



## PRIVACY POLICY

**Amoeba Mobile Solutions (Pty) Ltd ("Amoeba TSC")** is dedicated to protecting your privacy and complying with data protection and privacy laws. This Privacy Policy explains how we process your Personal Information, your rights as a Data Subject, and the legal safeguards in place.

**By submitting your Personal Information, you consent to its processing by Amoeba TSC. "Consent," "your consent," or "your explicit consent" includes ticking a tick box or clicking "Submit" or "I agree" on our website.**

**Please review this Policy to understand how and why we use your Personal Information.**

### IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY POLICY

This Policy explains how we process your Personal Information when you use our website, complete a "Contact us" form, or communicate with us via emails, electronic forms, or our social media pages. This website is not intended for children, and we do not knowingly collect data relating to children.

#### WE ARE THE RESPONSIBLE PARTY

**Amoeba TSC** (referred to as "we", "use", or "our") is responsible for the Personal Information we collect.

#### Information Officer ("IO"):

We have appointed an IO to manage questions and requests regarding this Privacy Policy. For any inquiries, please contact the IO using the details below.

<b>IO Name:</b>	Chris van der Walt
<b>Email address:</b>	<a href="mailto:chris@amoebatsc.com">chris@amoebatsc.com</a>
<b>Company address:</b>	13 Main Road, The Gate Office Park, Cnr John Vorster and Akkerboom Str, Centurion

<b>Deputy IO Name:</b>	Branden Schmahl
<b>Email address:</b>	<a href="mailto:branden@amoebatsc.com">branden@amoebatsc.com</a>
<b>Company address:</b>	13 Main Road, The Gate Office Park, Cnr John Vorster and Akkerboom Str, Centurion

#### CONCERNS

If you're unhappy with how your information is handled, you can also contact the Information Regulator (IR) at <http://www.justice.gov.za/inforeg/>. However, we'd like the opportunity to resolve your concerns first.

#### CHANGES TO THIS POLICY & KEEPING YOUR INFORMATION CURRENT

We review and update this Policy regularly. New versions are posted on our website and become effective immediately.

Please let us know if your Personal Information changes during your relationship with us.

#### INTEGRATION WITH OTHER SITED

This Policy applies solely to our website and electronic communications. We don't control other sites that may offer services or products to Amoeba TSC, and they may have their own privacy practices. **AMOEBATSC SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY.**

### THE INFORMATION WE COLLECT

**We collect Personal Information as outlined in this Policy. This does not include data from which the identity of the Data Subject has been removed, rendering it anonymous.**

**When interacting with you, we may process various types of Personal Information, which we have categorized as follows:**

Type of Data	Details
<b>Identity Data</b>	First name, Last name, Username or similar identifier, Title, Date of birth, Gender.
<b>Contact Data</b>	Billing address, Delivery address, Email address, Telephone numbers.



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<b>Financial Data</b>	Payment card details.
<b>Transaction Data</b>	Details about payments to and from us and other details of goods and/or services you have acquired from us.
<b>Technical Data</b>	Internet protocol (IP) address, Your login data, Browser type and version, Time zone setting and location, Browser plug-in types and versions, Operating system and platform, Other technology on the devices you use to access this website/ portal.
<b>Profile Data</b>	Your username and password, Purchases or orders made by you, Your interests, Preferences, Feedback and survey responses.
<b>Usage Data</b>	Information about how a Person uses our website products and/or Services. This information shall include: the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), use of a certain function on any Service and methods used to browse away from the page and any phone number used to call our client service number, service transaction instructions from and to you via our APIs.
<b>Marketing and Communications Data</b>	Marketing preferences in receiving marketing from Amoeba TSC and third parties, your communication preferences (communications related to the Services).
<b>Aggregate data and pattern data ("Pattern Data"):</b>	Statistical, demographical or transactional information derived from Personal Information but is not considered Personal Information in law as this data will not directly or indirectly reveal the identity of the Data Subject. For example, we may aggregate the Usage Data of a Data Subject to calculate the percentage of users accessing a specific website or specific Service feature or executing a specific transaction type. However, if we combine or connect Pattern Data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Privacy Policy.
<b>Additional Personal Information</b>	You may choose to provide additional Personal Information to us. When you do so, you agree to provide accurate and current information, and to not impersonate or misrepresent any person or entity or falsely state your affiliation with anyone or anything.
<b>Special Personal Information and Children Information</b>	We do not collect any Special Personal Information or Children Information directly from Data Subjects.

### KINDLY NOTE

You may voluntarily provide us with additional Personal Information, in which case you agree to supply accurate and up-to-date details. You must not impersonate or misrepresent any individual or organization, nor falsely claim an affiliation with any party.

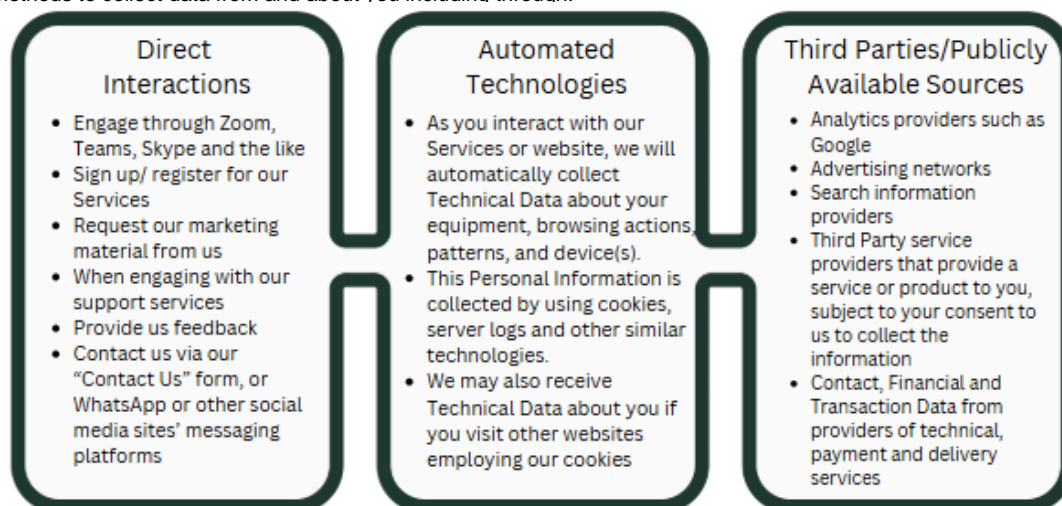
We do not collect any Special Personal Information about you unless it is necessary in the course of providing our Services, and only then with your explicit consent.

**Submission of Personal Information on another's behalf:** If you submit Personal Information on behalf of someone else, you are responsible for obtaining that individual's consent before sharing their data with us. Upon receipt of such information, we will assume the required consent has been secured and will process the data according to your instructions. By submitting Personal Information on behalf of another person, you agree to indemnify us against any third-party claims arising from data processed without the necessary consent or other lawful basis.

If we are required by law or by the terms of a contract to collect certain Personal Information and you fail to provide it when requested, we may be unable to fulfill our contractual obligations to you (for example, by providing Services, whether free or paid). If this occurs, we may need to cancel a Service you receive from us, but we will notify you of such a situation at the relevant time.

### How is Personal Information collected?

We use different methods to collect data from and about you including through:





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## COOKIES

Refer to our Cookies Policy.

## HOW WE USE YOUR PERSONAL INFORMATION

At AmoebaTSC, we handle your Personal Information only for legitimate business reasons and in strict accordance with the law. Here's what that means for you:

- **No Selling of Your Data:** We will never sell your personal information.
- **Lawful Use Only:** We only process your personal information when it is legally permitted. In practice, this means we do so when:
- **You Consent:** We use your information when you have given us clear permission.
- **Contractual Necessity:** We need your information to perform, enter into, or complete a contract with you.
- **Legitimate Interests:** We process your data if it is necessary for our (or a third party's) legitimate business interests—provided that your rights and interests are not overridden.
- **Legal Obligations:** We are required to use or disclose your data to comply with a legal obligation.
- **Marketing Communications:** We will ask for your explicit consent before sending you any third-party direct-marketing emails or text messages. You are free to withdraw this consent at any time by contacting us or using the opt-out options provided.

### Details on How We Use Your Information:

The table below explains the various ways we process your Personal Information along with the legal basis for each purpose. In some cases, more than one legal basis might apply. If you need further details about the specific legal grounds we rely on for any purpose, please contact us.

Purpose of Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register an Amoeba TSC Client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Performance of a contract with you</li> </ul>
Delivery of Services to Amoeba TSC Clients, including but not limited to sharing of information with External Parties as part of the Services	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Performance of a contract with you</li> </ul>
Manage payments, fees and charges Collect and recover money owed to Amoeba TSC	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us) [TAKE NOTE: we do not store Financial Information - card details. We use third party service provider(s) to execute transactions where you use your card. You should read their privacy policy]</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our Terms of Services or this Privacy Policy where required</li> <li>• Asking you to leave a review</li> <li>• General Service communications.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)</li> </ul>
To administer and protect our business, website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website and Service content and information about similar services and/or products to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing &amp; Communications</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
To use data analytics to improve our website, Services, marketing, client relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To make suggestions and recommendations to you about Services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to develop our services and grow our business)</li> </ul>

- **Please note that opting out of marketing messages does not affect the personal information we use for processing your service purchase or other transactions.**



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## Change of Purpose

We will only use your Personal Information for the purposes we originally collected it for, unless we determine that using it for a new reason is compatible with that original purpose. If you'd like an explanation of how a new use fits with the original purpose, please contact us. If we ever need to use your Personal Information for a completely different purpose, we will let you know and explain the legal basis that allows us to do so.

Additionally, there may be times when we process your Personal Information without your direct knowledge or consent, as required or permitted by law.

## DISCLOSURES OF PERSONAL INFORMATION

We might disclose your Personal Information to the following parties for the purposes outlined in the table above:

- **Internal Third-Parties:** As defined in our policy, when sharing Personal Information within our group—including affiliated companies, partners, or agents—we make sure that every party involved complies with this Policy to protect your information.
- **External Third-Parties:** As defined in our policy.
- **Other Third-Parties:** This includes parties to whom we might decide to sell, transfer, or merge part or all of our business or assets. Likewise, if we acquire or merge with another business, the new owners may use your Personal Information in the same manner as described in this Privacy Policy.

We require all Third-Parties to safeguard your Personal Information and comply with legal standards. Our Third-Party service providers are not permitted to use your Personal Information for their own purposes; they may only process it for the specific purposes we have outlined and under our instructions.

## INTERNATIONAL TRANSFERS

### DATA TRANSFERS ABROAD

Some of our external partners are located outside your country. This means that when they process your Personal Information, your data might be transferred to another country.

### SAFEGUARDS FOR INTERNATIONAL DATA TRANSFERS

Whenever we transfer your Personal Information out of your country, we take steps to ensure it remains well protected. We do this by applying at least one of the following measures -

- **Transfer to Countries with Strong Laws:** We only send your Personal Information to countries that have robust data protection and privacy laws.
- **Binding Agreements with Service Providers:** When we work with service providers, we enter into agreements that require them to keep your Personal Information confidential, only process it under our instructions, and use appropriate technical and organisational measures to safeguard it.

### YOUR CONSENT TO INTERNATIONAL TRANSFERS

By submitting your Personal Information to us, you agree that we may transfer it outside your country when necessary.

## DATA SECURITY

We use strong technical and organizational safeguards to protect your Personal Information from accidental loss, unauthorized use or access, changes, or disclosure. Only those employees, agents, contractors, and third-parties who need this information for business purposes can access it, and they must follow our instructions and keep it confidential.

We have procedures in place to address any suspected breach of Personal Information. If a breach occurs, we will notify you and any relevant regulatory authority as required by law.

Under section 54 of the Cybercrimes Act, Act 19 of 2020 (click on link to view), electronic communications service providers and financial institutions must report certain offenses to the South African Police Services (SAPS) within 72 hours.

## DATA RETENTION

### HOW LONG WILL WE USE YOUR PERSONAL INFORMATION FOR?

We keep your Personal Information only as long as needed to fulfill the reasons we collected it, including meeting any legal or reporting requirements.

- **How Long?** The retention period depends on factors like the type and sensitivity of the data, the potential risks, and legal obligations.
- **Possible Extensions:** We might keep your information longer if there's a complaint or potential legal issue.
- **Legal Requirements:** We are legally required to keep basic client data (Contact, Identity, and Transaction Data) for five years after you stop being a client, for tax purposes.
- **Your Rights:** In some cases, you can request that we delete your data.
- **Anonymized Data:** We may anonymize your data for research or statistical purposes, allowing us to use it indefinitely.



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## SOCIAL MEDIA

**Social Media Integration:** Our website uses social media plug-ins (like Facebook, Instagram, and LinkedIn). If you interact with these (e.g., log in through our site or click a link), your activity on our website may be shared with that social network, as is the deal between us. If you're already logged into a social network while visiting our site, or if you interact with the social plug-ins, they might add this visit information to your profile, depending on your privacy settings. To prevent this, log out of your social network account before using our website or adjust your privacy settings, if possible.

- **External Social Media:** When you interact with us on social media, your activity is subject to the terms and privacy policies of that specific platform.
- **Use Social Media Wisely:** Be careful and aware of privacy policies when using social media. **Important:** We will *never* ask for personal or sensitive information through social media. If you need to discuss sensitive details or resolve an issue, please contact us directly via phone or email.
- **Links on Social Media:** We may share links to relevant web pages on our social media. Be cautious when clicking shortened links, as social media platforms can be vulnerable to spam or hacking. We try our best to post genuine links, but we are not responsible for any harm caused by clicking on shortened links found on social media.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:

- **Access Your Data:** You can ask for a copy of the Personal Information we hold about you and check if we are using it legally. This is called a "Data Subject access request." Note that a fee may apply.
- **Correct Your Data:** If any of the information we have about you is incomplete or incorrect, you can ask us to correct it. We might need to verify the updated information you provide.
- **Delete Your Data:** You can ask us to delete your Personal Information if there's no good reason for us to keep processing it. You also have this right if you successfully object to our processing, if we processed your information illegally, or if the law requires us to delete it. We might not always be able to delete all your data due to specific legal reasons, which we will explain to you if applicable. Please note that erasing your Personal Information does not limit our rights in terms of Aggregate Data and Pattern Data
- **Object to Data Use:** If we are using your Personal Information based on a "legitimate interest" (or a third party's), and you feel this impacts your rights and freedoms, you can object. You can also object if we are using your data for direct marketing. We might have compelling reasons to continue processing your information, which override your rights, but we will explain this to you if it's the case.
- **Limit Data Use:** You can ask us to temporarily stop processing your Personal Information in the following situations -
  - (1) You want us to check if the data is accurate.
  - (2) Our use of the data is illegal, but you don't want us to delete it.
  - (3) You need us to keep the data to establish, exercise, or defend legal claims, even if we don't need it anymore.
  - (4) You have objected to our use of your data, and we need to check if we have overriding legitimate reasons to use it.
- **Transfer Your Data:** You can request that we transfer your Personal Information to you or another company in a standard, easily readable format. This right applies only to information you gave us consent to use automatically or when we used the information to fulfill a contract with you. Contact us if you need to transfer your Personal Information.
- **Withdraw Consent:** If we are using your Personal Information based on your consent, you can withdraw that consent at any time. This won't affect anything we did before you withdrew your consent. However, we might not be able to provide you with certain services if you withdraw your consent. We will let you know if this happens.

**How to Exercise Your Rights:** To use any of these rights, please contact us.

**Fees:** Generally, you won't have to pay a fee to access your Personal Information or exercise your rights. However, we may charge a reasonable fee or refuse to comply if your request is clearly unfounded, repetitive, or excessive, unless there are prescribed fees under any applicable data protection legislation.

**Verification:** To protect your data, we might need to ask you for specific information to confirm your identity before granting you access to your Personal Information or allowing you to exercise your rights. We might also contact you for more information to speed up our response.

**Response Time:** We aim to respond to all valid requests within 30 days. If your request is complex or you have made multiple requests, it might take longer. We will notify you if this happens and keep you updated.



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### Definitions

- **Data Subject** means the person to whom Personal Information relates and, in this policy, refers to you as the party providing Personal Information that will be processed by Amoeba TSC or a relevant third-party.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Personal Information** means as defined by the Protection of Personal Information Act, 4 of 2013.
- **Responsible Party** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information.
- **Services** has the same meaning as per our Terms of Use.
- **Special Personal Information** means information that may be sensitive information, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences.
- **Third- Parties:**

**Internal Third-Parties:** Partners, affiliates, employees, shareholders, directors and/ or agents of Amoeba TSC (if applicable), acting as joint responsible parties or operators and who may also provide IT and system administration services and undertake leadership reporting.

**External Third-Parties:**

- (1) Service providers acting as operators who provide IT and system administration services.
- (2) Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- (3) The Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties who require reporting of processing activities in certain circumstances.
- (4) Courts of law or any other authorities where we have an obligation under law to share your Personal Information.
- (5) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.

**END OF POLICY**