

Privacy Policy

INOXICO (PTY) LIMITED ("INOXICO")

Inoxico (Pty) Limited ("Inoxico") strives to ensure that your privacy is protected. This Privacy Policy therefore regulates the manner in which we collect, use, process, disclose, transfer, and retain personal information.

We comply with the National Credit Act, 2005 (No.34 of 2005) ("NCA"), the Protection of Personal Information Act, 2013 (No. 4 of 2013) ("PoPIA") and the principles outlined in Sections 50 and 51 of the Electronic Communications and Transactions Act, 2002 (No.25 of 2002) which govern the rights to having personal information kept private of which these principles are covered in this Privacy Policy.

Use and Disclosure of Personal Information

Inoxico limits the use and disclosure of personal information to include only what is permitted and prescribed in terms of the NCA, PoPIA or any other applicable laws or in instances where consumers have consented to such collection, use and disclosure.

Confidentiality of Personal Information is important to us. Unless we have consent or permission under national laws, we will not sell, rent or lease Personal Information to others. We will not use or share Personal Information in ways unrelated to the circumstances described in this Privacy Policy.

Unless permitted by the laws or with consent, we do not use any of Personal Information concerning the religious, or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information.

Specifically, we use and disclose information in the following circumstances:

- **Our Credit/Risk Reporting Business.** Inoxico compiles Credit Information contained in customer/credit and supplier vetting reports from applications, for example for credit providers or services providers for credit or services.

The following Information is included in such reports:

- Identifying information, such as: business name, business registration number, business address, director/member names, director/member ID numbers, physical and postal addresses, contact numbers;

- **Account History or Payment Profile:** The account history or payment profile is a record of all known accounts with credit or service providers and a history of how those accounts are paid;
- **Enquiries:** a list of credit or service providers authorized (with consent) or permitted in terms of the NCA to receive a credit report;
- **Public Records:** Information that is publicly available as permitted by law such as judgments, administration orders, sequestrations, and rehabilitation, liquidation applications, company registration information, tax information;
- **Default Data:** a default is recorded on your credit profile when you fail to make the payment of money owed. default data is submitted by the credit or service providers to the credit bureaus;
- where applicable, to create a user account (login user name and password);
- to fulfil your requests for any information which you're entitled to request and access;
- to provide service and support;
- to help us develop, deliver, and improve our products, services, content, and advertising;
- to send important communications regarding any purchases or changes to the terms and conditions and or to advise you of any other important circumstances;
- for internal purposes such as auditing, data analysis, and research to improve Inoxico products, services, and customer communications; and
- for purposes of any Inoxico promotional competitions.

Direct Marketing. We will use Personal Information for the direct marketing purpose only if consent was provided to us or it is permitted by the laws.

- One may sign up for our news by clicking the opt-in during the online ordering process by ticking the opt-in box that states,
- Inoxico will access, use, process and analyse Personal Information provided, Credit Information, Internet Information and Marketing Data to provide personalized offers of Inoxico and our trusted partners.
- In case one no longer wants to receive such communication, one may opt-out of such communications by clicking on unsubscribe or calling our marketing department and asking to be taken off the list.

Compliance with laws and regulations. We may only access, use and/or disclose Personal Information without consent in exceptional circumstances. These include circumstances where such action is necessary to:

- comply with the law or legal process served on us;
- comply with requests for information from police or government authorities;
- protect and defend our rights or property (including the enforcement of our agreements);
- protect the public interest;
- act in urgent circumstances to protect the personal safety of our employees or members of the public;
- where applicable, with implied consent; and
- to the extent permitted or required in terms of the NCA, PoPIA and other relevant national legislation.

- **Market Research.** Participation in market research activities is optional. Should one choose to participate, we may use information provided to improve the experience of our products and services. We may engage third parties to assist us with our market research efforts who may retain non-personal aggregated information. However, all Personal Information provided will only be used for our research purposes.
- **Recruitment.** When you apply for employment, we use Personal Information for recruitment purposes only.

Retention Of Information

We retain Personal Information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws and consent to such purpose(s) remains valid.

Furthermore, we retain your Credit Information in our credit information database in accordance with the data retention periods prescribed by the NCA.

Transfer of Personal Information Outside

Unless prohibited by the law, Inoxico makes use of cloud storage of data that exists both in South Africa and in Northern Europe. We will only transfer Personal information to jurisdictions that have equal or stronger privacy regulations, such as the European Union.

Rights and Participation

Inoxico aims to ensure that Personal Information is accurately recorded. To be able to achieve this, we adhere to processes that help ensure and maintain data accuracy. We provide reasonable access to review and correct Personal Information, as detailed in our website.

When gathering Information Inoxico works with data suppliers to increase their awareness of the importance of providing only Information that is accurate, complete, and up to date. Inoxico however, cannot alter the information reported by such data suppliers, unless the information is determined to be wrong, incomplete, or inaccurate. If you do not agree with the accuracy of information Inoxico has on file, we have procedures in place to ensure that such information is verified, and where appropriate, amended or corrected. We however rely on others to bring any such information challenges to our attention.

Unless otherwise provided in any laws, you has the right to access, update, correct or object to processing of one's Personal Information. One may contact us:

- **by e-mail:** support@inoxico.com
- **by phone:** Inoxico Contact Centre: 010 007 2600

Inoxico makes reasonable efforts to incorporate the changes in Information that we maintain as soon as practicable.

One has the right to lodge a complaint with the Information Regulator:

- **by e-mail:** infoereg@justice.gov.za;
- **to the following postal address:** SALU Building, 316 Thabo Sehume Street, PRETORIA; or
- **by telephone:** 012 406 4818; or **by Fax:** 086 500 3351.

Online Information

When you visit and use any Products or functions in Inoxico sites, we may collect the behavioural data and general internet data, including your internet protocol ("IP") address, metadata, location data, date and time you visit:

- A "cookie" is also set on your computer to allow us to recognize you whenever you visit and collect information, like the pages you visit and the preferences you choose. We use the information we collect for statistical purposes and to study how Inoxico sites is used so that we may improve and enhance your experience on Inoxico sites. We may provide such information collected to outside vendors located overseas for such purposes. No personal information is stored in cookies. It is possible for you not to accept our cookies while using Inoxico sites by setting the preference in your web browser. If you do so, you may not be able to apply for credit reports online but you can still visit the pages in Inoxico sites. If you would like more information about cookies, you can visit http://www.cookiecentral.com/n_cookie_faq.htm. Inoxico uses two different types of cookies.

One type of cookie is used so that Inoxico sites "recognize" you each time you return using the same computer, and you do not have to re-enter all your personal information on each visit. You can set your web browser to refuse to accept this cookie, or delete this type of cookie from your hard drive, and still access our products and services, as long as you re-enter information each time you visit. The second type of cookie is needed so that we can process each step of your transaction with us. If you refuse to accept this type of cookie, you will not be able to access our products and services. Most web browsers automatically delete this type of cookie when you terminate your session;

- We may use domestic or overseas third-party advertising companies to serve ads on Inoxico sites or on other sites which we use for advertising. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness; and they are not authorized to use the information we share with them for any other purpose. Any information that these third parties collect via cookies and action tags is completely anonymous.
- We may use Google Analytics or other similar analytical tools to obtain information collected in order to display, optimize and personalize advertisements and customer experience on our web properties that are designed to bring visitors to Inoxico sites, to determine which advertisements you may find useful, and to personalize your experience on Inoxico sites and web properties. We may also use this information to segment, enhance or modify our advertisements and to personalize your experience; and/or
- Anonymous Data: In order to enhance the usefulness of Inoxico sites and our Services, Inoxico will collect data about our customers' use of Inoxico sites, in a manner that does not include any Personal Information. While you browse the Inoxico sites, we note which pages of Inoxico sites you visit and note the IP address of your computer (as all web sites do automatically), but we do not link that address information to your personal information, other than for purposes of authentication and protection of your personal information when you access the Site electronically. The general information we gather

enables us to serve our customers better by continually enhancing Inoxico sites based on up-to-date use patterns. We are provided anonymous information collected from other web sites on which we display advertisements that enables us to understand how visitors to Inoxico sites, who were exposed to ads we have placed on those other web sites, interact with Inoxico sites. We may use this information to enhance or modify our campaigns that are designed to bring we visitors to Inoxico sites. You may opt-out of this anonymous data collection and sharing activity by visiting the Google Analytics Privacy Overview web page and following the procedures noted under the Browser Opt-Out and Privacy Center information sections (search for these sites through www.google.com).

- **Behavioral Data:** Behavioral data is the information which Inoxico will use to serve you with personalized offers of Inoxico and our trusted partners. This data includes your interaction with our Products and Services in Inoxico sites, including but not limited to information searched, transaction conducted, purchase history etc. The information Inoxico gathers is for the purpose of enhancing the relevancy of the personalized offers. All these data will be kept in our secure server and no Personal Information will be transferred to any third parties.

Marketing Data: The information we collect for our Digital Marketing business is segregated from our Credit Information. Marketing Data may include information on businesses and related persons as well as non-personal aggregated information and advertising program performance data. Marketing Data includes information about businesses, such as size, industry, location and quality.

Security of Your Information

Inoxico takes security and the protection of Personal Information and Consumer Credit Information seriously. We maintain physical, technical and organizational safeguards to protect any data that we collect. We have adopted procedures to secure storage of Personal Information and are committed to working with our data suppliers to protect the security of Personal Information during any transfer to or from us. Furthermore, your Personal Information is only accessible to those Inoxico employee members, agents or contractors for business purposes and on a strictly need to know basis.

On Inoxico sites, we take precautions to secure Personal Information. If, and when we ask for Personal Information, we do so through a Web page that uses the industry standard secure transport protocols. These protocols provide security for information by encrypting it as it travels from the information provider to our servers.

To protect privacy and security, we will also take reasonable steps to verify identity before granting access to or making alterations to data we maintain.

Compliance and Enforcement Of this Privacy Policy

Our compliance with this Privacy Policy will be monitored on a quarterly basis. Inoxico reserves the right to modify this Privacy Policy. The Privacy Policy posted at any time via Inoxico sites shall be deemed to be the Privacy Policy then in effect.

Any queries on our Privacy Policy or the manner in which Personal Information is treated, we encourage any such queries or concerns to be directed to us at support@inoxico.com. We will ensure you are contacted without delay in an effort to respond to your queries and/or attempt to resolve your concerns in accordance with the principles embodied in this Privacy Policy.