with or trace back to a specific individual or business entity. For example, our web servers collect some anonymous/non-personal information automatically when you visit one of our Websites. Gathered electronically, this information may include the pages you visited, the type of web browser you are using, the level of encryption your browser supports and your Internet Protocol address.

To help us better understand our markets, we may also gather information for analytical purposes by conducting customer surveys, and by extracting demographic information from existing files.

How Your Information is Used

Personal Information

We use your Personal Information to communicate with you and to effectively provide you with the Services. This includes using your information to establish and ensure the proper functioning of online accounts for services through our Websites and Apps. We may also send you information about other products and services in which we believe you may be interested. Additionally, if you are a Spenda merchant client, we will keep you informed about your merchant account activities, send you important notices, and respond to any special needs or enquiries you may have.

Spenda Technologies Merchants

In particular, if you are a Spenda merchant customer, our merchant agreement with you authorizes us to use and disclose the Personal Information that you provide to us to:

- respond to any application for our services;
- provide our services to you, including:
 - provide you transaction details, reporting, and receipts;
 - determining your financial situation by collecting credit and related financial information from our affiliates, strategic partners, credit agencies, other financial institutions and from references provided by you;
 - facilitating the provision of our services by sharing your information with our third-party service providers, credit and debit card issuers, credit and debit card associations, credit agencies and similar parties connected to credit or debit card services;

- investigating potentially fraudulent or questionable activities regarding your merchant account(s) or the use of our services;
- reporting purposes under credit or debit card association rules or regulations and to credit and debit card issuers, financial institutions or other credit or debit card related entities;
- offering you related products and services that might benefit you; and
- provide billing and statement services
- in the course of an actual or potential sale, reorganization, consolidation, merger or amalgamation of our business.

Apps and Website Users

If you are an individual who is using our other services, we may use and disclose Personal Information to provide the services that have been requested, as well as in the following ways:

- to facilitate the provision of our services by sharing the Personal Information with our third-party service providers, merchants you have transacted with, and similar parties connected to the services;
- to offer related products and services that might benefit you;
- improve and/or personalize your experience with our Apps and Websites;
- provide you transaction details, reporting, and receipts;
- to assist with any service inquiries you may have;
- determining your financial situation by collecting credit and related financial information from our affiliates, strategic partners, credit agencies, other financial institutions and from references provided by you; and
- in the course of an actual or potential sale, reorganization, consolidation, merger or amalgamation of our business.

At times, we may anonymize your personal information for statistical and/or analytical purposes to better improve our offerings and develop additional services that may be of benefit to our customers. We only use Personal Information for the purposes that we have disclosed to you. If for any reason your information is required to fulfil a different purpose, we will obtain your consent before we proceed.

Navigational Information

We may use this information to operate and improve the overall experience you have with our Apps and Websites. We may also use Navigational Information in combination with Personal Information to help cater our offerings to your specific needs.

Anonymous/Non-Personal Information

The anonymous/non-personal information gathered from the Apps and our Websites is used primarily for technical, research and analytical purposes like evaluating the various sections of the Websites. This information does not include any personal information and it is only retained until its intended purpose is fulfilled. It is our goal to continuously improve our service offerings to you. Therefore, we use anonymous/non-personal information collected from surveys, from public archives and by extracting information from existing files to better understand our customers' interests, priorities, and satisfaction levels. Anonymous/Non-Personal Information may be used occasionally for security investigations.

When Information May be Disclosed to Outside Parties

We are obliged to keep your Personal Information confidential except when authorized by you, when required by law and/or when permitted by law.

Third-Party Service Providers

At Spenda, we sometimes contract third parties to perform specialized services such as establishing an online gateway for information transfer to our merchants, terminal delivery and repair, and shipping and fulfilment services. Our trusted third-party service providers may at times be responsible for processing and handling some of the information we receive from you.

When we contract with these third parties, they are given only the information necessary to perform those services. Additionally, they are prohibited from storing, analysing or using that information for purposes other than to carry out the service they have been contracted to provide, unless otherwise authorized by you. Furthermore, as part of our agreements, our suppliers and their employees and representatives are required to protect your information in a manner that is consistent with the privacy policies and practices that we have established.

Communications and Marketing

If you have not opted out of receiving promotional emails, newsletters and other materials from Spenda, we may also use your Personal Information to promote and market our Services and to communicate special offers and promotions to you (including special offers and promotions sent on behalf of us through third-party providers). We may disclose your name and contact information (address and/or e-mail address) to these third parties so that they can send you special offers and promotions directly. You may unsubscribe from these emails at any time. Spenda does not share or sell its customer lists to any third parties for marketing or promotional purposes.

To help Spenda make e-mails of more interest to you, and for tracking purposes, Spenda may receive a confirmation when an e-mail is delivered to you and/or you open an e-mail from us, if your computer supports such capabilities.

Cookies

Spenda may, from time to time, use standard technology called “cookies” on its Apps and Websites.

Cookies are small data files that are downloaded onto your computer or mobile device when you visit a particular web site. Spenda uses Cookies to understand your browsing preferences based on previous or current site activity, which enables us to provide improved Services to our customers. We also use cookies to help us compile aggregate Navigational Data to improve the user experience of our Websites. You can disable cookies by turning them off in your browser; however, some areas of our Apps or Websites may not function properly if you do so.

Links to Third-Party Websites

Spenda’s Websites may, from time to time, offer links to third-party websites. These websites may also collect your Personal Information, including information generated through the use of cookies. Spenda is not responsible for how such third-party websites collect, use or disclose your Personal Information.

When Required by Law

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

When Permitted by Law

There are some situations where we are legally permitted to disclose Personal Information such as employing reasonable and legal methods to enforce our rights under our agreements, to collect a delinquent account or investigate suspicion of illegal activities.

Sharing Your Information

Our Employees and Contractors

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees and contractors who have a legitimate business purpose and reason for accessing it. For example, when you call us, our designated employees will access your information to verify who you are and to assist you in fulfilling your requests.

As a condition of their employment or contract agreement, all employees and contractors of Spenda are informed about the importance of privacy and are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behaviour and must follow all applicable laws and regulations.

Unauthorized access to and/or disclosure of customer information by an employee of Spenda is strictly prohibited. All employees and contractors are expected to maintain the confidentiality of customer information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

How We Safeguard Your Information

We use state-of-the-art technologies and maintain current security standards to ensure that your Personal Information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. All safety and security measures are also appropriate to the sensitivity level of your information.

Customer Files

Electronic customer files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets. Access is also restricted.

Online Security

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised.

Our Websites and Apps use Secure Socket Layer (SSL) implementation with a PCI compliant cipher. SSL is the industry standard tool for protecting and maintaining the security of message transmissions over the Internet. When you access your accounts or send information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others.

To safeguard against unauthorized access to your accounts, you may be required to “sign-in” using a user id and a password to certain secured areas of Apps and Websites. Both user id and password are encrypted when sent over the Internet. If you are unable to provide the correct password, you will not be able to access these sections.

When you call our customer service centre you will be required to verify your identity by providing some personally identifying information.

Accessing and Amending Your Information

At Spendax, decisions are made based on the information we have. Therefore, it is important that your Personal Information is accurate and complete. As a customer, you have the right to access, verify and amend the information held in your personal and financial files.

Accessing Your Information

For privacy-related matters, you may access and verify any of your information by contacting Spendax's Compliance Officer, in writing:

By Email:

privacy@Spendax.com

By Mail:

Spendax Holdings

128 City Road, London United Kingdom

Attention: The Compliance Officer

Before Spenda can provide you with any information, correct any inaccuracies, or respond to any complaints we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within 30 days of receiving your request or complaint. If you have questions or concerns regarding this Privacy Policy and/or Spenda's privacy practices, please contact the Compliance Officer. Spenda will investigate all complaints received in writing and will attempt to resolve all complaints to customers' satisfaction.

Amending Your Information

To help us keep your Personal Information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), please contact the Compliance Officer, in writing, so we can make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us. In each case, you will be required to verify your identity by providing some personally identifying information.

Updating this Privacy Policy

Any changes to our privacy policy and information handling practices will be acknowledged in this privacy policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. Spenda will not reduce customers' rights under this Privacy Policy without their express written consent. You may determine when this policy was last updated by referring to the modification date found at the bottom of this privacy policy.

Data Subject Access Request

In the first instance, the UT Group PAIA Manual must be carefully read in order to understand and comply with the regulations enabling the company and its accountable officials to lend proper effect to the access request. All requests for access to information received must be accompanied by the required form – see PAIA Annexure A– Request for Access to a Record of a Private Body.

All enquiries and/or requests for access to information received from any source (i.e. customers, data subjects, persons, interest groups, interested parties, government, NGO's and/ or Regulators) must be directed within 48 hours to the UT Group Information Officer. Further enquiries in terms of this policy as well as requests for information as defined above and in the UT Group PAIA Manual must be directed to privacy@Spenda.co.za

The Information Officer will scrutinize the access request for completeness as well as register receipt thereof. The Information Officer is accountable for granting the requester access to the information sought.

The decision and discretion in granting the requester access to the information sought rests with the UT Information Officer. However, all such decisions must be signed off by the Group Head: Compliance & Legal.

The outcome of the request must be confirmed to the requester by the UT Information Officer in no later than 30 calendar days from the time the request was received by UT. No request may be released to a requester of information without full and proper payment of the necessary fees – see Annexure B of the PAIA Manual for the schedule of applicable fees.

It is a regulatory requirement that the UT Group PAIA Manual be reviewed and updated every six months. The policy may be reviewed on an annual basis and if deemed necessary, the guidelines and procedures referred to above may be amended subject to ratification by the Group Head of Compliance and Legal.

UT Group Information Officer:

Siboniso Bophela

Siboniso@spendaholdings.co.uk

010 222 9920