WEBSITE AND SOCIAL MEDIA PROCESSING NOTICE

PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 ("POPIA") [Proofreading correction: "Protection of Personal Information Act".]

Please read this Notice before providing personal information to Martech SA (Pty) Ltd or using its Website, email, social-media pages or digital services. This Notice explains the processing practices relevant to those channels. Merely providing information, browsing the Website or continuing to use a service does not constitute blanket consent to every processing purpose.

1. INTRODUCTION

1.1 Martech SA (Pty) Ltd, a private company incorporated in South Africa, is referred to in this Notice as "Martech SA", "the Company", "we", "us" or "our". Its principal address is 60 Mill Street, Paarl, 7646, South Africa.

1.2 In terms of a law known as the Protection of Personal Information Act, No. 4 of 2013, (POPIA) everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one's Personal Information.

1.3 In order to give effect to this right, the Company is under a duty to provide any person whose personal information is processed by it, known as a data subject, with a number of details pertaining to the use of and subsequent processing of the data subject's personal information, before such information is used or processed.

1.4 In accordance with this requirement, the Company sets out below:

- The reasons why it will be required to process a data subject's personal information;
- The conditions under which it will receive and use a data subject's personal information;
- How the Company will use and handle this personal information; as well as
- the persons or categories of persons to whom personal information may be supplied;
- the nature and categories of information;
- cross-border transfers;
- security, retention and data-subject rights; and
- the consequences of not providing information where it is mandatory or necessary.

2. APPLICATION

2.1 This Processing Notice applies to visitors to the Website; prospects and customers who contact us by telephone, email, website form, social media or another communication channel; users and authorised representatives of customers; recipients who interact with email-signature branding or other digital content delivered through our services; and other persons who interact with Martech SA through its Website, email, social-media and electronic platforms, events or digital services.

2.2 This privacy policy furthermore applies to:

2.2.1 the data subjects who may make use of, or access the Company social media and electronic platforms and all the processing of personal information by the Company as a result of a data subject making use of, or accessing the Company social media and electronic platforms except to the extent that a separate POPIA policy has been issued in respect of a specific service or product and related processing activities; and

2.2.2 all personal information processed by or for Martech SA as a result of a person accessing or using the relevant email, Website, social-media or digital platforms. Personal information is not described as being "owned" by Martech SA or the data subject.

3. ACCOUNTABILITY

3.1 The Company takes the privacy and protection of a data subject's personal information very seriously and will only process a data subject's personal information in accordance with POPIA and the terms of this privacy statement.

3.2 Where Martech SA discloses personal information to an operator, the operator must process it only with the Company's knowledge or authorisation, maintain confidentiality and apply the security measures required by POPIA and the written operator agreement. A third party acting for its own statutory or independent purpose may be a separate responsible party.

3.3 Accordingly, the relevant data privacy principles relating to the processing of personal information, whether that belonging to the Company or that belonging to a data subject (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will apply without exception, save where POPIA provides for such an exception, to all and any personal information provided by the Company to another or received by the Company as a result of the use of the Company email, and / or social media and electronic platforms.

4. AGREEMENT TO BE BOUND AND CONSENT TO PROCESS

4.1 By accessing or using the Company website and URL's, any sites housed under its domain names and / or social media platforms, and / or when sending or receiving emails using the Company email, the data subject;

4.1.1 Acknowledges that it has read and understood this processing notice and related provisions;

4.1.2 agrees to be bound by this processing notice and the privacy policy;

4.1.3 agrees to comply with this processing notice and privacy policy; and

4.1.4 gives the Company consent to process and further process the required personal information in accordance with this processing notice.

5. RECEIPT, USE AND SHARING OF PERSONAL INFORMATION BY THE COMPANY

5.1 The Company will receive personal information pertaining to a data subject when the data subject submits a query or request via the Company website, or by way of email, telephone or via social media. Information may also be collected when a person creates or administers an account, orders or uses a service, requests support, interacts with email-signature branding, opens an email or selects a link, attends an event, or uses a Website feature.

5.2 Depending on the interaction, Martech SA may process name and surname; business contact details; company, role, registration and VAT information; postal or street address; account credentials; order, billing and transaction information; service configuration and support records; correspondence; browser, device, IP address, access, diagnostic, security and audit information; social-media interactions; cookie and Website-use information; and marketing preferences.

5.3 For email-signature interaction analytics, the information may include name, email address, IP address, click time, domain name and the destination URL selected by the client-defined branding. Where a name or another direct identifier is retained, the information is not anonymous.

5.4 On receipt of the request or query, the Company will thereafter use and process the data subject's personal information for a variety of purposes, depending on the query or request, which without detracting from the generality thereof may include:

- for the purposes of identifying and / or verifying the data subject’s details;
- to provide, administer, configure, support, secure and improve products and services;
- to authenticate users, maintain account and service security, prevent abuse and investigate technical or security incidents;
- to process orders, billing, transactions, invoices, contracts, records, disputes and lawful claims;
- to record and respond to support requests, enquiries, complaints and other communications;
- for the purposes of providing information, products and / or services that the data subject, may have requested;
- for employment application purposes;
- for the purposes of managing any information pertaining to the data subject;
- for general administration purposes;
- for legal or contractual purposes;
- to help the Company improve the quality of the Company’s products and services;
- to help the Company detect and prevent fraud and money laundering;
- for the purposes of recovering unpaid fees and / or any other amount due to the Company;
- for the purpose of debt collection;
- for research, analytics, statistics, service improvement and Website performance, using aggregated or de-identified information where reasonably practicable;
- for the purpose of carrying out analysis of customer profiling;

- for direct marketing only where permitted by section 69 of POPIA, the Consumer Protection Act 68 of 2008 and applicable regulations. Prospective customers may be approached once to request consent where the statutory requirements are met. Existing-customer marketing will concern Martech SA's own similar products or services and provide a free opportunity to opt out when details are collected and with every communication. Objections and opt-outs will be recorded and honoured.

5.5 In order to correctly handle any request or query, and in order to perform the purposes described above, the Company may from time to time share a data subject's personal information with the following parties:

- the Company employees, which will only be done on a need-to-know basis;
- business partners and service providers where disclosure is necessary for a documented purpose, based on an applicable lawful ground and subject to appropriate confidentiality, security and contractual safeguards; and
- the Company operators such as service providers and agents who perform services on our behalf which will only be done on a need-to-know basis and in terms of an operator agreement. This may include hosting, communications, support, security, analytics, payment and other providers listed, where applicable, in Martech SA's published sub-processor information.

5.6 The Company does not share a data subject's personal information with any third parties who have not been described above, unless:

- the Company is legally obliged to provide such information to another for legal or regulatory purposes;
- the Company is required to do so for purposes of existing or future legal proceedings;
- the onward transmission or sharing of personal information is necessary for the pursuance or protection of the Company's legitimate interests or that of the data subject or a third party;
- the Company is involved in the prevention of fraud, loss, bribery or corruption and is using another agent or service provider under a mandate to provide such service,

and under all of the abovementioned circumstances, the Company will take reasonable measures to ensure that such personal information is only provided to the recipient if such recipient undertakes to keep the information confidential and secure.

Other recipients (third parties) may include regulators, law-enforcement bodies, courts, professional advisers, insurers, auditors and a purchaser or investor in connection with a merger, acquisition, reorganisation, financing or sale, where lawful and reasonably necessary

5.7 Where personal information is transferred outside South Africa, Martech SA will ensure that the transfer complies with section 72 of POPIA, including through an adequate legal framework, binding corporate rules or agreement providing adequate protection, valid consent where legally appropriate, contractual necessity or another statutory exception.

6. RECEIPT, USE AND SHARING OF THE COMPANY PERSONAL INFORMATION

Information supplied by Martech SA in response to an enquiry remains subject to applicable confidentiality, intellectual-property, contractual and acceptable-use requirements. This provision does not alter the data subject's statutory rights in relation to personal information.

7. INFORMATION QUALITY / OPENNESS / DATA SUBJECT PARTICIPATION

7.1 Martech SA will take reasonably practicable steps to keep personal information complete, accurate, not misleading and updated where necessary, having regard to the purpose for which it is processed. Data subjects are encouraged to notify Martech SA of relevant changes.

7.2 Subject to POPIA, PAIA and lawful limitations, a data subject may ask whether Martech SA holds personal information about them; request access; request correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained information; request destruction or deletion of information that Martech SA is no longer authorised to retain; object on reasonable grounds to processing based on specified POPIA grounds; object at any time to direct marketing; withdraw consent where processing depends on consent; and lodge a complaint with the Information Regulator. Requests may be sent to privacy@martechsa.com and reasonable proof of identity may be required.

8. SECURITY OF PERSONAL DATA

8.1 The Company makes all reasonable efforts to keep its website secure at all times, however advises that it cannot guarantee the security of any information provided to us or by us through the Company website, email, internet or social media sites. The Company cannot be held responsible for any loss or unauthorized use or interception of information transmitted via these sites, such as the internet which is beyond the Company's reasonable control. Martech SA implements appropriate, reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised destruction, unlawful access or processing, interference, alteration and disclosure. No Internet transmission or electronic storage method is completely secure, but this does not limit Martech SA's statutory security obligations.

8.2 The Company website may contain links to other websites outside of the Company's control. The Company is not responsible for the content, privacy or security of these other third party-controlled websites.

8.3 The Website uses cookies and similar technologies. Necessary cookies may support Website operation. Analytical and third-party technologies may be used for analytics, functionality or advertising. The Website Privacy Policy and Cookie Policy refer to Google Analytics, Google DoubleClick, Google Dynamic Remarketing, Google reCAPTCHA and Google Maps.

8.4 The Website or social-media pages may link to or use features made available by third-party platforms. Those third parties process information under their own privacy terms. Martech SA will accurately identify material live integrations and

apply appropriate transparency, contractual, security and consent controls. Visitors should review the relevant third party's privacy information before providing personal information.

8.5 Note that all Telephone calls may be recorded and / or monitored for security and quality assessment purposes. Telephone calls will be recorded or monitored only where lawful, necessary and proportionate for a stated purpose, and callers will receive appropriate notice before or at the time of recording.

8.6 Subject to the provisions above, the Company has implemented the appropriate technical and organizational security measures which are required in order to protect all personal information that it holds from and / or against unauthorized access, accidental or wilful manipulation, loss or destruction.

9. DATA RETENTION

Martech SA retains personal information only for as long as necessary to achieve the purpose for which it was collected or subsequently processed, or as authorised or required by law, contract, a code of conduct, a reasonable business need or the protection of lawful interests. Different record categories may have different retention periods. When retention is no longer authorised, information will be destroyed, deleted or de-identified in a manner that prevents reconstruction, subject to lawful restrictions.

10. SECURITY COMPROMISES

Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, Martech SA will notify the Information Regulator and affected data subjects as soon as reasonably possible after discovery, subject to a lawful delay directed by an authorised public body. Operators must notify Martech SA immediately where there are reasonable grounds to believe that information processed for Martech SA has been compromised.

11. THIRD PARTY INFORMATION AND THAT BELONGING TO MINORS

11.1 If a data subject provides the Company with personal information on behalf of another, the Company will not be able to process the query or request unless such query or request is accompanied by the required permission and consent from the third party to process the third party's personal information.

11.2 If a data subject is under the age of 18, such person's personal information will only be processed if the minor's parent or legal guardian gives the required consent or permission to the processing.

11.3 The Website and Martech SA's products and services are not designed or intended for purchase or direct use by children under 18. We do not intentionally collect children's personal information through the Website without a competent person's consent or another lawful authorisation. If Martech SA becomes aware that a child submitted information contrary to this Notice, it will investigate and take appropriate action.

12. CONTACT DETAILS

12.1 For questions, rights requests or complaints, contact:
Martech SA (Pty) Ltd, 60 Mill Street, Paarl, 7646, South Africa
Information Officer: Henry Jonker
privacy@martechsa.com
Contact number as +27 21 872 2280.

12.2 A data subject may lodge a POPIA complaint with the Information Regulator (South Africa):
Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; telephone 010 023 5200
toll-free 0800 017 160
enquiries@inforegulator.org.za
POPIAComplaints@inforegulator.org.za

13. WEBSITE LEGAL DOCUMENTS

This Notice should be read with the Website Privacy Policy, Cookie Policy, Website Usage terms, Acceptable Use Policy and published sub-processor information. The live Website, cookie-consent configuration and service functionality must remain consistent with those notices. If there is an inconsistency concerning personal-information processing, applicable law and the more specific notice for the relevant activity will prevail.

14. REVISION OF POLICIES

Martech SA may update this Notice to reflect changes to its practices or for operational, legal or regulatory reasons. The current version and effective date will be made available on the Website or through another appropriate channel. Where a change is material and applicable law requires notice, Martech SA will provide notice by email, on the Website, through the relevant service or by another reasonable method.