

Digital Wedge Technologies (Digiwedge) is committed to protecting your privacy. There are various ways that you might interact with our platform, and the information you provide when doing so allows us to improve our services.

This Privacy Policy applies to Finant No. 24 (Pty) Ltd t/a Digital Wedge Technologies (Digiwedge) and covers our processing activities as a data controller.

This website, our related websites and any mobile site or mobile application that link to this Privacy Policy (collectively, the “Site”, “Sites”) are owned and operated by Finant No. 24 (Pty) Ltd t/a Digital Wedge Technologies with its principal place of business at Block B Pavilion Office Park, 12 Wessel Rd, Rivonia, Johannesburg, Gauteng, Republic of South Africa.

Our privacy policy explains:

- What information we collect, and why we collect it;
- How we use that information;
- How we protect that information;
- How you can control your information, including accessing, updating and deleting what we store; and
- How we share information collected.

Contents

1. Information we collect
2. How We Use Information
3. Updating Your Information and Opting Out

4. Digiwedge as Data Processor
5. Disclosure of Your Personal Data to Third Parties
6. International Transfers
7. Security of Your Personal Data
8. Data Retention: How Long We Keep Your Personal Data
9. Your Rights
10. Use of Cookies, IP Addresses and Aggregate Information
11. Links to Third Party Websites and Third Party Applications
12. Age
13. Complaints
14. Contacting Us
15. Changes to This Policy

1. Information we collect

Information Voluntarily Provided

We may collect or record basic personal information which you voluntarily provide through completing forms on our Site, from our Client (of which you are a member), through questions you send to us, or through other means of communication between you and us. The categories of personal information you provide may include:

- first and last name;
- email address;
- phone number
- mailing address;
- password to register with us;
- Date of Birth (optional)
- Membership # at your registered Club

- Gender (optional)
- Title
- Membership numbers or other affiliation, reciprocal, loyalty system identifiers used for membership verification
- any other identifier that permits us to make contact with you.

Information from Site Visits

We collect, store and use information about your visits to the Sites and about your computer, tablet, mobile or other device through which you access the Sites. This includes the following information:

- technical information, including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location;
- information about your visits and use of the Site, including the full Uniform Resource Locators (URL), clickstream to, through and from our Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and Site navigation and search terms used.

2. How We Use Information

As a data controller, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Purposes for which we will process the information	Legal Basis for the processing
To provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To personalize our services and the Sites to you.	It is in our legitimate interests to improve the Site in order to enhance your experience on our Site, to facilitate system administration and better our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To update you on services and products and benefits we offer.	It is in our legitimate interests to market our services and products. We consider this use to be proportionate and will not be prejudicial or detrimental to you. For direct marketing sent by email to new contacts (i.e. individuals who we have not previously engaged with), we need your consent to send you unsolicited direct marketing.
To send you information regarding changes to our policies, other terms and conditions and other administrative information.	It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
To administer our Sites including troubleshooting, data analysis, testing, research, statistical and survey purposes; To improve our Sites to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the Sites; and to keep our Sites safe and secure.	For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the Sites and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
To measure or understand the effectiveness of any marketing we	It is in our legitimate interests to continually improve our offering and to develop our business. We consider this use to be necessary in order to

Purposes for which we will process the information	Legal Basis for the processing
provide to you and others, and to deliver relevant marketing to you.	effectively generate business and will not be prejudicial or detrimental to you.
To enforce the terms and conditions and any contracts entered into with you.	It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.

If you do not wish to provide us with your personal data and processing such data is necessary for the provision of our services to you and to fulfil our contractual obligations with our Client, we may not be able to provide our services to you or perform our obligations under the contract between us and our Client. Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal.

3. Updating Your Information and Opting Out

To review, correct, update, delete, object or otherwise limit our use of your personal information that has been provided to us, or request portability and/or details of your personal information that is held by us, please contact us using the contact information listed below in the “Contacting Us” section and clearly describe your request.

If you have registered for an account with us, you can help to ensure that your personal information is accurate and up to date by logging into your account.

You may unsubscribe from marketing communications at any time by clicking the “Unsubscribe” button available at the bottom of any electronic communication we may send to you. You may also unsubscribe from any

medium of communication by contacting us using the information set out in the “Contacting Us” section below.

4. Digiwedge as Data Processor

In certain cases, we also operate as a data processor and we collect and process personal information on behalf of our Client in the provision of our services. In these circumstances, Digiwedge is acting as a data processor and our Client remains the data controller in respect of personal information they provide to us.

Our Client remains the data controllers with respect to any personal information that they provide to us for the provision of our services. To the extent that we are acting as data processor, we therefore act in accordance with the instructions of our Client regarding the collection, processing, storage, deletion and transfer of personal information, as well as other matters such as the provision of access to and rectification of personal information. We will only use such personal information for the purposes of providing the services for which our Client has engaged us.

Our Client is responsible for ensuring that your privacy is respected, including communicating to you in their own privacy policies who their personal information is being shared with and processed by. Where Digiwedge is acting as a data processor, we will refer any request from you for access to personal information which we hold about them to our Client. We will not respond directly to the request.

As a data processor, we may share personal information where instructed by our Client. Where authorized by the Client, we may also share personal information with third party service providers who work for us and who are subject to security and confidentiality obligations.

5. Disclosure of Your Personal Data to Third Parties

We may share your personal information with our affiliates, subsidiaries or contractors as necessary to carry out the purposes for which the information was supplied or collected (i.e. to provide the services you have requested from us). Personal information will also be shared with our third party service providers and business partners who assist with the running of the Sites and our services and products including hosting providers, email service providers and payment processing partners. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, we may disclose information about you when we believe that such use or disclosure is reasonably necessary to: comply with any legal or regulatory obligation; establish, exercise or defend the rights of Digiwedge, our staff, customers or others; and protect our rights, property or safety, or the rights, property or safety of our users, or others.

6. International Transfers

If you are based in the EU or EEA

We may share your personal data outside the European Economic Area (EEA) to Digiwedge's affiliates and third party service providers internationally, including but not limited to, South Africa. Whenever we transfer your personal data outside the EEA to the countries identified above which have not been deemed by the EU to have an adequate level of protection for personal data, and specifically to the US, we ensure a similar degree of protection is afforded to it by using standard data protection clauses approved by the European Commission (as permitted under Article 46(2)(c)) that are designed to help safeguard your privacy rights.

7. Security of Your Personal Data

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. We use appropriate measures to safeguard personally identifiable information, which measures are appropriate to the type of information maintained, and follow applicable laws regarding the safeguarding of any such information under our control. No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, we cannot guarantee the absolute security of your information. The Internet by its nature is a public forum, and we encourage you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

8. Data Retention: How Long We Keep Your Personal Data

We will retain personal information which we process on behalf of our Client for as long as needed to provide services to you and in accordance with any agreement in place with you. When you contact us, we may keep a record of your communication to help solve any issues that you might be facing. Your information may be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement.

9. Your Rights

You may request from us access to, correction of, blocking of and/or deletion of your personal data in line with applicable data protection law. You may also withdraw your consent for us to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Where your personal data is processed by us with your consent

or for the performance of a contract by automated means, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format upon request.

Responding to Requests

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. Also, please note that we may refuse a request for blocking and/or deletion where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.

10. Use of Cookies, IP Addresses and Aggregate Information

We may collect data in connection with your use of our Sites using small files commonly known as “cookies”. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the Sites and is stored on your device’s browser or hard drive. We may also collect data that your browser sends to us, such as your IP address, browser type, location, language, access time and referring website addresses. Such data may be used to analyze trends, to administer the Site, to track your movements around the Site and to gather demographic

data about our visitor base as a whole. The data gathered by these cookies is in the form of aggregated anonymous data.

By continuing to browse the Sites, you are agreeing to our use of cookies.

If you don't want us to use cookies when you use the Sites, you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. However, if you block cookies some of the features on the Sites may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

We currently use the following cookies:

Category	Name	Use
Strictly necessary cookies	<ul style="list-style-type: none">• cookieconsent_status• _gid• __gat_UA-87771226-4• _ga• __RequestVerificationToken• 1P_JAR• .AspNet.ApplicationCookie• Vidyad• gswitchmobile• gismobile	These cookies are necessary to offer the basic functionalities of our Sites, to deliver the services the users have requested, and to remember a user's cookie settings.

Category	Name	Use
	<ul style="list-style-type: none"> • Form_Submit • Last_Entered_User2 • Survey_Submit • OrganizationId • SUG_1 • LanguageCode • ASP.NET_SessionId • ss-id • ss-pid • LoginExpiration • LoginToken • SMUAuth 	
Performance cookies	<ul style="list-style-type: none"> • AdRoll • SalesFusion • Act-On 	These cookies collect anonymous data on the pages visited and determine devices used by the user.
Functionality cookies	<ul style="list-style-type: none"> • mrm-edit-mode • mrm-dark-theme • Login_Key • Pardot • SalesFusion 	These cookies remember choices made by the user to improve the user's experience and to provide enhanced, more personalized features.

Category	Name	Use
	<ul style="list-style-type: none"> • Act-On • Unbounce • Perfect Audience 	
Analytic cookies	<ul style="list-style-type: none"> • Google Analytics • Hub Spot • AdRoll • Lucky Orange • SMUTrack • ChartBeat 	<p>These cookies collect data to help us understand how our visitors use the Sites and how we can improve the Sites.</p>
Third-party targeting and advertising cookies, including social media sharing	<ul style="list-style-type: none"> • Facebook • Twitter • Instagram • Magentrix • Pardot • Doubleclick • AddThis.com 	<p>These cookies collect data about the user's browsing habits in order to provide advertising relevant to the user's interests.</p>
Architecture cookies	<ul style="list-style-type: none"> • Amazon AWSALB • Cloudflare • Facebook 	<p>Third party cookies used for load balancing, caching, content management, and third party authentication.</p>

Category	Name	Use
	<ul style="list-style-type: none"> <li data-bbox="644 322 791 353">• Twitter <li data-bbox="644 403 788 434">• Yahoo <li data-bbox="644 483 794 515">• Google 	

We are obliged by Google Analytics to state the following:

The Sites' use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the Sites analyze how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

IP Addresses and Aggregate Information

An Internet Protocol ("IP") address is associated with your computer's connection to the internet. We may use your IP address to help diagnose problems with our server, to administer the Site and to maintain contact with you as you navigate through the Site. Your computer's IP address also may be used to provide you with information based upon your navigation through the Site. Aggregate information is used to measure the visitors' interest in, and use of, various areas of the Site and the various programs that we

administer. We will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, we may undertake statistical and other summary analyses of the visitors' behaviours and characteristics. Although we may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

11. Links to Third Party Websites and Third Party Applications

Our Sites may contain links to third party websites. These third party websites are operated by companies that are outside of our control, and your activities at those third party websites will be governed by the policies and practices of those third parties. Digiwedge does not in any way endorse or make any representations about such third-party websites and applications. As such, Digiwedge is not responsible for the privacy practices or content of such third-party websites and applications that are subject to their own privacy policies. If you choose to access such links, we encourage you to review all third-party site privacy policies before submitting any of your data.

12. Age

We do not sell our services to children and the Site is not intended for or directed at children under the age of 13 years. As such, our Sites are designed for adult user interaction. We do not intentionally collect personally identifiable information from children under the age of 13. If you believe that we may have collected personal information from someone under the age of 13 (or the applicable age of consent) without proper consent, please let us know using the methods described in this policy.

13. Complaints

If we receive formal written requests or complaints, we will follow up with the party making the request or complaint. To the extent permitted by applicable

law, where we would not properly address properly your request, you have the right to lodge a complaint with the competent data protection authority in your locality (for example, in the UK, the supervisory authority would be the Information Commissioner's Office).

14. Contacting Us

We have appointed a Data Protection Contact who you can reach out to about any queries you may have in relation to this Privacy Policy. If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us as follows:

Name: Graham Leach

Address: Block B Pavilion Office Park, 12 Wessel Rd, Rivonia, Johannesburg, Gauteng, Republic of South Africa.

Email: operations@digiwedge.com

Phone No: +27 (0) 10-035-0644

15. Changes to This Policy

We regularly review our compliance with our privacy policy. We also adhere to several self-regulatory frameworks in addition to complying with applicable law.

We may change this privacy policy from time to time. If this privacy policy changes, the revised privacy policy will be posted at the "Privacy Policy" link on the Site's home page. In the event that the change is significant or material, we will notify you of such a change by revising the link on the home page to read "Newly Revised Privacy Policy." Please check the privacy policy frequently. Your continued use of the Site constitutes acceptance of such changes in the privacy policy, except where further steps are required by applicable law. This privacy policy was last updated on the date set out at the end of the policy.

LAST UPDATED: 28 January 2021