



Privacy Policy in terms of the Protection of Personal Information Act, 4 of 2013 (“POPIA”)

PRIVACY STATEMENT AND POLICY

Trive South Africa (Pty) Ltd (hereinafter referred to as “**Trive SA**”) respects your privacy and is committed to keeping your information confidential.

SCOPE

Your privacy is important to Trive SA. This Privacy Statement and Policy applies to the collection of Personal Information via products, services, websites, and events operated by our Company. In general, you can visit our website: www.trive.co.za without having to divulge any Personal Information about yourself. However, kindly take note that while using our website you may be required to provide certain information about yourself or it may be collected by us.

You may update your Personal Information at any time by e-mailing us. You may also view your Personal Information held by us and correct it if necessary upon written request to us marked for the attention of the Information Officer.

Access to your Personal Information held by us may also be requested by yourself and/or third parties (under certain circumstances). The Promotion of Access to Information Act, 2 of 2000 (hereinafter referred to as “**PAIA**”) regulates and sets out the procedure to be followed for such a request, as well as the circumstances under which such access may be denied.

WHAT PERSONAL INFORMATION IS COLLECTED BY TRIVE SA AND HOW IS THAT INFORMATION USED?

Personal Information is used as is appropriate in the normal course of business to provide the products and services you have requested. We may retain any information for purposes of reporting and administration, to monitor our site or to communicate directly with you.

We collect information about individuals, users and professionals in a variety of ways including, but not limited to, directly from individuals (for example, when ordering a product, registering an account, using products, or signing up for a newsletter), from your employer, publicly available information, and through cookies, and/or similar technology.

We use the information primarily to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you.

We do not share any information you provide to us with any third parties, unless disclosed in this Privacy Statement, alternatively when we believe in good faith that the law requires it, or to protect the safety, rights or property of our Company, our members, customers or the general public.

HOW IS MY PERSONAL INFORMATION PROTECTED?

Trive SA takes all reasonable steps to protect your Personal Information, which is held in a firewalled server. We however cannot guarantee the security of any information you transmit to us electronically and you do so at your own risk.

We maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the Personal Information you or your employer provides to us.

We seek to ensure compliance with all applicable Data Protection/Privacy regulations, laws and industry best practices relating to security and protection of personal information.

If you are located in another country with different Data Protection/Privacy laws, we may transfer your Personal Information to a country that may not guarantee the same level of protection for Personal Information as the one in which you reside. By providing your information, you consent to these transfers.

WHO HAS ACCESS TO THE PERSONAL INFORMATION?

Trive SA will not sell, rent, or lease mailing lists or other customer data to any third parties, and we will not make your Personal Information available to any unaffiliated parties, except our approved agents, suppliers and/or contractors, or as otherwise described in this Privacy Statement.

We will not disclose any Personal Information or information about your usage of our products, websites or mobile applications to any unaffiliated third parties, except as necessary to enhance the product experience, service the legal agreement between us and your employer, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law.

HOW MAY YOU CORRECT, AMEND OR DELETE YOUR PERSONAL INFORMATION OR UPDATE YOUR PREFERENCES?

You may amend, update or delete your information at any time via the products or services, via the contact details provided in this Privacy Policy, or on our website contact page located at www.trive.co.za.

If you have any additional questions or concerns related to this Privacy Statement and/or our practices, please send us an email addressed to the Information Officer at travis.robson@trive.com.

1. PURPOSE

- 1.1. This Policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “**POPIA**”).

1.2. Trive SA is committed to:

1.1.1. Keeping information securely in the right hands; and

1.1.2. Retention of good quality and reliable information.

1.2. We further aim to ensure that any legitimate concerns of individuals about the manner in which their data may be used and processed are duly considered. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and be reasonable regarding what data is held and how it is used.

2. CLIENT INFORMATION

2.1. All Personal Information from our clients that we obtain and process is collected mainly to ensure compliance with applicable legislation as well as to provide our clients with the services that we offer, to help us improve our offerings to our clients, and in order to enable us to comply with all statutory requirements in rendering our services. We collect information about individuals, users and professionals in a variety of ways, including but not limited to: directly from individuals (for example, when ordering a product, registering an account, using a product, or signing up for a newsletter), from your employer, publicly available information, and through cookies, and/or similar technology. We primarily use the information to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you. We don't share any of the information you provide with any third parties, unless disclosed in this Privacy Policy, or when we believe in good faith that the law requires it, or to protect the safety, rights or property of Trive SA, our members, customers or the general public.

2.2. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of rendering services to our clients.

2.3. We collect the information we require directly from our clients. Where possible, we will inform our clients what information they are required to provide to us and what information is optional.

2.4. With our client's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to render our services to the client.

2.5. User-Supplied Information:

When you register for our services directly, we ask you to provide some personal information. For example: your name, ID number, address, telephone number, email address, payment card information (if required), and/or certain additional categories of information resulting from the use of our products, websites and services, such as research requests. We keep this information in a contact database for future reference, as needed.

2.6. Marketing:

We may use certain information you provide to us to offer you services that we believe may be of interest to you or for market research purposes. If you do not wish to receive such offers or to be contacted directly, you may opt out (unsubscribe) as described herein.

To update your preferences for email communications for our products, services, news updates, bulletins and reports, please contact us on the details provided.

2.7. How may I correct, amend or delete my Personal Information and/or update my preferences?

Where some of our products and/or websites make messenger, chat rooms, forums, message boards, or news groups available to you, please remember that any information disclosed in these areas is public. You should exercise caution when disclosing Personal Information in these areas. Do not disclose any information in these public forums that might be considered confidential.

2.8. Usage and Web Server Logs:

When you visit our websites, we may track information about your usage and/or visit, and store that information on usage or web server logs, which are records of the activities on our products or sites. Our servers automatically capture and save such information electronically. Some examples of the information we may collect include:

- Your unique internet protocol (IP) address;
- The name of your unique internet service provider;
- The city, state, and country from which you are accessing our website;
- The kind of browser or computer you use;
- The number of links you click within the site;
- The date and time of your visit;
- The web page from which you arrived at our site;
- The pages you viewed on the site;
- Certain searches/queries that you conducted via our product(s) and/or website(s).

The information we collect in usage or web server logs, helps us administer the product and site, analyse its usage, protect the product and/or website and its content from inappropriate use, and improve the user's experience.

2.9. Cookies:

In order to offer and provide a customized and personal service through our products and websites, we may use cookies to store and help track information about you.

A cookie is a small text file sent to your device that we use to store limited information about your use of the product or website. We use cookies to provide you with certain functionality (such as to enable access to secure log-in areas and to save you having to re-enter information into product or website forms) and to personalize our product or website content. Without cookies, this functionality would be unavailable.

By using our products and websites you agree that we can place these types of cookies on your device.

3. HOW DOES TRIVE SA PROTECT THE PERSONAL INFORMATION THAT IT COLLECTS?

We have implemented certain appropriate security measures to help protect your Personal Information from any accidental loss and/or from any unauthorized access, use, or disclosure. We store all information about you in a restricted access server with appropriate monitoring, and we use a variety of technical security measures to secure your data. In addition to the above, we also use intrusion detection and virus protection software.

Please note that we may store and process your Personal Information in systems located outside of your country of residence. However, regardless of where storage and processing may occur, we take appropriate steps to ensure that your information is adequately protected, in a manner consistent with the principles set forth under this Policy, and as required under Data Protection/Privacy laws.

4. EMPLOYEE INFORMATION

4.1. All Personal Information of our employees that we obtain and process is collected mainly to ensure compliance with applicable legislation and the successful operation of our business.

- 4.2. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of our operations.
- 4.3. With our employee's consent, we may also supplement any information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to comply with applicable legislation.

5. HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION

- 5.1. We will use our clients' and employees' information only for the purposes for which it was collected and agreed to with the relevant client and/or employee, for example:
 - 5.1.1. To provide our services to our clients, to carry out the transactions our clients requested, and to maintain our relationship;
 - 5.1.2. For audit and record keeping purposes; and/or
 - 5.1.3. In connection with legal proceedings.
- 5.2. We will also use our clients' and employees' information to comply with any legal and/or regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise required by law.

6. INFORMATION SECURITY

Trive SA will not sell, rent, or lease mailing lists or other customer data to any third parties, and we will not make your Personal Information available to any unaffiliated parties, except as follows:

- 6.1. When the data is collected from publicly available domains, including but not limited to: websites, company directories, company registrars, publicly available government lists, search engines and similar technology.
- 6.2. To agents and/or contractors who may use it on our behalf or in connection with their relationship with us (for example, we may use third parties to help us with promotional campaigns).

- 6.3. As required by law, in a matter of public safety or policy, as needed in connection with the transfer of our business assets (for example, if we are acquired by another company or if we are liquidated during bankruptcy proceedings), or if we believe in good faith that sharing the data is necessary to protect our rights or property.
- 6.4. We will not disclose any information about your usage to unaffiliated third parties, except as necessary to enhance the product experience, service the account, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law. We may also use statistics regarding usage for product development and/or enhancement purposes.
- 6.5. Your access to some of our services and/or content may be password protected. We recommend that you refrain from disclosing your username(s) and password(s) to anyone. We also recommend that you sign out of your product, account or service at the end of each session. You may also wish to close your product terminal or browser window when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place.
- 6.6. We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of such Personal Information. We are committed to ensure that all Personal Information of our clients or their businesses, as well as our employees, will be kept safe and secure and not be disclosed to any unauthorized third parties.
- 6.7. No employee of the Company shall be allowed to disclose any Personal Information of our clients or our employees to any unauthorised third party. Any breach in this regard may lead to disciplinary action being taken which may include summary dismissal.

7. ACCESS TO INFORMATION

- 7.1. Our clients and employees have the right to request a copy of the Personal Information that we hold about them or their business. Should you wish to obtain any such information, you can lodge such a request with the Company. We will take all reasonable steps to confirm your identity before providing any details of your Personal Information.
- 7.2. Any such access request may be subject to payment of an allowable administration fee as per our PAIA Policy and Procedure manual.

8. CORRECT INFORMATION

- 8.1. Our clients and former employees have the right to ask us to update, correct or delete their Personal Information. They may do this by contacting us on +27 10 157 5047 or by visiting our offices on appointment at 4 Karen Street Office Park, Bryanston, Sandton, 2191.
- 8.2. We will take all reasonable steps to confirm our client's identity before making any changes to Personal Information we may hold about that client.
- 8.3. We would appreciate if our clients and employees could keep their Personal Information accurate and up to date and notify us of any changes thereto.

9. KEEPING OF RECORDS

- 9.1. Information and records of a personal nature of our clients and employees shall be stored for a period of 5 (five) years before being destroyed and/or deleted.
- 9.2. Before destroying and/or deleting any such information or records, we shall first approach our client or former employee in order to confirm whether they would like us to hand said information or records to them. Should they not want to keep any such information or records, we will proceed to destroy and/or delete the information or records.

10. SECURITY OF PERSONAL DATA

Trive SA will take reasonable precautions to protect Personal Data from any loss, misuse, unauthorized access, disclosure, alteration and destruction.

11. TRANSFER OF PERSONAL DATA

Subject to this Policy, we may from time-to-time transfer Personal Data within and between various worldwide locations for general business purposes, in compliance with the applicable regulations of the country of origin and this Policy.

12. ACCOUNTABILITY

- 12.1. The Company expects its associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide Personal Information to the Company.

12.2. The Company may periodically audit privacy compliance and, where necessary, will extend by contract its privacy policies and data protection practices to the Company's suppliers and partner relationships.

13. ENFORCEMENT

Trive SA uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the applicable Principles. We hereby encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding the use and disclosure of Personal Data in accordance with such Principles.

14. PRIVACY STATEMENT CHANGES

If our information practices change in a significant way, we will post the policy changes here. Trive SA reserves the right to change this Privacy Statement at any time by posting an updated version here. All previous versions will not be valid.

Client/Employee Signature	
Date	