

PRIVACY POLICY

FOR FREI ONE DIGITAL (PTY) LTD

Your data privacy is of the highest importance to FREI. Please see our privacy policy below.

1. INTRODUCTION

FREI ONE DIGITAL (PTY) LTD ("FREI") is part of the Tradeswitch Group. FREI is registered and operates in the Republic of South Africa. FREI is fully compliant with the Protection of Personal Information Act No. 4 of 2013 ("POPIA") and acts as both a responsible party and an operator on behalf of data subjects that FREI performs processing for. FREI is committed to compliance with all relevant South African laws in respect of personal data, and the protection of the "rights and freedoms" of individuals whose information FREI collects and processes in accordance with POPIA.

This Data Privacy Policy Notice is intended to provide transparency and clarity to data subjects about what happens with their personal data.

POPIA applies to the processing of personal data wholly or partly by automated means (i.e. by computer) and to the processing other than by automated means of personal data (i.e. paper records) that form part of a filing system or are intended to form part of a filing system.

POPIA applies to the processing of all personal information for a responsible party where the responsible party is domiciled in the Republic of South Africa or not domiciled in South Africa, but makes use of automated or non-automated means in South Africa, unless those means are used only to forward personal information through South Africa. FREI qualifies under all these categories. FREI qualifies in some instances as a responsible party and in some instances as an operator.

2. WHICH PERSONAL DATA ARE COLLECTED AND PROCESSED

FREI endorses and adheres to the POPIA principal of 'minimality' whereby FREI only collects, processes, or stores the minimum amount of data that it requires to provide the requested service.

Different data is required at different points of the service provided by FREI and is not all collected at the same time.

Depending on the service provided, this can include any or all the following data:

- Name, address and ID number;
- Personal Information such as person's educational and / or employment history;
- Financial details such as earnings;
- Views or opinions of another;

- Special Personal Biometric Information such as one's blood type and fingerprints;
- Special Personal Information such as person's information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person.

In certain cases, FREI may require additional information for either the service provided or any other legitimate reason. In these instances, FREI will always seek consent from the data subject, together with an explanation of why the additional information is necessary.

3. LEGAL BASIS FOR OBTAINING OR REQUESTING PERSONAL INFORMATION

FREI requests personal information in its capacity as a responsible party and obtains personal information from responsible parties for processing purposes in its capacity as an operator.

The legal basis for collecting personal information is primarily as follows:

- based on consent received from a data subject and on a legitimate business need to provide the data subject with the service requested;
- where FREI is under legal obligation to collect personal information;
- in order to protect the legitimate interests of the data subject;
- where processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- where processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.

4. PURPOSE FOR WHICH WE COLLECT PERSONAL INFORMATION

FREI is a responsible party and operator under POPIA.

FREI uses personal information in a number of different ways, including but not limited to:

- providing the services requested by the data subject;
- providing the data subject or the responsible party with customer support inquiries;
- providing data subjects with information on products;
- for analyses of information to establish user trends and needs;
- to communicate with the data subject on changes to services, policies, terms and conditions or other important information.

5. SECURITY & QUALITY OF PERSONAL DATA

FREI protects and secures all data in line with PCI-DSS compliance.

FREI aims at the highest standards of quality data processing, in line with best practice based on PCI-DSS Compliance.

FREI records all personal information in line with its data protection impact assessment and data inventory policies. These policies are reviewed and updated at least annually.

FREI in compliance with relevant law, employ the necessary technical and organisational security measures to protect your Personal Information in our possession from accidental or unlawful destruction, loss, modification, unauthorised disclosure, and unauthorised access. Information is stored on secure computers in a closed and accredited data centre, and data is encrypted whenever possible. Furthermore, we check our security policies and processes on a regular basis to guarantee that our systems are secure and protected.

If FREI has reasonable grounds to believe that your personal information in our possession has been compromised, accessed or acquired by an unauthorised user, we will notify the relevant regulator and you, unless a public body or the relevant regulator informs us that notifying you will hinder a criminal investigation. Where FREI has reasonable doubts concerning the identity of the natural person making a request, FREI may request the provision of additional information necessary to confirm the identity of the data subject.

6. DATA SUBJECT RIGHTS

In accordance with POPIA, data subjects are provided with the following rights by FREI:

1. **Right to be notified** that personal information about him, her or it is being collected or his, her or its personal information has been accessed or acquired by an unauthorised person;
2. **Right to request access** to his, her or its personal information and to establish whether a responsible party holds personal information of that data subject;
3. **Right to request** the correction, destruction or deletion of his, her or its personal information;
4. **Right to object**, on reasonable grounds relating to his, her or its particular situation to the processing of his, her or its personal information; as well as to object at any time to the processing of personal information for purposes of direct marketing; Data subject(s) needs to complete Form 1 and email it to the Information Officer with the following email address: dataprotection@frei.one
5. **Right not to be subject to a decision based solely on the basis of the automated processing** of his, her or its personal information intended to provide a profile of such person;
6. **Right to submit** a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator; and
7. **Right to institute civil proceedings** regarding the alleged interference with the protection of his, her or its personal information.

7. RETENTION OF PERSONAL AND OTHER DATA

FREI retains personal and processing data in line with PCI-DSS standards. All data that is required to be retained for compliance, legal, archiving, client support or ongoing processing is retained for only as long as is absolutely required and in line with PCI-DSS compliance, where after it is erased and disposed of.

8. CONSENT

By the Data Subject providing consent, and being advised about this privacy policy, they are giving FREI permission to process personal data specifically for the purpose of the requested service.

Consent is required by FREI to proceed with the requested service and will be explicitly requested and given.

9. GENERAL INFORMATION

FREI has appointed a board approved Information Officer (acting in the same capacity as an Information Officer required under POPIA) to ensure the enforcement and compliance with POPIA. Any requests, complaints or communications by staff, third parties, service providers, data subject, controllers, processors or the data security authority should be directed to the following email: dataprotection@frei.one

FREI as a responsible party and operator, its staff, third parties and service providers are all subject to the appropriate policies, under the control of the Information Officer.

FREI will never sell, share or obtain personal information for any purpose whatsoever, unless it receives the data subject's consent, and that the recipient is POPIA compliant and has the appropriate security facilities in place.

10. COMPLAINTS PROCEDURE

• Scope

1. This procedure addresses complaints from data subject(s) related to the processing of their personal data, FREI's handling of requests from data subjects, and appeals from data subjects on how complaints have been handled.

• Responsibilities

1. All Employees/Staff are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Information Officer.
2. Information Officer is responsible for dealing with all complaints in line with this procedure.

• **Procedure**

1. FREI has the contact details of its Information Officer published on its website, clearly under the 'Contact us' section.
2. FREI has clear guidelines on this page and that enables the data subject to lodge a complaint.
3. FREI clearly provides data subject(s) with this FREI POPIA Data Privacy Policy by publishing it on its website.
4. Data subjects are able to complain to FREI about:
 - a. how their personal data has been processed;
 - b. how their request for access to data has been handled;
 - c. how their complaint has been handled; and
 - d. appeal against any decision made following a complaint.
5. Data subject(s) lodging a complaint with FREI's Information Officer are able to do so by contact form published on the company website, and/or via email direct to the Information Officer as published on the company website.
6. Complaints received via the website contact form are directed to the Information Officer for resolution.
7. Complaints are to be resolved within one month.
8. Appeals on the handling of complaints are to be resolved within one month.
9. If FREI fails to act on a data subject's access request within one month, or refuses the request, it sets out in clear and plain language the reasons it took no action/refusal. FREI will also inform the data subject(s) of their right to complain directly to the supervisory authority. In doing so, FREI provides the data subject(s) with the contact details of the supervisory authority and informs them of their right to seek judicial remedy.

11. REQUEST FOR CHANGE,CORRECTION OR REMOVAL OF INFORMATION:

Please complete form 2 to request a change, correction, or removal of information that we have and send it to dataprotection@frei.one

FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

Note:

2. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
3. If the space provided for is inadequate, submit additional information as an Annexure to this form and sign each page.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E- mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject/designated person

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for is inadequate, submit additional information as an Annexure to this form and sign each page.

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	

INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED:
REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

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Signature of data subject/ designated person