

# AZUZA PRIVACY POLICY

Version 1.0

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## 1. INTRODUCTION

- 1.1. This Privacy Policy of Azuza Wealth (Pty) Ltd (registration number 2006/021666/07) ("**Azuza**", "**we**" or similar denotations) regulates our right to collect and use certain of your information ("**member**" or "**you**") and your rights in this regard, and applies to your use of the Azuza digital user interface (including the Mobile Applications, Web Application, Hybrid Applications, Website (<https://azuzawealth.com>) , including all Azuza sub-domains), email and/or all digital means of communication and interaction) (collectively the "**Site**") and the services that we offer ("**Services**") through the Site. This Privacy Policy is binding and serves as the agreement between us and you, and will apply as soon as you use the Site and/or Services.
- 1.2. Your use of the Site and/or Services will be regulated by this Privacy Policy as well as any other terms that are available on the Site, including but not limited to, the Terms of Service. If there is a conflict between this Privacy Policy and any of the Terms of Service, the following order of preference will be applied in respect of applying such terms, first the Terms of Service, then this Privacy Policy, as applicable to you.
- 1.3. Unless notice is required in terms of any applicable laws, Azuza may change the content of this Privacy Policy from time to time, in line with any changes that the law or our internal business operations require, without prior notice. We will however, notify you of any material changes to this Privacy Policy. The current version of this Privacy Policy applies each time you visit and/or use the Site and/or Services, and will regulate the relationship between us. It is your responsibility to consider the Privacy Policy each time you visit the Site. Should you disagree with any terms as contained in this Privacy Policy, you must immediately stop using the Site and/or Services.
- 1.4. Your right to privacy and this Privacy Policy, are important to us. Azuza is committed to taking such steps as may be necessary, to protect your privacy

when you use the Site and/or Services, and insodoing, Azuza implements business practices that comply with applicable laws, including the Protection of Personal Information Act, 4 of 2013 ("POPI") and the General Data Protection Regulation ((EU) 2016/679) ("GDPR") (collectively, the "Applicable Law"). In this Privacy Policy, we explain how we will use and protect your Personal Information in light of the Applicable Law.

## **2. PERSONAL INFORMATION**

2.1. "Personal Information" as referred to herein, shall mean personal information as defined in the Applicable Law. Being such information that may be used to directly or indirectly identify you. Personal Information includes, but is not limited to, your name, surname, email address, identity number, contact details, photograph, banking details, location and the like.

## **3. COLLECTING YOUR PERSONAL INFORMATION**

We collect Personal Information about you from the following sources:

- 3.1. directly from you when you use our Site and/or Services, contact us or through the course of our relationship with you (such as when submitting your membership application, investments and the like);
- 3.2. from public sources where you have made your Personal Information public, such as social media;
- 3.3. from your use of the Site or use of any features or resources available on or through the Site; and
- 3.4. from third parties when you interact with them through the Site or your interaction with us as a result of the Services or as required of the third parties to share it with us.

## **4. CATEGORIES OF PERSONAL INFORMATION THAT WE PROCESS**

- 4.1. General personal details: your name and surname, gender, date of birth, age, nationality, language preferences, identity or passport number.
- 4.2. Contact details: your address, contact number, email address, public social media profile(s).

- 4.3. User information: Personal Information included in correspondence, transaction documents, use of the Services or other materials that we process in the course of providing the Services.
- 4.4. Consent records: records of any consents you have given us in respect of using your Personal Information and any related information, such as the specific details of the consent. We will also record any withdrawals or refusals of consent.
- 4.5. Payment information: payment method, payment amount, banking details, date and reason for payment and related information.
- 4.6. Data relating to the Site: such as the type of device you use to access the Site, the operating system and browser, browser settings, IP address, dates and times of connecting to and using the Site and other technical communications information.
- 4.7. Cookies and other similar technologies.
- 4.8. Account details: such as your username, password, usage data, and aggregate statistical information.
- 4.9. Content and advertising data: records of your interactions with our online advertising on the various websites which we advertise and records relating to content displayed on web-pages displayed to you.
- 4.10. Children's Personal Information: We do not knowingly collect Personal Information of any user that qualifies as a "child" in terms of the Applicable law and will act to remove such information from our servers if we become aware of such Personal Information. If you are a parent or guardian and you are aware that your child has provided us with Personal Information without your consent, then please contact us immediately so that we can take the relevant steps to remove such Personal Information from our servers.
- 4.11. Sensitive Information: You can also provide us with information about yourself or third parties that is considered sensitive, such as political opinions, health information or religious beliefs. When you provide such information to us directly, we may seek your consent, where appropriate, to process this information.

While you are under no obligation to provide us with such information, should you choose to withhold such information, we may not be able to provide you with some or all of the Services.

## **5. PURPOSES OF PROCESSING PERSONAL INFORMATION**

5.1. We only process necessary and relevant Personal Information for the following purposes and legal basis:

5.1.1. to perform in terms of the agreement with you (such as providing you with the Services and access to the Site);

5.1.2. operate and manage your membership and interactions with us;

5.1.3. provide members with updated information on their membership, including projects invested in and payments made;

5.1.4. monitor and analyse our business to ensure that it is operating properly, for financial management and for business-development purposes;

5.1.5. contact you by email, SMS, push notifications or other electronic means to inform you about the Services, which includes potential investment opportunities that you may be interested in, unless you have opted out of such communications (direct marketing). Each marketing communication we send you will contain instructions permitting you to "opt out" of receiving future marketing communications. Pursuant to becoming a member and opting-in for such communications, and should you at any time wish not to receive any future marketing communications or have your name deleted from our mailing lists, please contact us at [support@azuzawealth.com](mailto:support@azuzawealth.com) requesting same. If you opt out of receiving marketing communications or other information we think may interest you, we can still send you emails about your membership or any Services you have requested or received from us;

5.1.6. form a view of you as an individual and to identify, develop or improve the Site and Services as applicable to you;

5.1.7. carry out market research and surveys, business and statistical analysis and necessary audits;

5.1.8. fraud prevention;

5.1.9. perform other administrative and operational tasks like testing our processes and systems and ensuring that our security measures are appropriate and acceptable; and

5.1.10. comply with our regulatory, legal or other obligations.

5.2. In addition to the above purposes, we may use your Personal Information for other purposes, should the law allow, if you consent to it, or if it is in the public interest to do so. All purposes for the processing of your Personal Information will be compliant in terms of the Applicable Law.

## **6. DIRECT MARKETING**

6.1. We may process your Personal Information for purposes of contacting you in relation to providing you with information of Services we believe may be of interest to you. Where we provide Services to you (where you are a member of ours), we may send information to you regarding our Services and other information that may be of interest to you, using the contact details that you have provided to us. We will only send you direct marketing communications where you have consented to us sending you direct marketing or otherwise in compliance with the Applicable Laws.

6.2. You may opt out from any direct marketing communications at any time, by clicking on the link that we include in every direct marketing communication, in your membership settings on the Site, or by contacting us and requesting us to do so.

6.3. After you opt out, we will not send you any direct marketing communications, but we will continue to contact you when necessary in connection with providing you with the Services or in connection with our business.

## **7. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

7.1. We will keep your Personal Information confidential and only share it with others in terms of this Privacy Policy and/or the Terms of Service, or if you consent to it, or if the law requires. You agree and consent that we may disclose your Personal Information to:

- 7.1.1. our business partners or related companies, in order to provide you with access to the Site and/or Services, which includes: related companies responsible for the vetting and management of investments (being the startup investments offered on the Site, and in terms of which, members, such as yourself choose to invest into) ("the **Investments**"); and authorised and related companies responsible for the issuing and management of your investment and shares in an Investment, in accordance with the relevant written agreements;
- 7.1.2. our business partners or third party service providers in order to provide you with access to the Site and/or Services, such as data storage service providers, authorised service providers, banking and fund management service providers and/or third party payment processors (as it relates to any funds transferred by or to you in relation to any Investment and the companies they relate to), in accordance with the relevant written agreements;
- 7.1.3. the SPV in charge of the Investment, which you have chosen to invest into and which SPV manages such Investment;
- 7.1.4. legal and regulatory authorities, upon their request, or for the purposes of reporting any breach of the Applicable Law;
- 7.1.5. our professional advisors (such as, accountants, auditors, lawyers and other external professional advisors) in terms of the relevant written agreements with them;
- 7.1.6. any relevant party to the extent necessary for the establishment, exercise or defence of legal rights, criminal offences, threats to public security, and the like;
- 7.1.7. any relevant third party if we sell or transfer all or any portion of our business or assets; and
- 7.1.8. any relevant third party provider where the Site uses third party advertising, plugins or content.

- 7.2. If we engage third party processors to process your Personal Information, the processors will only be appointed in terms of a written agreement which will require the third party processors to only process Personal Information on our written instructions, use appropriate measures to ensure the confidentiality and security of your Personal Information and comply with any other requirements set out in the agreement and required by the Applicable Law.
- 7.3. The Site may connect to various social media websites or apps, including, but not limited to, Whatsapp, Facebook, Twitter, LinkedIn, Instagram. Should you wish to use the Site for social media integration, we will share your Personal Information with the relevant social media websites or apps.

## **8. INFORMATION RELATING TO THIRD PARTIES**

- 8.1. You may elect to provide us with information relating to third parties. For example, should you elect to share the Services with family and/or friends, we request access to information stored in your email and mobile device address books, such as names, email addresses, or phone numbers of your contacts (collectively, "Third-Party Data").
- 8.2. If you use any feature of the Services that allows you to communicate with third parties (such as to refer a third party to the Services, or use the private trade room), either by submitting Third-Party Data to the Services or otherwise permitting the Services to automatically access Third-Party Data in your possession, you acknowledge and agree that you have the authority of the relevant third party for us to access and use the relevant Third-Party Data and that you have notified these third parties and informed them how their information is collected and used by Azuza to provide the Services.
- 8.3. We reserve the right to identify you as the person who has made the referral in any message that is sent to them. We use Third-Party Data to contact such third party using the Third-Party Data provided, and/or provide you with an editable template message designed to facilitate communication between you and such third party through the Services. In addition to sending the foregoing communications, we may also send reminders or related messages to you and to third parties on your behalf from time to time, where permitted by the Applicable Law. In each case, any such communications sent to third parties

using Third-Party Data will provide a means to opt out of receiving further communication of the same nature.

## **9. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

- 9.1. Due to the nature of the Services and our business being established in different countries, we may need to transfer Personal Information to and from the different countries for internal purposes.
- 9.2. We may transfer your Personal Information to recipients in other countries. We will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by the Applicable Law.
- 9.3. Kindly note, that when you transfer any Personal Information directly to a third party in another country (i.e. we do not send your Personal Information to the third party), Azuza is not responsible for that transfer of Personal Information (and such transfer is not based on or protected by this Privacy Policy). Any Personal Information that we receive from a third party country will nevertheless be processed in terms of this Privacy Policy.

## **10. SECURITY**

- 10.1. We have implemented appropriate technical and administrative security measures designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing. These measures are taken in accordance with the Applicable Law.
- 10.2. The internet is an open and often susceptible system and the transfer of information via the internet is not entirely secure. Although we will implement all reasonable measures to protect Personal Information, we cannot guarantee the security of your Personal Information transferred to us using the internet. Therefore, you acknowledge and agree that any transfer of Personal Information by the internet, is at your own risk, and you are responsible for ensuring that any Personal Information that you send to us, is sent securely.



## 11. YOUR RIGHTS

11.1. You have certain specific rights afforded in relation to your Personal Information. Subject to, and except as limited under the Applicable Law, you have the following rights in respect of your Personal Information:

11.1.1. the right to be informed of and request access to the Personal Information that we process about you;

11.1.2. you may request that your Personal Information be amended or updated where it is inaccurate or incomplete. You may send an e-mail to [support@azuzawealthcom](mailto:support@azuzawealthcom) to request such correction;

11.1.3. the right to request that we delete your Personal Information, subject to applicable limitations and exceptions;

11.1.4. the right to request that we temporarily or permanently stop processing your Personal Information;

11.1.5. the right to object to us processing your Personal Information, and to your Personal Information being processed for direct marketing purposes;

11.1.6. the right to request a copy of your Personal Information and request that information to be transmitted for use by another person; and

11.1.7. where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may request that your Personal Information not be processed in that manner.

11.2. Where you have provided consent for us to process your Personal Information, you may also withdraw your consent where our processing is based on your consent. However, we may continue to process your Personal Information should we be legally required to do so for the processing.

## **12. USE OF COOKIES AND SIMILAR TECHNOLOGIES**

- 12.1. When you use the Site, we automatically receive and record information on our server logs from your browser. This information may include, amongst others, your location, IP address, cookie information and Google Analytics information. This is statistical data about browsing actions and patterns. We may also obtain information about your general internet usage through a cookie file which is stored on the hard drive of your computer. Cookies enable us to improve our Site and Services, estimate our public reach and usage patterns, store information about your preferences and recognise when you return to the Site.
- 12.2. In some instances, we collect and store information about your location through cookies (other than when you share your location with us). We convert your IP address or mobile GPS data into a rough geo-location, and we may use location information to improve and personalise the Site and Services for you.
- 12.3. You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy the full use of the Site and/or Services and you may not be able to take advantage of certain investment offers we place on the Site.
- 12.4. Please note that third parties may also use cookies, but we do not have access to, or control over them, and therefore cannot take responsibility for such third parties.
- 12.5. The various types of cookies (distinguished by their function, lifespan and origin) that we may collect include the following:
  - 12.5.1. first party cookies - cookies that are stored by the actual website or app you are visiting which are only visible to that website or app;
  - 12.5.2. necessary cookies - cookies that are necessary for the technical operation of a website or app;
  - 12.5.3. performance cookies - cookies that collect data on the performance of a website or app (such as the number of persons who visit a website or app, the time spent on the website or app, and errors that may arise during the use of the website or app);

12.5.4. functionality or preference cookies - cookies that increase the usability of a website or app by remembering a visitor's choices, such as the language preference, login information, location of the visitor, and the like;

12.5.5. targeting or advertising cookies - cookies that enable a website or app to send its visitors personalised advertising, often based on your browsing history; and

12.5.6. session cookies - these are temporary cookies that are deleted once you close your browser. Permanent cookies are those that are stored on your device until you delete them or until your browser deletes them (after a period specified in the cookie).

### **13. LINKS ON THE SITE**

The Site may include links to other apps or third party websites which are not under our control. Azuza does not accept any responsibility for your privacy or the content of these third party sites, but we display these links in order to make it easier for you to find information about specific subjects. Your use of and reliance on these links is entirely at your own risk.

### **14. RIGHT TO OBJECT**

You may, on reasonable grounds, object to us using your Personal Information for certain purposes. If you object, on such reasonable grounds as we may determine, we will stop using your Personal Information, unless the Applicable Law allows such use. Should you wish to exercise this right and/or to discuss it with us, please contact us on [support@azuzawealth.com](mailto:support@azuzawealth.com).

### **15. CHILDREN'S INFORMATION AND SENSITIVE / SPECIAL PERSONAL INFORMATION**

15.1. We do not intentionally collect or use children's Personal Information without the consent of a parent or guardian of the child unless the member is capable of consenting to the processing of his/her Personal Information in terms of the Applicable Laws in his/her/its jurisdiction.

15.2. Similarly, we do not intentionally collect or process special / sensitive Personal Information and will only do so with your consent, or if allowed by the Applicable Law.

## **16. QUALITY AND ACCESS TO YOUR INFORMATION**

16.1. Azuza strives to ensure that your Personal Information is accurate and up to date. You may request us to correct or remove any Personal Information that you think is inaccurate, by sending us an e-mail on [support@azuzawealth.com](mailto:support@azuzawealth.com).

16.2. You have the right to request that we provide you with Personal Information that we hold about you. In this regard, you must contact us directly to do so or send an e-mail to [support@azuzawealth.com](mailto:support@azuzawealth.com). This request may be subject to an access to information request in terms of the Applicable Laws and may require you to verify your identity, identify the rights you are wishing to exercise and pay a fee.

16.3. The right to access your Personal Information may further be limited in terms of the Applicable Law.

## **17. RETENTION OF INFORMATION**

17.1. We take every reasonable step to ensure that your Personal Information is only processed for the minimum period necessary for the purposes set out in this Privacy Policy.

17.2. We retain Personal Information in accordance with the required retention periods in the Applicable Law or for legitimate business purposes. We will only retain your Personal Information for the purposes explicitly set out in this Privacy Policy. We may keep Personal Information indefinitely in a de-identified format for statistical purposes, which may include, but is not limited to, statistics of how you use the Site and/or Services.

17.3. This Privacy Policy also applies when we retain your Personal Information.

17.4. We may retain your Personal Information for the duration of any period necessary to establish, exercise or defend any of our legal rights.

## **18. COMMUNICATIONS**

18.1. You may be able to post comments, leave feedback, send thank you notes, or otherwise communicate with other users through the Site. Any content, including such comments, feedback, and notes as you choose to post through the Site, are available to the public by default. You may also contact us by way of a contact form, e-mail, or by other means (such as with questions about our Services, for customer support, or the like). When you do so, we collect the information you choose to provide us, such as your contact details, any images you choose to upload (if any) and the contents and nature of your contact.

18.2. Please remember that any information that is disclosed in these areas becomes public information for both us and other members to use and share. Please be considerate and respectful of others while using the community to share your opinions. We reserve the right, but do not have the obligation, to review and monitor such posting or any other content on our Site and/or Services, and to remove postings or content that may be viewed as inappropriate or offensive to others.

## 19. SECURITY BREACH

We will report any security breach to the applicable regulatory authority in terms of the Applicable Law and to the individuals or companies whose Personal Information is involved in the breach. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your Personal Information, you are required to notify us by sending an e-mail to [security@azuzawealth.com](mailto:security@azuzawealth.com).

## 20. COMPLAINTS

20.1. Should you have any objection, or have any queries about our privacy practices, you can contact our data protection officer on [security@azuzawealth.com](mailto:security@azuzawealth.com).

20.2. Should you wish to formally lodge a complaint against us in terms of the appropriate laws, you may do so as follows:

Applicable Law	Regulatory authority	Contact details
POPI	The Information Regulator	Website: <a href="http://www.justice.gov.za/inforeg/index.html">http://www.justice.gov.za/inforeg/index.html</a> Address: SALU Building, 316 Thabo Sehume Street, Pretoria

		<p>Tel: 012 406 4818</p> <p>Fax: 086 500 3351</p> <p>E-mail: <a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a></p>
GDPR	The European Commission	<p>Online complaint procedure:</p> <p><a href="https://ec.europa.eu/info/about-european-commission/contact/problems-and-complaints/how-make-complaint-eu-level/submit-complaint_en">https://ec.europa.eu/info/about-european-commission/contact/problems-and-complaints/how-make-complaint-eu-level/submit-complaint_en</a></p> <p>Address: European Commission, Secretary-General B-1049 Brussels, BELGIUM</p>
Financial Advisory and Intermediary Service Act No. 37 of 2002	Financial Sector Conduct Authority	<p>Website: <a href="https://www.fsca.co.za/Pages/Default.aspx">https://www.fsca.co.za/Pages/Default.aspx</a></p> <p>Address: Riverwalk Office Park, Block B, 41 Matroosberg Road, Ashlea Gardens, Extension 6, Pretoria, 0081</p> <p>Tel: 012 428 8000 / 0800 2020 87</p>