



SHOP2SHOP PRIVACY NOTICE

Introduction:

This is the privacy policy (“**Policy**”) for Shop2Shop Proprietary Limited (Registration No. 2005/034270/07), a private company registered in the Republic of South Africa with its main place of business at 17 New Church Street, Cape Town (“**we**”, “**us**” or “**our**”).

Our information officer's details are:

Name	Patrick Winter
Contact Number	(021) 023 0291
Email Address	info@shop2shop.co.za

We take the privacy of personal information seriously. This Policy sets out how we process information about you when you visit our website/mobile application, contract with us, purchase our products, interact with us, or otherwise use the services we offer (together, our “**Services**”).

By submitting any personal information to us, you provide consent to the processing of your personal information as set out in this Policy. By transmitting personal information to us belonging to a third party, you warrant that you have the requisite authority for us to process that information. You must notify us immediately if any third party consent is withdrawn.

If you do not accept or understand this Policy for any reason you should stop using our Services immediately.

What Personal Information Do We Collect?:

The information that we process depends on the Services, and may include, amongst other things:

- identifying information – such as your name, date of birth, or identity/passport number. We may also collect video footage of you when you are on our business premises;
- contact information – such as your phone number or email address;
- address information – such as your physical or postal address;
- demographic information – such as your gender or marital status.

We may also collect sensitive personal information from time to time, including:

- financial information – such as your bank account details;
- sensitive demographic information – such as your race or ethnicity;
- medical/biometric information – such as your fingerprints (to gain access to our business premises), or information about your physical or mental health;
- criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings; and
- employment information – such as your membership of a trade union

The personally identifiable information that we process is collectively referred to in this Policy as

“personal information”.

How Do We Collect It?:

You may provide personal information to us either directly or indirectly, by completing an application form for any of our Services or requesting information in relation to our Services (whether in writing, through our website/mobile application, or by any other means).

We may also collect your personal information (where we are lawfully entitled to) from your nominated agent, a regulator, or other third party that may transmit such information to us.

You are under no obligation to provide your personal information to us. However, without certain personal information, we may not be able to provide the Services to you.

How Do We Process It?:

We will only process personal information in accordance with data protection legislation, including the Protection of Personal Information Act (No. 4 of 2013) ("**POPI**") and any other applicable data protection legislation and/or regulation applicable to the Services (collectively, the "**Data Protection Laws**").

Why Do We Process It?:

We may process personal information for the following reasons:

- To provide you with any Services (and to notify you about changes to these Services).
- To provide you with information about our Services.
- To carry out your instructions and attend to your requests.
- To manage an account you have with us.
- To facilitate a business relationship we have with you.
- To verify your identity.
- To determine whether you meet the criteria for the use of our Services.
- To conduct an affordability assessment in the event that you apply for credit with us.
- To prevent fraud, money laundering and/or other criminal activities.
- For operational, auditing, legal and record keeping purposes.
- To evaluate and improve our Service offering.
- To vet you as a customer, supplier, service provider, contractor or employee.
- To collect any outstanding debt that may be payable by you to us.

We may, from time to time, use your contact details to send you product news and updates and to market and promote future products and services which we think may interest you and/or to provide you with useful information about our Services. You may, at any time, opt-out of receiving such

communications from us.

In addition to the above, we may also process personal information:

- To the extent that we are required by law. It is our policy to co-operate with relevant authorities in relation to law enforcement inquiries. You authorise us to disclose any information about you to such authorities as we, in our sole discretion, believe necessary or appropriate in connection with the investigation of any illegal or purported legal activity.
- In connection with any legal proceedings.
- In order to establish, exercise or defend our legal rights.
- To protect the rights, property and personal safety of another user and/or any member of the public.

Who Do We Share It With?:

We may share personal information with our affiliates, related entities and service providers (including, but not limited to, our auditors, accountants, lawyers and storage service providers) in order to render the Services, and/or otherwise for our internal administration purposes.

We will not sell your personal information to marketers or unaffiliated third parties without your prior written consent. However, we may share with third parties anonymised and de-identified information that is submitted to us, provided that it will no longer contain personally identifiable information and cannot be linked to you.

Your Obligations:

Where we request information from you, you agree to provide us with honest, accurate and up-to-date information and to maintain and update such information when necessary. It is your responsibility to contact us (via our information officer) if any of your personal information is incorrect, incomplete, misleading, or if you require its transfer or deletion. **You hereby indemnify and hold us harmless from any loss, damages or injury that you may incur as a result of incorrect or incomplete personal information to us.**

Cross Border Processing:

We may process personal information outside the country in which it is collected, but only in jurisdictions where the law imposes conditions for the processing of information which are equivalent to, or more extensive, than those conditions contemplated in the relevant Data Protection Laws, or where otherwise permitted in terms of the relevant Data Protection Laws.

Retention:

We will retain your personal information for as long as we are permitted or required to do so in terms of any applicable laws.

Third Party Links:

Our website and mobile application may have links to or from other websites. We recommend that you always read the privacy and security statements on these websites; **we are not responsible for the security, privacy practices or content of third party websites.**

Data Protection Measures:

We have implemented technological and organisational measures aimed at protecting the confidentiality and integrity of your personal information. We have identified the reasonably foreseeable internal and external risks to your personal information and have established, and will maintain, appropriate safeguards against these risks. We regularly verify that these safeguards are being effectively implemented and we will continually update these safeguards in response to new risks or deficiencies identified.

Breaches:

We will notify you, and the appropriate regulator, immediately where we have grounds to believe that any personal information has been accessed or acquired by any unauthorised person.

Cookies:

We may track and store some information (commonly known as a "**cookie**") when you visit our website and/or mobile application. The cookies we use may include mandatory cookies, preference cookies, statistical cookies, marketing cookies and/or optional cookies. Cookies enable us to recognise you during subsequent visits and make it easier for us to give you a better experience on our website and/or mobile application. Apart from establishing basic connectivity and communications, we may also use this data in aggregate form to develop customised services which are tailored to your individual interests and needs. You may change your device settings to decline cookies. However, this may cause certain features of our website or mobile application to be inaccessible.

Data Subject Rights:

As a data subject, you have certain rights in respect of your personal information, including:

- The right to be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorised person.
- The right to access the personal information that we hold about you.
- The right to rectify/correct/update inaccurate personal information and to update incomplete personal information.
- The right to request that we correct, destroy or erase your personal information in certain circumstances.
- The right to object to or restrict us processing your personal information.
- The right to request the transfer of your personal information to you or to a third party.
- The right not to be subject, under certain circumstances, to automated-decision-making processes.
- The right to object at any time to the processing of your personal information for direct marketing purposes.
- The right to lodge a complaint with the relevant regulatory body which, for the purposes of POPI, is the Information Regulator. The Information Regulator can be contacted by email: complaints.IR@justice.gov.za or inforeg@justice.gov.za.

- The right to institute civil proceedings in relation to your personal information.

You will not generally have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If you would like to exercise any of your rights in respect of your personal information or have any queries or complaints on how we have handled your personal information, please contact us via our information officer so we can investigate the matter.

Policy Amendments:

We may amend this Policy from time to time for any of the following reasons:

- To provide for the introduction of new Services.
- To comply with changes to any legal or regulatory requirement/s.
- To ensure that this Policy is clear and up-to-date.
- To rectify any mistake that may be discovered from time to time.
- For any other legally permissible reason, in our discretion.

We will take reasonable steps to notify you of such an amendment, including publication on our website. **It is your responsibility to check our website regularly.**