

PRIVACY POLICY (ID VERIFICATION SYSTEMS)

ID Verification Systems attaches great importance to data protection. The web pages of ID Verification Systems' website can be used without providing any personal information. *However*, if a third party wishes to make use of services offered by our company *via* our website, personal information may have to be processed. If the processing of personal information is required and there is no legal basis for such processing, we will generally obtain the consent of the person concerned.

The processing of personal information, such as the name, address, e-mail address or telephone number of a person concerned, is always carried out in accordance with data privacy legislation applicable to ID Verification Systems such as the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA).

As the responsible party, ID Verification Systems has implemented numerous technical and organisational measures to ensure that the personal information processed *via* this website is protected as completely as possible. Nevertheless, online data transmissions can, in principle, be subject to security gaps, so that absolute protection cannot be guaranteed.

Please read carefully. By access our website, making use of our services and/or submitting information on our site you consent to this Policy and how confidential information is being dealt with.

For ease of reference also refer to our POPI Act Policy on more detail with regards to Personal Information.

SCOPE OF PRIVACY POLICY

ID Verification Systems conducts its business as an online platform for Buyers and/or Sellers (Suppliers and/or Users) in the Republic of South Africa. ID Verification Systems is a responsible party in respect of third party's (your) personal -, confidential - and/or special information.

ID Verification Systems is committed to protecting and respecting any third parties' personal-, confidential and/or special information.

An Information Officer was appointed for overseeing the implementation of this Privacy Policy, whose details can be obtained .

This Policy should be read together with any agreement you may have in place with ID Verification Systems.

1. DEFINITIONS

- 1.1. **"Agreement"** means any written agreement between ID Verification Systems and a Third Party;
- 1.2. **"Applicable Laws"** means all laws, regulations that ID Verification Systems or a third party is required to comply with;
- 1.3. **"Client"** means any prospective, new or existing client of ID Verification Systems and its subsidiaries;
- 1.4. **"Data Subject/s"** for the purpose of this document include all living individuals and juristic persons about whom ID Verification Systems holds Personal Information (Suppliers and/or Users);
- 1.5. **"Electronic Correspondence"** means content sent or received electronically, including email, faxes, incoming voice mail messages, internal instant messages, text messages and voice notes;
- 1.6. **"Employee/s"** means any person who works for or provides services to or on behalf of ID Verification Systems and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of ID Verification Systems. This includes directors, all permanent, temporary and part-time Employees as well as consultants, independent consultants, agency workers and contract workers;
- 1.7. **"ID Verification Systems"** means ID Verification Systems, a close corporation registered in terms of the laws of the Republic of South Africa with registration number: **2006/169367/23** and/or any of its subsidiaries;
- 1.8. **"Image(s)", "Photograph(s)" and "video imageries"** refer to any kind of image capture, still or moving, obtained by any photographic device including still image cameras, video cameras, webcams and photographic enabled mobile telephones, and any other type of image capture device not specified here, whether digital or not, using technology existent from time to time. The processing (including storage) of such images includes film negative, film positive, photographic paper, digital media, magnetic tape and any other kind of storage method able to be used for the storage of images, still or moving, available now or in the future;
- 1.9. **"Information Officer and/or IO"** means the Information Officer appointed as such by ID Verification Systems in terms of the POPIA and who will have the ultimate responsibility to ID Verification Systems that ID Verification Systems complies with the provisions of POPIA;
- 1.10. **"PAIA"** means the Promotion of Access to Information Act, 2000;

- 1.11. **"Personal Information"** means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, recruitment details, financial history and the like. It also includes opinions about individuals as well as facts and also applies to corporate contacts;
- 1.12. **"POPIA"** mean the Protection of Personal Information Act, 2013, including any regulations and/or code of conduct made under that Act;
- 1.13. **"Processing of information"** is any activity that involves use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
- 1.13.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.13.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.13.3. merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information;
- 1.14. **"Record"** means any recorded information:
- 1.14.1. regardless of form or medium, including any of the following:
 - 1.14.1.1. writing on any material;
 - 1.14.1.2. information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or any other device, and any material subsequently derived from information so produced, recorded or stored;
 - 1.14.1.3. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - 1.14.1.4. book, map, plan, graph or drawing;
 - 1.14.1.5. photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
 - 1.14.2. in the possession or under the control of a Responsible Party;
 - 1.14.3. whether or not it was created by a Responsible Party; and 1.14.4. regardless of when it came into existence;
- 1.15. **"Responsible party/parties"** are the people who or organisations which determine the purposes for which, and the manner in which, any personal information is processed. They have a responsibility to establish practices and policies in line with POPIA. ID Verification Systems is the responsible party of all personal information used in its business.
- 1.16. **"Security Compromise / Date Breach"** Although not defined in the relevant legislation, for purposes of this document a *'Security Compromise and/or Date Breach'* shall include any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised access to or acquisition of or disclosure of personal information transmitted, stored or otherwise processed by ID Verification Systems or any operator acting on behalf of ID Verification Systems;
- 1.17. **"Special Personal Information"** includes personal information concerning the health, sex life or biometric information of a data subject, religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;
- 1.18. **"Policy"** means the External Privacy Policy of ID Verification Systems.

2. **PURPOSE OF THIS POLICY**

- 2.1. This Policy set out how your Personal Information will be utilised by ID Verification Systems and applies to any information, including Personal Information and Special Personal Information, which you give to ID Verification Systems or which ID Verification Systems may collect from Third Parties.
- 2.2. It is important that you read this Policy carefully before submitting any Personal Information to ID Verification Systems.
- 2.3. By submitting any Personal Information to ID Verification Systems you provide consent to the Processing of your Personal Information as set out in this Policy.

- 2.4. We do not collect any information about children on purpose, unless parental consent is obtained.
- 2.5. The provisions of this Policy are subject to mandatory, unalterable provisions of Applicable Laws.
- 2.6. Please do not submit any Personal Information to ID Verification Systems if you do not agree to any of the provisions of this Policy. If you do not consent to the provisions of this Policy, or parts of the Policy, ID Verification Systems may not be able to provide its products and/or services to you.

3. AMENDMENT OF THIS POLICY

- 3.1. We may amend this Policy, at any given time.
- 3.2. Any such amendment will come into effect and become part of any Agreement you have with ID Verification Systems when notice is given to you of the change by publication on ID Verification Systems' website. It is your responsibility to check the website often.

4. PRIVACY AND INDEMNITY

- 4.1. ID Verification Systems takes your privacy and the protection of your Personal Information seriously and will only use your Personal Information in accordance with this Policy and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your Personal Information yourself (for example, by ID Verification Systems ensuring that all passwords and access codes are kept secure).
- 4.2. We have implemented reasonable technical and operational measures to keep your Personal Information secure.
- 4.3. You hereby indemnify and hold ID Verification Systems harmless from any loss, damages or injury that you may incur as a result of any Security Compromise and Data Breach of your Personal Information to unauthorised persons or resulting from your acts or omissions during the provision of incorrect or incomplete Personal Information to ID Verification Systems.

5. INFORMATION WHICH ID VERIFICATION SYSTEMS MAY COLLECT ABOUT YOU

- 5.1. We may collect the following information about you:
 - 5.1.1. Personal Information and Special Personal Information;
 - 5.1.2. Records of correspondence or enquiries from you or anyone acting on your behalf;
 - 5.1.3. details of transactions you carry out with us;
 - 5.1.4. details of contracts or sales you enter into with us and/or our third parties and/or third parties trading on our platform / systems;
 - 5.1.5. ID Verification Systems sensitive or special categories of Personal Information, including biometric information, such as Images, fingerprints and voiceprints.
 - 5.1.6. any other Records as determined by the firm from time to time.
- 5.2. Where you provide ID Verification Systems with the Personal Information of Third Parties you should take steps to inform the Third Party that you need to disclose their details to us, identifying us. ID Verification Systems will process their Personal Information in accordance with this Policy.

6. HOW ID VERIFICATION SYSTEMS COLLECTS INFORMATION

- 6.1. You may provide Personal Information to ID Verification Systems either directly or indirectly.
- 6.2. We may also collect your Personal Information from your appointed agent, any regulator, or other Third Party that may hold such information.

7. USE OF INFORMATION COLLECTED

- 7.1. We may use, transfer and disclose your Personal Information for the purposes of:
 - 7.1.1. providing you with the services, products or offerings you have requested from either us and/or third party service providers, and notifying you about important changes to these services, products or offerings;
 - 7.1.2. managing your account or relationship and complying with your requests;
 - 7.1.3. assessing and dealing with complaints and requests;

- 7.1.4. operational, marketing, auditing, legal and record keeping requirements;
 - 7.1.5. verifying your identity or the identity of your beneficial owner;
 - 7.1.6. ID Verification Systems may need to transfer your information to service providers in countries outside South Africa, in which case it will fully comply with applicable South African data protection legislation comprising POPIA and related legislation.
 - 7.1.7. conducting market research and providing you with information about ID Verification Systems' products or services from time to time via email, telephone or other means;
 - 7.1.8. where you have unsubscribed from certain direct marketing communications, ID Verification Systems ensuring that ID Verification Systems does not send such direct marketing to you again;
 - 7.1.9. disclosing your Personal Information to Third Parties for reasons set out in this Policy or where it is not unlawful to do so;
 - 7.1.10. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from ID Verification Systems or any of its Employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications, if any, between you and ID Verification Systems;
 - 7.1.11. improving or evaluating the effectiveness of ID Verification Systems' business or products, services or offerings; and
 - 7.1.12. prevention and control of any disease.
- 7.2. Once you subscribe to receive communications from ID Verification Systems, ID Verification Systems may from time to time (and at any time) contact you about services, products and offerings available from ID Verification Systems or specific subsidiaries which ID Verification Systems believes may be of interest to you, by email, phone, text or other means. You can unsubscribe from receiving such communications.

8. **DISCLOSURE OF YOUR INFORMATION**

- 8.1. Your Personal Information may be shared within ID Verification Systems and with selected Third Parties who process the information on ID Verification Systems' behalf.
- 8.2. We may also disclose your Personal Information to Third Parties in the following circumstances:
- 8.2.1. to the ID Verification Systems Group or other Third Parties to
 - 8.2.1.1. assess and monitor any of your applications for ID Verification Systems' products or services;
 - 8.2.1.2. determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications, subject to the direct marketing provisions of POPIA;
 - 8.2.1.3. have a better understanding of your circumstances and needs to provide and improve ID Verification Systems' products and services;
 - 8.2.2. to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
 - 8.2.3. to any regulator or supervisory authority, including those in foreign jurisdictions, if ID Verification Systems is required to do so in terms of Applicable Laws;
 - 8.2.4. to a prospective buyer or seller of any of ID Verification Systems' businesses or assets;
 - 8.2.5. to any person if ID Verification Systems is under a duty to disclose or share your Personal Information in order to comply with any Applicable Laws, or to protect the rights, property or safety of ID Verification Systems, other Clients or other third parties.
- 8.3. We may transfer your information to another of ID Verification Systems' entities, an agent, sub-contractor or Third Party who carries on business in another country, including one which may not have data privacy laws similar to those of the South Africa.
- 8.4. If you do not wish ID Verification Systems to disclose this information to Third Parties, please contact ID Verification Systems at the contact details set herein and/or on our website. Any such contact will have to be confirmed, in writing, to ensure that ID Verification Systems complies with your request.

9. **RETENTION OF YOUR INFORMATION**

ID Verification Systems may retain your Personal Information indefinitely, unless you object, in which case ID Verification Systems will only retain it if ID Verification Systems is permitted or required to do so in terms of Applicable Laws. However, as a general rule, ID Verification Systems will retain your information in accordance with retention periods set out in Applicable Laws, unless ID Verification Systems deems it necessary to retain it for longer for a lawful purpose.

OUR CONTACT DETAILS

If you have any comments or questions about this Policy please contact the Information Office at:

Address: Unit 10 D, Highway Gardens Office Park

Edenvale (71 Minauch Road)

E-mail: antoinette@idvsystems.co.za

Telephone number: as per website

Attention: Information Officer