

EAZI ACCESS DATA PRIVACY POLICY

1. INTRODUCTION

- 1.1. Eazi Access is committed to safeguarding the privacy of our website visitors and users.
- 1.2. This policy applies where Eazi Access are acting as a responsible party with respect to your personal information.
- 1.3. Eazi Access uses cookies on their website. Insofar as these cookies are not strictly necessary for the provision of Eazi Access' website and/or services, Eazi Access will ask you to consent to its use of such cookies when you first visit its website. You may view and access our Cookie Policy on our website.
- 1.4. In this policy, "we"; "us"; "our" and "Eazi Access" refers to Eazi Access Investments (Pty) Ltd (Registration number 2015/309509/07), and any of its subsidiaries or affiliates and/or any other legal entity, joint venture and/or partnership, wherever situated or operating (and irrespective of structure and/or legal nature/regime) that is associated with Eazi Access and which renders services or otherwise conducts business under a name which includes Eazi Access or any variation thereof (including their subsidiaries, parties that are related or inter-related to them and/or their affiliated companies, to the extent applicable) and/or any trust founded by any member of Eazi Access for its own operations and/or any entities that are related and/or inter-related to those trusts, as the case may be, and all such entities' successors-in-title and/or practice, (wherever any such members may be located, including in countries which may not have data-protection laws similar to those of South Africa in which your personal information was collected) for as long as they remain associated with Eazi Access.
- 1.5. Where use of the website is subject to the Protection of Personal Information Act of 2013 ("POPIA") or where any references to POPIA are made in terms of this Disclaimer, then conformance with the Act shall be limited to the Eazi Access South African Registered Companies or otherwise as determined by POPIA.

2. PURPOSE

- 2.1. The purpose of this data privacy policy is to articulate Eazi Access's commitment to safeguarding the personal information it collects, processes, and stores. This policy outlines the principles, practices, and procedures governing the handling of personal information, as well as special/sensitive personal information, ensuring transparency and accountability to individuals whose information is being processed.
- 2.2. This policy further informs users about the types of personal information collected, the purposes for which it is used, and the measures in place to protect it.
- 2.3. This policy documents the manner in which Eazi Access ensures compliance with the terms and conditions set out in POPIA, by fostering a responsible and ethical approach to personal information handling throughout the entire lifecycle.
- 2.4. Eazi Access respects your privacy and is committed to protecting your personal information as defined in POPIA.

3. APPLICATION OF THIS PRIVACY POLICY

- 3.1. This privacy policy applies to the personal information processed by Eazi Access which include personal information relating to identifiable, living natural persons and identifiable, existing, juristic persons in connection with:



- 3.1.1. our website <https://www.eazi.co.za/>
 - 3.1.2. our social media properties;
 - 3.1.3. our events, marketing, and business development activities;
 - 3.1.4. our business communications and other online and offline business interactions;
 - 3.1.5. our services;
 - 3.1.6. our CCTV cameras at our business locations;
 - 3.1.7. our subscription to the Eazi Access's services, publications, or marketing database;
 - 3.1.8. third party service providers, including analytics, advertising networks, search information, technical, payment and delivery services providers;
 - 3.1.9. publicly available sources;
 - 3.1.10. request/s for tenders, quotations, proposals, and the like made by or to us;
 - 3.1.11. the supply of products and services to us.
- 3.2. This privacy policy does not apply to the personal information that we collect about employees and other personnel, contractors, or applicants and candidates.

4. HOW TO CONTACT OUR INFORMATION OFFICER

- 4.1. Eazi Access has an information officer who oversees our data protection compliance.
- 4.2. You can contact our information officer at:

Name: Christiaan Kruger

Telephone Number: 087 086 5021

Email: informationofficer@eazi.co.za

5. DEFINITIONS

- 5.1. Application - a program or service operated by Eazi Access (or on our behalf) that may be displayed on various online, mobile, or other platforms and environments, including those operated by third parties, which permits Eazi Access to interact directly with our users.
- 5.2. Children - refers to individuals under 18 years of age.
- 5.3. Responsible Party - is Eazi Access Investments (Pty) Ltd (Registration number 2015/309509/07), and any of its subsidiaries or affiliates that is responsible for the personal information collected.
- 5.4. Operator - is a person or entity that processes personal information on behalf of Eazi Access and is permitted to perform data processing only as directed by Eazi Access.
- 5.5. IP Address - is associated with the access point through which you enter the Internet and is typically controlled by your Internet Service Provider (ISP) or your company. Eazi Access may use IP addresses to collect information regarding the frequency with which users visit various parts of its sites and applications, and Eazi Access may combine IP addresses with personal information.
- 5.6. Parents - means a parent or legal guardian.
- 5.7. Personal Information - means information that identifies (whether directly or indirectly) a particular individual and/or a juristic person, such as the name, postal address, email address, and telephone number.
- 5.8. Public Forums - Eazi Access' applications may offer message boards, conversation pages, blogs, chat rooms, social community environments, profile pages, and other forums that do not have a restricted audience. If you provide personal information when you use any



of these platforms, such personal information may be publicly posted and otherwise disclosed without limitation as to its use by Eazi Access or by a third party.

6. PRIVACY AND SECURITY

- 6.1. Eazi Access have implemented reasonable technical and organisational measures to keep personal information secure and in compliance with POPIA.
- 6.2. You indemnify and hold Eazi Access harmless from any loss, damages, or injury that you may incur as a result of:
 - 6.2.1. any security compromise of personal information to unauthorised persons; or
 - 6.2.2. your acts or omissions during the provision of personal information to Eazi Access.

7. PERSONAL INFORMATION WHICH EAZI ACCESS MAY COLLECT

- 7.1. Eazi Access may collect the following personal information:
 - 7.1.1. name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title, financial records and employment history, and family details, including their relationship to you;
 - 7.1.2. identification numbers issued by government bodies or agencies, such as your identity number, passport number, tax identification number and driving license number and company registration number;
 - 7.1.3. demographic information such as your address, preferences, and interests;
 - 7.1.4. name, address (including proof of address), other contact details (e.g. email and telephone numbers) of juristic persons;
 - 7.1.5. information relevant to the provision of our products and services;
 - 7.1.6. information relevant to the procurement of products and services from suppliers;
 - 7.1.7. bank account or payment card details, income, or other financial information;
 - 7.1.8. information that you provide to us as part of us providing products and services to you;
 - 7.1.9. special or sensitive/special personal information as defined in POPIA, including information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric information; information about your sex life;
 - 7.1.10. relevant information as required by applicable laws, including anti-money laundering legislation and as part of our client onboarding procedures, including evidence of source of funds;
 - 7.1.11. information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs;
 - 7.1.12. still and video images captured by CCTV at our offices. We use CCTV to help provide a safe and secure environment and you may be recorded when you visit our offices. Further information can be found in our CCTV Privacy Policy, available upon request;
 - 7.1.13. identity data, contact data and special personal information from publicly available sources or third parties, service providers and the like who conduct screening on any member of the Eazi Access's clients or vendors for anti-money laundering purposes, or third parties with whom any member of the Eazi Access hosts events.



8. QUALITY OF INFORMATION

- 8.1. Eazi Access is obliged to keep personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

9. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

- 9.1. Eazi Access may process the personal information it collects for a number of lawful purposes including but not limited to:
- 9.1.1. to register you as a client of Eazi Access;
 - 9.1.2. registration information - information you provide us with when you request information or a quote, create an account, enter a promotion, or link your profile to a third-party site or platform with your registration accounts, such as your first name and surname, company, city and country of residence or work, gender, date of birth, email address, phone number(s) username, and password;
 - 9.1.3. transaction information - information you provide us with when you request more information, contact, or purchase a product or service from Eazi Access, such as your postal address, order, and payment information;
 - 9.1.4. information you provide in public forums on our sites and applications, such as your public posts;
 - 9.1.5. information sent either one-to-one or within a limited group using Eazi Access' message, chat, post, or similar functionalities, where Eazi Access are permitted by the applicable law to collect this information;
 - 9.1.6. information Eazi Access obtains from a third party, such as a site or platform provider, about the use of our applications on third-party platforms or devices;
 - 9.1.7. location information - information provided by a mobile device or other device interacting with one of our sites or applications (including through beacon technologies), or associated with your IP address, where Eazi Access are permitted by law to process this information;
 - 9.1.8. activity information about your use, and the use by any person(s) you authorise through your account, of our sites and applications, such as the content you view or post, how often you use Eazi Access services, and your preferences;
 - 9.1.9. and use or view device data when you visit Eazi Access' sites, use our applications on third-party sites or platforms, or open emails Eazi Access send, including your browser or unique device identifier, and IP addresses.
 - 9.1.10. to provide you with any other services, products, or offerings that you may have requested or otherwise consented to, or which may be ancillary thereto, or associated therewith, and to notify you about changes to such services, products, or offerings;
 - 9.1.11. to manage marketing preferences;
 - 9.1.12. to manage the Eazi Access's relationship with you which may include:
 - 9.1.12.1. notifying you about changes to the Eazi Access's terms (including to this policy);
 - 9.1.12.2. asking you to leave a review or take a survey;
 - 9.1.12.3. assessing and dealing with complaints and requests;
 - 9.1.12.4. managing payments, fees, charges, and accounts (including collecting and recovering money owed to any member of the Eazi Access);



- 9.1.13. to keep any work product or other documentation (including but not limited to agreements and other documents drafted by Eazi Access and/or other documents received as part of the Eazi Access's internal know-how;
- 9.1.14. to verify your identity or the identity of your beneficial owners;
- 9.1.15. to comply with lawful requests for information received from local or foreign law enforcement, government, and tax collection agencies;
- 9.1.16. to comply with measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination;
- 9.1.17. to monitor, keep record of and have access to all forms of correspondence or communications received by or sent from any member of Eazi Access or any of its employees, agents, or contractors, including monitoring, recording, and using as evidence, where applicable, all telephone and online communication software communications between us and you;
- 9.1.18. to detect and prevent fraud and money laundering and/or in the interest of security and crime prevention;
- 9.1.19. to administer and protect Eazi Access's business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- 9.1.20. for operational, marketing, auditing, legal and record keeping requirements;
- 9.1.21. to conduct market research and provide you with information about Eazi Access's products or services from time to time via email, telephone, or other means;
- 9.1.22. to deliver relevant website content and newsletters and other information to you (which may include direct marketing material);
- 9.1.23. to use data analytics to improve the Eazi Access's website, products/services, newsletters, customer relationships and experiences;
- 9.1.24. to make suggestions and recommendations to you about goods or services that may be of interest to you;
- 9.1.25. to disclose personal information to third parties for reasons set out in this policy or where it is not unlawful to do so;
- 9.1.26. to improve or evaluate the effectiveness of any member of Eazi Access's business or products, services, or offerings;
- 9.1.27. for submissions to awards and rankings agencies;
- 9.1.28. for purposes of material aimed to promote Eazi Access;
- 9.1.29. to prevent and control any disease;
- 9.1.30. where you have unsubscribed from certain direct marketing communications, to take steps to implement your instruction;
- 9.1.31. to procure goods and services;
- 9.1.32. to respond to requests for quotations and tenders.

10. DIRECT MARKETING

- 10.1. You have the right to object to receiving direct marketing (opt out) at any time by unsubscribing by emailing marketing@eazi.co.za or informationofficer@eazi.co.za.

11. DISCLOSURE OF PERSONAL INFORMATION

Eazi Access may share personal information with the parties set out below for the purposes set out in this policy:



11.1. Internal third parties

11.1.1. The members of Eazi Access share personal information with other members within Eazi Access. This may involve transferring personal information outside the country where the Eazi Access has collected that personal information, to entities in countries which may not have data protection laws which are similar to those of the country where the personal information was collected.

11.2. External Third Parties

11.2.1. Eazi Access may, as we may deem necessary for any one or more of the purposes set out in this policy or other lawful purposes, transfer personal information to third parties or service providers, including to service providers in countries which may not have data protection laws which are similar to those of the country where the personal information was collected, including to:

- 11.2.1.1. service providers acting as operators or responsible parties who provide information technology and system administration services;
- 11.2.1.2. professional advisors acting as operators or responsible parties, including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, accounting, and other services;
- 11.2.1.3. service providers and the like who conduct screening on any member of Eazi Access' clients (or their beneficial owners) or suppliers for anti-money laundering purposes;
- 11.2.1.4. regulators and other authorities if Eazi Access is legally obliged to do so, or if instructed by you to do so, for purposes of preventing, detecting, and reporting fraud and criminal activities, the identifying of the proceeds of unlawful activities and the combatting of crime;
- 11.2.1.5. any person if any member of Eazi Access is under a duty to disclose or share personal information in order to comply with any applicable laws, or to protect the rights, property, or safety of Eazi Access, other clients or other third parties, or the reputation of Eazi Access;
- 11.2.1.6. your agent or any other person acting on your behalf;
- 11.2.1.7. tracing agents, sheriffs, and the like;
- 11.2.1.8. various awards and rankings agencies;
- 11.2.1.9. clients and prospective clients for purposes of rendering services, proposals, quotations, tenders, and the like; and
- 11.2.1.10. a third party/parties whom Eazi Access may choose to sell, transfer or merge parts of Eazi Access's business or assets. Alternatively, Eazi Access may seek to acquire other businesses or merge with them. If a change happens to Eazi Access' business, then the new owners may use personal information in the same way as set out in this policy.

12. TRANSBORDER TRANSFERS

12.1. The nature of our business means that your personal information may be transferred across national boundaries, including, potentially, to countries that do not have similar data protection laws to those where the personal information was collected.

12.2. If we transfer your personal information across national boundaries, we will effect those transfers in compliance with applicable data protection laws.



13. ACCESS TO, CORRECTION AND DELETION OF PERSONAL INFORMATION

- 13.1. Under POPIA, you have the rights set out below in relation to your personal information which Eazi Access holds.
- 13.1.1. Right to access personal information (commonly known as a "Data Subject access request"), including the right to receive a copy of the personal information.
 - 13.1.2. Right to correct any incomplete or inaccurate personal information.
 - 13.1.3. Right to request erasure of personal information if Eazi Access is not authorised to process the personal information.
 - 13.1.4. Right to object to processing of personal information, if Eazi Access is relying on its legitimate interest (or those of a third party) to process the personal information, but as a result of your particular situation such processing impacts on your fundamental rights and freedoms.
 - 13.1.5. Right to request restriction of processing of personal information whilst a complaint is being investigated.
 - 13.1.6. Right to withdraw consent at any time if Eazi Access is relying on consent to process personal information. If you withdraw your consent, Eazi Access may not be able to provide certain products or services to you. This will be considered on a case-by-case basis.

14. ELECTRONIC AND WEBSITE LINKS

- 14.1. The Eazi Access' website, newsletters and/or events marketing pages may include links to third party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your personal information.
- 14.2. Eazi Access does not control these third party websites and is not responsible for their privacy policies. When you leave the Eazi Access' website, we encourage you to read all applicable privacy policies.

15. COMPLAINTS

- 15.1. If you are not satisfied with Eazi Access' use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, you are encouraged to contact our Information Officer at the contact details set out above. Should you remain dissatisfied, then you have the right to complain to the Information Regulator that supervises our processing of your personal information.
- 15.2. The Information Regulator is the competent authority to deal with complaints and claims in relation to non-compliance with the personal information protection requirements under POPIA. The Information Regulator's contact details are available at <https://www.justice.gov.za/infoereg/contact.html>

16. OUR DETAILS

- 16.1. Our website is owned and operated by Eazi Access.
- 16.2. Eazi Access Investments (Pty) Ltd is registered in South Africa under registration number 2015/309509/07 with registered offices and principal place of business is at Allandale Offices, 23 Magwa Crescent, Waterfall City, 2090.
- 16.3. You Can Contact Us By:
- 16.3.1. post to, Postnet Suite 265, Private Bag X121, Halfway House, 1685
 - 16.3.2. telephone on, 086 100 3294



16.3.3. email on, info@eazi.co.za

17. LATEST VERSION

- 17.1. Eazi Access keeps this policy under regular review and may amend this policy from time to time.
- 17.2. Any such amendment will come into effect when published on the Eazi Access website and become part of any agreement that you have with Eazi Access.
- 17.3. You must ensure that you obtain the latest version of this policy before any action is taken based hereon. It is your responsibility to check the Eazi Access website often.

Date of last review: 02 February 2024

