

Netcash (Proprietary) Limited

Privacy Notice to its External and Internal Stakeholders

1. Our Organisation – Netcash (Proprietary) Limited, Registration Nr. 2001/019308/07

1.1 General contact details:

- Postal address: P O Box 5, West Beach, 7449
- Physical address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- E-mail address: legal@netcash.co.za
- Telephone number: 0861338338
- Internet site address: www.netcash.co.za

1.2 Contact details of the Deputy Information Officer:

- Name of Deputy Information Officer: Lisanne Pienaar-De Gouveia
- Role: Head of Risk, Legal and Compliance
- Postal address: P O Box 5, West Beach, 7449
- Physical address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- E-mail address: informationofficer@netcash.co.za or legal@netcash.co.za
- Telephone number: 0215218657
- Internet site address: www.netcash.co.za

1.3 Privacy Notice Version

V1.8 10022026

2. Introduction

This Privacy Notice deals with data protection and the Protection of Personal Information Act No. 4 of 2013 (“POPIA”) which came into effect on the 1st of July 2021. The aim of the POPIA is to protect a person’s Personal Information and privacy. This Privacy Notice is designed to set out what Netcash does with the Personal Information (“PI”) collected and what the rights of data subjects are.

3. Netcash PAIA Manual

The Netcash PAIA Manual is available on our website: <https://netcash.co.za/legal>

Our PAIA Manual answers questions such as:

- What are the definitions of Personal Information (“PI”), data subject, responsible party, and processing?
- What legislation is applicable to Netcash and authorizes the collection of PI?
- What records does Netcash keep and when can we refuse access to the records
- What fees are applicable? (If any)
- What PI does Netcash collect?

- What is the source of the PI?
- What are the purposes that Netcash uses PI for?
- How long is the PI retained?
- What security measures have Netcash implemented?
- How to apply for access to information using a manual form
- How to object to Netcash processing PI using a manual form
- How to request that Netcash delete or correct PI using a manual form

This Privacy Notice is intended to be read in conjunction with the Netcash PAIA Manual. Please refer to the Netcash PAIA Manual at the link above.

4. Statement Regarding Children

Netcash products and services are not designed to appeal to children [under the age of 18 (eighteen) years]. As such, the products and services are not directed at children, nor do we knowingly collect or maintain information from children.

Netcash may collect child PI from its employees, in order to assist employees:

- 4.1. with their medical aid relating to their dependents.
- 4.2 when a child is nominated as a beneficiary of an employee in relation to life cover and/or pension fund or other similar benefits.

5. Newsletter and Marketing

When you subscribe, you consent to receive newsletters published or offered via the Sites, we will ask you for the information necessary to enable us to process your request and to send you information regarding our products and services. You can unsubscribe from the newsletter at any time by clicking on the link at the bottom of the newsletter.

Each marketing email we send will contain instructions on how to unsubscribe in the event that you do not wish to receive future promotional emails from Netcash. Please allow 10 (ten) business days for your unsubscribe request to be processed. If you choose to opt-out of receiving promotional email communications from Netcash, we will still send service messages to you. Service messages are sent to our clients to enable them to use our services correctly and are not direct marketing messages. Any Client can change their service message settings once they are logged into the Netcash website.

6. Third-Party Services and Marketing

If you access and/or use any of the other Netcash Companies' services or our Partner's services from a link on the Sites, a Netcash / Partner co-branded site, or by any other means, any information you reveal in connection with such service is submitted to that other Netcash company and is not subject to this Privacy Notice. You should consult the privacy notice of any other party with respect to its treatment of any information that you may reveal in connection with its service.

7. Job Seekers and Employees

We will use the PI you submitted for the purpose you submitted it and will retain the information submitted for the time required by applicable law or in accordance with our standard practice, whichever is longer.

We will not release information submitted by online job seekers and employees to third parties except to appropriate governmental entities and/or our service providers as necessary in connection with recruiting, employment, corporate governance, acquisitions, and legal or regulatory requirements. We require that our service providers keep your PI confidential as well. In addition, to prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate procedures to safeguard the PI we collect. These include, but are not limited, our Payment Card Industry Data Security Standard and ISO27001:2022 certification.

8. Data Permissions and Consents

We require our clients to confirm, acknowledge, agree, and consent to Netcash collecting, processing, and using the particulars of the client for the purposes of entering into an agreement with Netcash for any of the services offered and provided by Netcash. These will include any transaction concluded under it, or any entry, account or other information held by us (which may include personal information about you, the client's directors, officers, shareholders, members, or other individuals) for the purposes of:

- considering and processing your application for services, preparing agreements, and implementing the services.
- monitoring the operation of and performance of obligations in terms of the agreement entered into by Netcash and you, the client.
- enquiring where appropriate with landlords, regulatory bodies, credit bureaus, card and electronic payment transaction processors, banks, and creditors about the applicant client, as may be applicable.
- mitigating financial and other related risks after risk assessment analysis.
- preventing and detecting fraud and money laundering or any other financial crime.
- tracing, tracking, and training purposes.

We wish to ensure that you, our client, are aware and acknowledge that the information required by Netcash's employees under any agreement entered into by the parties are necessary for the conclusion and implementation of the agreement and that without such information, our agreement cannot be concluded and be executed.

We will retain your personal information for as long as it is necessary to perform our obligations under our agreement or as may be required by law, unless you have given consent that Netcash may retain such information for a longer period.

9. Where and how does Netcash use Artificial Intelligence (AI) in our business?

AI is used in the chat bot on the website, which service is outsourced, and PI is protected by an agreement we have with our service provider that was checked before we implemented the service with them.

In addition, the Marketing Department uses AI tools to assist with communication drafting, research, and the generation of digital assets. No personal information is used in the process.

Netcash also implemented an Artificial Intelligence Acceptable Use Policy to ensure that AI is used ethically in business, with due regard to data privacy.

10. Transferring PI to third parties and overseas

Client PI may be accessed or shared with the following categories of recipients:

- Payment processing service providers, banks, and other persons that assist with the processing of client payment instructions, such as Payment Clearing House Systems Operators
- Cloud-based storage facilities and data centre
- Credit Bureau and similar providers
- Authorities and Regulatory Bodies
- Business Service providers which enable Netcash to provide its services
- Employees who assist clients during onboarding and throughout their relationship with Netcash on client accounts, who may have a business interest, external to that of Netcash.

We store our production data in South Africa and our disaster recovery data (which includes PI) in the European Union (EU), in the Netherlands. The segregated storage of our data is a strategic arrangement, not only to mitigate against loadshedding risk but also to mitigate against an event where both the production and disaster recovery data centres simultaneously fail, hence the decision to secure a data set in a different geographical area to ensure business continuity and availability. We have entered into a binding agreement with a reputable multi-national services provider that hosts both our local and disaster recovery data and that fully understands and complies with the relevant local and international data privacy laws and regulations, which are similar to the POPIA and who applies the necessary safeguards. Details of these safeguards may be obtained by contacting us.

11. How to object to our use of your PI, update it, correct it, or ask for it to be deleted

If you are a data subject you have the right to access PI, object to the use of your PI and request a correction or deletion of your records. Please make use of the manual forms in our PAIA Manual, which can be found here: <https://netcash.co.za/legal-page/>

Please note that we are required to authenticate you (confirm who you are) before we can process your PAIA request. The procedures we follow to authenticate you will vary depending on the sensitivity of your request and our internal security procedures.

12. Business Transfers

In the event that all or a portion of Netcash or any other Netcash company (or the assets of one of those entities), is bought or sold, PI of our clients will be included among the transferred business assets, but such information remains subject to this Privacy Notice or a Privacy Notice substantially similar to this one.

13. Information Security

We are committed to information security and are therefore both PCI DSS and ISO27001:2022 certified to protect your personal information through appropriate technical and organisational security measures to minimise risks associated with data loss, misuse, unauthorised access, disclosure, and alteration. In addition, employees are trained on a regular basis to ensure compliance with POPIA.

We do however not warrant the effectiveness of our technical and organisational security measures to minimise risks associated with data loss, misuse, unauthorised access, and unauthorised disclosure and alteration and shall under no circumstances become liable to you for any damages, losses costs or otherwise in this respect, unless it was a direct result of gross negligence or intentional misconduct on our part.

14. What happens if we have a security breach?

Netcash has a variety of security policies as required by ISO27001:2022 and implements and continually updates its security systems. Please refer to our PAIA Manual for more information about our security. We have developed a procedure we follow if we have a security breach (compromise) as defined in section 22 of the POPIA. Part of this procedure is that we will let you know about it as soon as possible and let you know what steps you can take to protect yourself. We will also notify the Information Regulator and if appropriate the SAPS so that they can take appropriate action. If you become aware of any security breach, then please contact us using our details on page 1 of this Notice.

15. Submission of a complaint to the Information Regulator

We take pride in resolving our client and other stakeholder queries and complaints as quickly as possible and prefer to resolve any issues or concerns directly with our clients and other third parties. If a client or other stakeholder, however, deems it necessary to engage the Information Regulator, who is responsible for the compliance and enforcement of the the PAIA and the POPIA, complaints can be lodged with the Information Regulator, as follows:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

16. Changes to this Privacy Notice

This privacy notice came into effect on 01 July 2021. We may change this Privacy Notice from time to time by posting a new version here, and the new version will become effective from the date set out in the new Privacy Notice.

