

# PRIVACY POLICY

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At Paywell (Pty) Limited, we take your privacy and your trust in us very seriously. This privacy policy provides you with information about how we collect, use and disclose your personal information.

## 1. Overview : Privacy Policy

We respect your privacy and we are committed to protecting the privacy of the users of this website. Paywell (Pty) Limited (also referred to as “we”, “our” and “us” including and/or its relevant subsidiaries and affiliates) want you to be familiar with our privacy policy and has been developed to acknowledge the importance of and assisting in providing a framework for, the appropriate level of protection for consumer identification, collection, holding, using, disseminating, merging, collating, disclosing and protection of your personal information (“process” or “processing”).

This privacy policy applies when you visit or use our websites, software and other services, that refer or link to this privacy policy (each, a "Service"). This privacy policy may be supplemented by additional privacy statements, terms or notices provided to you.

## 2. Information We Collect

We collect information about you in three ways: directly from your input, from third-party sources, and through automated technologies.

### 2.1 Data You Provide to Us :-

The types of personal information that we collect directly from you depends on how you interact with us and the Service, which may include:

- Contact details, such as your name, email address, postal address and phone number;

- Other account registration and profile information, such as job title, educational and professional background and qualifications;
- Comments, feedback and other information you provide to us, including search query data and questions or information you send to customer support; and/or
- Interests and communication preferences, including preferred language.

## 2.2 Data from Your Organization

We may obtain personal information about you from the organization with which you are employed or affiliated in order to activate and manage your access to and use of the organization's subscription to the Service, including:

- Contact details, such as your name and organizational email address, postal address, and phone number;
- Other account registration information such as job title; and/or
- Organizational user ID.

## 2.3 Data from Other Sources

We also may obtain contact details and other information about you from our affiliates and from other third parties, including:

- Businesses with which we offer co-branded services or engage in joint marketing activities; and/or
- Publicly available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

## 2.4 Data from Service Use, Including Cookies

The Service may automatically collect information about how you and your device interact with the Service, including:

- Computer, device and connection information, such as IP address, browser type and version, operating system and other software installed on your device, mobile platform and unique device identifier and other technical identifiers, error reports and performance data; and
- Usage data, such as the features you used, the settings you selected, your URL click stream data, including date and time stamp and referring and exit

pages, search terms you used, and pages you visited or searched for on the Service.

We collect this data through our servers and the use of cookies and other technologies. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. We may use cookies and other technologies to store your preferences and settings, help you with signing in, provide targeted ads and analyse site operations. You can control cookies through your browser's settings and other tools. However, if you block certain cookies, you may not be able to register, login, or access certain parts or make full use of the Service.

### **3. How We Use Your information**

Depending on how you interact with us and the Service, we use your personal information to:

- Provide, activate and manage your access to and use of the Service;
- Process and fulfil a request, order, download, subscription or other transaction;
- Provide technical, product and other support and to help keep the Service working, safe and secure;
- Enhance and improve the Service and our other products, services and to develop new products, services and benefits;
- Offer you customized content and other personalization to make the Service more relevant to your interests and geography;
- Respond to your requests, inquiries, comments and concerns;
- Notify you about changes, updates and other announcements related to the Service and our other products and services;
- Deliver targeted advertisements, promotional messages, notices and other information related to the Service and your interests;
- Provide you with promotional messages and other information about products, events and services of ours, our affiliates and third parties such as sponsors;
- Invite you to participate in user testing and surveys as well as drawings, sweepstakes, competitions and similar promotions;
- Identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns and evaluating our business performance, or in other ways pursuant to a customer agreement; and/or

- Comply with our legal obligations, resolve disputes, and enforce our agreements.

If you are an administrator of an organization with a subscription to the Service, we will use your details to communicate with you about your organisation's subscription and related services. If you supply us contact information of your colleagues, we may contact those individuals with communications about the Service that may include reference to you.

## **4. Sharing of Your Information**

### **4.1 Your Organization**

If you access the Service through a subscription administered by your organization, your personal information and certain usage data gathered through the Service may be accessed by or shared with the administrators authorised by your organization for the purposes of usage analysis, subscription management and compliance, training course progress, performance and remediation, cost attribution and departmental budgeting.

### **4.2 Application Licensor**

If you access a third-party application on the Service through a license agreement with the licensor of that application, personal information relevant that third-party application may be shared with the licensor so that it can provide you access to the application, subject to the terms of its license agreement and privacy policy.

### **4.3 Our Group Companies and Service Providers**

Dependent upon the Services provided, we share information with:

- Our affiliates, trading names and divisions within the Paywell (Pty) Ltd group and certain associated companies that provide technology, customer service and other shared services functions; and/or
- Our service providers, suppliers, agents and representatives, including but not limited to, payment processors, customer support, email service providers, service providers, IT service providers, marketing service providers, research providers, mailing houses and shipping agents;

- To process the information as necessary to provide the Service, complete a transaction or fulfil your request or otherwise on our behalf based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures.

#### 4.4 Your Choices

We may share your personal information with our affiliates and with sponsors, joint venture entities and other third parties, including entities for which we are acting as an agent, licensee, application host or publisher, that wish to send you information about their products and services that may be of interest to you, as determined by your choices in managing your communications preferences and other settings.

#### 4.5 For Legal Reasons

We also will disclose your personal information if we have a good faith belief that such disclosure is necessary to:

- meet any applicable law, regulation, legal process or other legal obligation;
- detect, investigate and help prevent security, fraud or technical issues; and/or
- protect the rights, property or safety of LexisNexis, our users, employees or others; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or merger with another company.

### **5. Grounds for Processing**

When we collect or otherwise process any personal information within the scope of applicable data protection laws, we do so:

- where necessary to provide the Service, fulfil a transaction or otherwise perform a contract with you or at your request prior to entering into a contract;
- where necessary for our compliance with applicable law or other legal obligation;
- where necessary for the performance of a task carried out in the public interest;
- where necessary to enable our customers to comply with their legal obligations;
- where applicable, with your consent; and/or

- where necessary to operate our business, protect the security of our systems, customers and users, detect or prevent fraud, or fulfil our other legitimate interests as described in sections 2-4 above, except where our interests are overridden by your privacy rights.

Where we rely on your consent to process personal information, you have the right to withdraw your consent at any time, and where we rely on legitimate interests, you may have the right to object to our processing.

## **6. Data Retention**

We retain your personal information for as long as necessary to provide the Service and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements.

## **7. Locations of Processing**

Your personal information may be stored and processed by Paywell (Pty) Ltd, its affiliates and their service providers. We take steps, including through contracts and/or agreements, intended to ensure that the information continues to be protected wherever it is located in a manner consistent with the standards of protection required under applicable law.

## **8. Data Security**

We implement technical and organizational measures to seek and to ensure a level of security appropriate to the risk to the personal information we process. We review and update our security measures regularly to improve these security measures and to keep them in line with legal and technological developments. These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information.

## **9. Children's Privacy**

We do not knowingly collect information from children under the age of 18 or target the Service to children under 18.

## **10. Your Communications Preferences**

You can customise and manage your communications preferences and other settings when you register with the Service, by updating your account features and preferences, by using the "opt-out" mechanisms such as "unsubscribe" or other means

provided within the communications that you receive, or by contacting us. We reserve the right to notify you of changes or updates to the Service whenever necessary.

## **11. Accessing and Updating Your Information**

### **11.1 Your Account**

The Service may allow registered users to directly access and review their account information and make corrections or updates upon login at any time. Keeping such information up to date is the responsibility of the user. Registered users may also close their account directly through the Service or by contacting the Service's customer support.

### **11.2 Your Rights**

You may have the right under applicable privacy and data protection laws to request free of charge:

- access to your personal information;
- rectification or erasure of your personal information;
- restriction of our processing of your personal information, or to object to our processing; and
- portability of your personal information.

If you wish to exercise these rights, please submit your request in writing at :

Tel : +27 11 453 8841  
Email: [paywell@iafrica.com](mailto:paywell@iafrica.com)

We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

## **12. Changes**

We will update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Service or by other means.

### 13. Contact

If you have any questions, comments, complaints or requests regarding this privacy policy or our processing of your information, please contact us via :

Tel : +27 11 453 8841  
Email: [paywell@iafrica.com](mailto:paywell@iafrica.com)

You may also lodge a complaint to a data protection authority in the applicable jurisdiction.

Complaints can be lodged in 2 different manners:

1. Verbally, or in writing, by contacting Paywell (Pty) Ltd. After an appropriate internal investigation, we will write to our customers as soon as practicable after a decision has been reached, outlining the decision and the reasons for reaching it.
2. By lodging a complaint to the Regulator completing the form as prescribed which is free of charge if you are a South African resident.

For more information about our processing of personal data as required by applicable local laws, see our website at <https://www.paywell.co.za/>.

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