

PRIVACY POLICY

1. Introduction

Celbux SA Proprietary Limited (“Celbux”, “we”, “us” or “our”) respects your privacy and takes the protection of personal information very seriously.

The purpose of this Privacy Policy is to describe the way that we (when acting in the capacity of a responsible party) collect, store, use, or otherwise process personal information that you provide us with, how we give effect to your rights in terms of Protection of Personal Information Act 4 of 2013, as amended from time to time, including the Regulations issued in terms of the Act (“POPIA”), and the safeguards we have taken to protect that information.

This Privacy Policy supplements our other privacy-related notices and terms and is not intended to override them.

2. Application of this Privacy Policy

This Privacy Policy applies to you (the data subject) if you are –

- a visitor to a website operated or owned by Celbux, located at any domain or subdomain of celbux.com or celbuxwallet.co.za, as updated from time to time (our “website”); or
- a customer or client who makes use or wishes to make use of any of the services that we provide by –
 - registering for our services via our website (see below); or
 - entering into a separate contract with us for the provision of any of our services in South Africa.

3. Personal information

- For the purposes of this Privacy Policy, personal information relates to information that we process as a result of your contacting us, access to, or use of, our website or our services. Personal information therefore includes –
 - certain information collected on registration (see point 5 below);
 - information that you provide to us voluntarily (see point 5 below); and
 - personal information that you provide to us in terms of any contract entered into with us.
- Common examples

Depending on the nature of our relationship with you or the services that you require, common examples of the types of personal information which we may collect and process include your –

- identifying information – such as your name and an identification number of any kind (in the case of a natural person) or registration number (in the case of a juristic person);

- contact information – such as your phone number or email address or, in the case of a juristic person, the name, phone number or email address of a contact person; and
- address information – such as your physical or postal address.
- For clarity, personal information excludes –
 - information that has been de-identified or made anonymous so that it does not identify a specific person (whether natural or juristic);
 - permanently de-identified or anonymised information that does not relate or cannot be traced back to you specifically; and
 - non-personal statistical information collected and compiled by us.
- Special personal information

We do not collect special personal information about you, e.g. information relating to your health, religion, political beliefs, race or sexual orientation, and ask that you do not send or provide this information to us.

4. Acceptance

- Acceptance required

You must accept all the terms of this Privacy Policy when you submit a query or request to us, register for any of our services via our website (or otherwise), or contact us (whether via email or otherwise). You may not submit a query or request, register for any of our services via our website (or otherwise), or contact us (whether via email or otherwise) if you do not accept this Privacy Policy.

Any reference to “acceptance” or “consent”, includes (without limitation) the ticking of a tick-box, clicking on the “send”, “submit” or the “I agree” button on our website, sending an email to addresses provided on our website, or otherwise directly interacting with us.

By accepting this Privacy Policy, you are considered to have read, understood, accepted, and agreed to be bound by all of its terms.

- Legal capacity

If you are younger than 18 (eighteen) years of age or do not have legal capacity to conclude legally binding contracts, you may not register for any of our services or submit your personal information to us (whether through our website or otherwise).

- Your obligations

You may only send us your own personal information or the personal information of another identifiable natural or juristic person where you have their consent to do so.

On receipt of personal information, we assume that the necessary consent has been obtained and will process the personal information as per your instructions. **By submitting such personal information on behalf of another person/data subject, you indemnify us against any third-party claim, where such third-**

party claim relates to personal information that has been processed without the necessary consent or other available exception allowed by law.

5. Collection

- Query or request submission

You may browse our website without revealing any personal information. However, once you submit a query or request to us via our website, you will no longer be anonymous to us. You will be required to provide us with certain personal information and you consent to us processing that personal information for purposes of responding to your query or request.

The personal information that we request via our website is as follows –

- your name and surname;
- your email address;
- your telephone number;
- your identity number; and
- where applicable, your company name.

We will use this personal information to attempt to resolve your query or address your request and, where applicable, to provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this Privacy Policy.

- Registration

Registration for our services is completely optional. Should you wish to register for our services via our website or to enter into a separate contract with us for the provision of any of our services in South Africa, we will request certain personal information about you in order to comply with our legal obligations and in order for you to take full advantage of our services. To register and create an account with us, you will be required to submit certain KYC information, including (but not limited to) your name and identity number/company name and registration number, email address, and mobile number.

- Other Direct Interactions

You may provide us with your personal information when you correspond with us by phone, email, letter or otherwise. This includes personal information that you provide when you request marketing to be sent to you, enter a competition, promotion, or survey, or give us feedback.

- Publicly available information

We may collect or otherwise process personal information related to you via publicly available information such as through the CIPC.

6. Purpose for collection or processing

We collect and process your personal information for various purposes, including (but not limited to) –

- providing our services (for example, responding to your queries or requests or fulfilling our contractual obligations to you);
- managing, supporting or operating our business, including intra-Celbux group transfers of personal information for business and administrative purposes (like responding to your queries or requests);
- business requirements, such as internal audit, accounting, business planning, joint ventures, or other proposed and actual transactions;
- to update your personal information as and when required;
- where you are a current customer or client of ours, to promote our business, such as, providing you with information related to our latest service and product offerings, competitions and loyalty programmes (unless you elect to opt-out), and
- for legal purposes, such as, complying with the law, regulations or pursuing good governance.

Any failure to provide us with your personal information (where requested) may, depending on the purposes in respect of which we collect or process that information (as set out above), impact the services that we render to you or the contract that we have or are trying to enter into with you. We will notify you if this is the case at the time.

7. Use

Personal information that you submit to us will only be used or processed for the purposes set out in this Privacy Policy or for a purpose that is compatible with the primary purpose.

8. Grounds for processing

Depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you, we may rely on one or more of the following legal bases when we collect or process any personal information that you provide to us –

- where processing is necessary for the conclusion or performance of a contract to which you are a party, for example, if you wish to register for our services via our website or if you have entered into a separate contract with us for the provision of any of our services;
- where processing protects your legitimate interests;
- where processing is necessary for pursuing our legitimate interests (or those of a third party with whom we share your personal information);
- where processing is necessary to comply with a legal obligation on us; and/or
- where you have consented (see point 9 below).

9. Consent to collection or processing

You will be considered to have provided your consent to us in order for us to process your personal information in terms of this Privacy Policy, when you provide us with any personal information as follows –

- when you register for the use of our services and/or create an account via our website;

- on signature by you of a separate contract for any of our services;
- on submission of a query or request to us via our website; and/or
- other direct interaction.

Where we process personal information based on your consent, you have the right to withdraw your consent at any time for future processing subject to the terms and conditions set out in POPIA and/or our contract with you (where applicable). We will advise you of these terms at the time you wish to withdraw your consent.

Please note that we may process your personal information without your knowledge or consent, in compliance with this Privacy Policy, where this is required or permitted by law.

10. Disclosure

We may share your personal information for the purposes set out in this Privacy Policy, as the case may be –

- with our affiliates and subsidiaries for the purposes set out in this Privacy Policy;
- with third party service providers to provide, for example, operational, legal, administrative or IT services on our behalf, including (but not limited to) managing, supporting, promoting/marketing or growing our business, assisting with client support, email delivery, information analytics, and auditing;
- if you are our client's customer and our client requires personal information relating to you from us in order for our client to respond to a query or request that they have received from you;
- with our employees or personnel (or those of our service providers) that require the personal information in order to do their jobs. These include our (or our service providers') responsible management, human resources, accounting, audit, compliance, information technology, or other personnel. Any of our (or our service providers') employees or personnel that handle your personal information will do so under strict confidentiality obligations and in accordance with POPIA or other applicable law;
- where you consent to the sharing of your personal information;
- in connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;
- for other legal reasons, including –
 - in response to a request for information by a competent authority in accordance with, or required by, any applicable law, regulation or legal process;
 - where necessary to satisfy any applicable law, regulation or legal process or to comply with judicial proceedings, court orders or government orders;

- to protect your, our or others' rights, property or safety, or those of our affiliates, subsidiaries or business partners; or
- as otherwise required by POPIA or other applicable law.

Should it become necessary for Celbux to transfer your personal information to any third parties (other than in the case of a disclosure for any legal reason contemplated in the final bullet point above), Celbux will only transfer your information in terms of POPIA and will ensure that these third parties are required, in accordance with applicable law, to implement appropriate security measures in order to provide an adequate level of protection of your personal information.

11. Security

We are committed to protecting your personal information from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of technical and organisational security measures and contractually requiring that third parties to whom we disclose your personal information do the same. We also review and update our security measures in light of current technologies.

- Unauthorised disclosure

Despite taking the appropriate security measures to safeguard your personal information, no data transmission over the internet can be guaranteed to be totally secure. Therefore, we cannot accept any liability whatsoever for unauthorised or unlawful disclosure of your personal information by third parties who are not subject to our control.

- Transfer to another country

Our service platform is hosted on Google Cloud. Our use of Google Cloud means that personal information that you provide to us in accordance with this Privacy Policy is processed on Google's servers and facilities, which may be located in countries or regions outside of South Africa, including the United States of America and/or the European Union. The transfer of any personal information by us to Google Cloud is subject to Google's privacy policy (which privacy policy may be found at <https://policies.google.com/privacy>). **Whilst some foreign countries may have adequate data protection laws, other countries' laws may be less stringent. When you disclose your personal information to us in accordance with this Privacy Policy, you accordingly acknowledge and agree to our use of Google Cloud for the purposes set out in this Privacy Policy.**

12. Retention

- We will only retain your personal information for as long as it is necessary to fulfil the purposes set out in this Privacy Policy, unless a longer retention period of the record is –
 - required by law;
 - required for lawful purposes related to our functions;
 - agreed upon in terms of any contract that you enter into with us; or

- consented to by you, in which case, we will retain personal information in line with your consent.
- During the period of retention, we will continue to abide by our confidentiality and legal obligations in respect of your personal information. In certain circumstances we will anonymise your personal information (so that it is de-identified and can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.
- Copies of any correspondence transmitted by or to you, that may contain your personal information, are stored as archives for record-keeping and back-up purposes only.
- Where we retain your personal information as permitted above, we may do so in physical or electronic form at our discretion.

13. Your rights under POPIA

We will process any requests that you make relating to your rights (“Rights Request”) in accordance with POPIA and on an as soon as reasonably practicable basis. To better protect you and safeguard your personal information, we will take steps to verify your identity before processing any Rights Requests related, among others, to the following:

- Access to personal information

You have the right to obtain certain information from us in respect of your personal information and to access a copy of your personal information from us in a form that is generally understandable on request. There may be a fee associated with this Rights Request which we will advise you of at the time of your Request.
- Rectification

We will try to keep the personal information that we collect about you as accurate, complete and up to date as is necessary for the purposes defined in this Privacy Policy and may from time to time request you to update your personal information. If you find that any of your personal information is incorrect, incomplete or outdated at any stage during your interaction with us, you may contact our Information Officer (details under point 19 below) to have your personal information rectified. We may verify the accuracy of the new information that you provide us with prior to rectifying the personal information we have on record.
- Deletion of personal information

You have the right to request the deletion of your personal information in certain circumstances. We will delete any personal information that you do not wish for us to have or process unless we are legally required or entitled to retain or process such personal information.
- Objection to processing

You may object to the processing of your personal information in certain circumstances. Upon receipt of your objection, we will immediately stop processing

the relevant personal information unless there is a legal ground for us to continue to do so.

- **Restriction of processing**

You may request that we restrict the use or processing of your personal information in certain circumstances. We will restrict the use or processing of the relevant personal information unless there is a legal ground for us to continue to use or process such information.

- **Automated decision making**

You have the right not to be subject to a decision based solely on automated processing (including profiling) which results in legal consequences for you, or similarly affects you to a substantial degree, except in certain circumstances.

Should you wish to exercise any of your rights under POPIA, submit a Rights Request or obtain information related to your rights, please contact our Information Officer (details under point 19 below) for assistance.

14. Limitations

If you are a customer of a client of ours, please submit any Rights Request or query you may have regarding your personal information directly to our client in order for our client to respond to you. Where we do receive a Rights Request or query from you that is for our client to address, we will provide you with the relevant client's contact details to enable you to submit your Rights Request or query to our client.

15. Security Compromises

We will notify the Regulator and you (if your identity is known to us) of any compromises to your personal information in accordance with POPIA.

If you are a customer of a client of ours, we will notify our client immediately where there are reasonable grounds to believe that there has been an unauthorised access to your personal information in accordance with POPIA and it is our client's responsibility to notify the Regulator and any other affected natural or juristic persons of the security compromise.

16. Complaints

We endeavour to process your personal information in accordance with POPIA and applicable industry standards. Should you have any complaints about the manner in which we process your personal information, we encourage you to get in touch with our Information Officer (details under point 19 below) in order for us to resolve the matter promptly.

17. Links to third-party websites

This Privacy Policy applies to Celbux. We therefore cannot accept responsibility for the conduct of third parties linked to our website nor can we give any warranties or make any representations in respect of the privacy policies or practices of any third-party websites. Your use of any third-party website is subject to that third-party's privacy policy or practice and is at your own risk.

18. Updates to this Privacy Policy

We may change the terms of this Privacy Policy at any time by updating this web page. If we do, we will update the 'date and version number' section at the bottom of this Privacy Policy. We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices and any changes to this Privacy Policy. Any new version of this Privacy Policy will apply the moment it is published on our website or incorporated by reference in any communication.

19. Enquiries

We welcome your comments and feedback. If you have any questions or concerns relating to this Privacy Policy, or if you do not understand it or do not agree with it, please contact our Information Officer as follows:

Information Officer	Charl Moller
Email address	informationofficer@celbux.com
Postal address	Ground Floor, Building 7, 48 Oak Avenue, Highveld Technopark, Centurion, 0169, South Africa
Physical address	Ground Floor, Building 7, 48 Oak Avenue, Highveld Technopark, Centurion, 0169, South Africa
Telephone number	+27 65 800 9158