

## Privacy Policy

### Introduction

- We respect your privacy and take the protection of Personal Information very seriously. The purpose of this policy is to describe the way we collect, store, use and protect information that can be associated with a specific natural or juristic person and can be used to identify that person (“Personal Information” or “PI”).
- **Personal Information includes:**
  - Registration information that we collect from you when you register to use our Services (see below);
  - Usage information that we collect from your browser when you use our website (see below); and
  - Service information that we collect when you make use of our Service (see below).
- **Personal Information excludes**
  - information that has been made anonymous so that it does not identify a specific person;
  - permanently de-identified information that does not relate or cannot be traced back to you specifically; and
  - non-personal statistical information collected and compiled by us and information that you have provided voluntarily in an open, public environment or forum including (without limitation) any blog, chat room, community, classifieds or discussion board. As the information has been disclosed in a public forum, it is no longer confidential and does not constitute Personal Information subject to protection under this policy.

### Changes

- We may change the terms of this policy at any time. We will notify you of any changes by placing a notice in a prominent place on the website or by email. If you do not agree with the change you must stop using the services. If you continue to use the services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted such terms.

### Collection

- **Collection on registration.** Once you register with BKB, you will no longer be anonymous to us. This Personal Information will include your email address and unique password selected by you (“Registration information”). In order to provide the Services to you, you will be asked to provide us with additional information on a voluntary basis such as:
  - your title and occupation;
  - your relationship to the company (for example shareholder, member, director, auditor, company secretary, incorporator, employee);
  - a company name, company registration number, the names of its directors or shareholders; their first name, middle name and surname, nationality, ID number (if South African), passport number (if a foreigner), residency (if a foreigner); physical and postal addresses and phone number;
  - practice number (if you are an auditor or attorney) or CIPC customer code (if you have one); and

- o PI to process a credit card payment, including a billing address (“Service information”).
- **Collection from browser.** We automatically receive and record information on our server logs from your browser, such as your Internet Protocol address (“IP Address”), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (“Usage information”).
- Please note that other websites visited before entering our website might place Personal Information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some Personal Information.
- **Cookies.** When you access our website we may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer to collect certain Usage information. We use session cookies (which disappears after you close your browser) and persistent cookies (which remain after you close your browser which can be removed manually) and may be used by your browser on subsequent visits to our website. We use information gathered by cookies to improve the website.
- **Decline to share.** The only way you can decline to share Personal Information with BKB by is not registering with us.
- **Purpose for collection.** We may use any Service information provided by you for such purposes as indicated to you at the time you agree to provide such Service information. We may use your Usage information for the purposes described above and to:
  - o remember your information so that you will not have to re-enter it during your visit or the next time you access the website; and
  - o monitor website usage metrics such as total number of visitors and pages accessed.

### Consent to collection

- We will obtain your consent to collect Personal Information:
  - o In accordance with applicable law; and
  - o At the time you provide us with Registration information.

### Use

- **Messages and updates.** We may send you administrative messages and email updates regarding the website. In some cases, we may also send you a primarily promotional message. You can choose to opt-out of promotional messages.

### Disclosure

- **Sharing.** We may share your information with:
  - o Divisions or subsidiaries of the BKB Group so as to provide joint customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our Services. They will only use this information to send you marketing communications if you have requested their Services;

- o An Affiliate, in which case we will seek to require the Affiliates to honour this Privacy Policy;
- o Our service providers under contract who help with parts of our business operations (payment processing and fraud prevention, marketing, website development and maintenance and other technology services). Our contracts dictate that these service providers only use your PI in connection with the services they perform for us and not for their own benefit;
- o CIPC to process the Services we provide to you;
- o Credit bureaus to verify your identity on registration as provided for in our Terms of Service or as permitted by law; and
- o Third party databases only to verify your identity on registration as provided for in our Terms of Service.
- **No selling.** BKB will not sell your Personal Information. We will not disclose Personal Information to anyone except as provided for in this Privacy Policy.
- **Marketing purposes.** We may disclose aggregate statistics (information about the customer population in general terms) about the PI to advertisers or business partners.
- **Law enforcement.** We may disclose PI if required:
  - o by a subpoena or court order;
  - o to comply with any law;
  - o to protect the safety of any individual or the general public; and
  - o to prevent violation of our Terms of Service, Website Terms of Use and Security Policy.
- **Change of ownership.** If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the PI we processes to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your PI migrating to a new owner, you may request us to delete your PI.
- **Employees.** We may need to disclose Data to our employees that require the employees to do their jobs.

## Security of Data

- We protect your Personal Information in the manner specified in our Security Policy. Generally we use computer safeguards such as firewalls and data encryption to protect Personal Information, and we authorize access to Personal Information only for those employees who require it to fulfil their job responsibilities.

## Retention of Personal Information

- We will only retain your Personal Information for as long as it is necessary to fulfil the purposes mentioned above unless:
  - o retention of the record is required or authorised by law;
  - o you have consented to the retention of the record; or
  - o during the period of retention, we will continue to abide our non-disclosure obligations and will not share or sell your PI.

## Updating or removing

- You can correct or update your PI by notifying us. The correction or update will only apply to future PI.

**Limitation**

- We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of any third party websites.

**Enquiries**

If anyone has any questions or concerns arising from this Privacy Policy or the way in which BKB handles Personal Information, please contact BKB.