

CLOVER EXTERNAL PRIVACY NOTICE

1. Purpose of this Privacy Notice

- 1.1. The purpose of this Privacy Notice is to describe how Clover Proprietary Limited, its successors and assigns, affiliates, parent companies and any of their respective associated companies and related businesses (“**Clover**”, “**we**”, “**us**” or “**our**”) collect, use, store and disclose Personal Information that Data Subjects provide to us via any of our Platforms or Services, as well as to explain the choices and rights that Data Subjects have regarding the processing of their Personal Information by Clover.
- 1.2. Personal Information refers to identifiable personal information and includes Special Personal Information and Personal Information of both natural persons and legal entities (“**Personal Information**”).
- 1.3. Our “**Platforms**” refers to our websites, mobile sites, mobile applications, social media platforms, emails, telephone lines or any other technology or channel you may use to interact with us as part of our business operations. “**Services**” refer to any products, goods, services or functionality offered, owned or operated by Clover via our Platforms or any other means.
- 1.4. This Privacy Notice applies to all external parties with whom we engage as part of our business operations or uses our Platforms or Services (“**Data Subjects**”/“**you**”/“**your**”) and where as part of such engagement or usage of our Platforms or Services, we may collect, use, and share your Personal Information.
- 1.5. By using our Platforms and Service you acknowledge that you have read and understood the terms outlined in this Privacy Notice. Therefore, you consent and agree to the processing of your Personal Information in compliance with this Privacy Notice.
- 1.6. Clover reserves the right to modify, add or remove certain sections of this Privacy Notice without notice. We encourage you to visit this Notice on a continuous basis to familiarise yourself with this External Privacy Notice.

1.7. Clover is committed to protecting your privacy and recognises that it needs to comply with statutory requirements in the collection, processing, distribution and destruction of Personal Information.

2. What Personal Information we collect

While using our Platforms or Services, you may be requested to provide certain Personal Information, which identifies you as an individual.

2.1. Personal Information we collect

- 2.1.1. Contact Information such as Company name, contact persons, e-mail addresses, physical address, phone and mobile numbers;
- 2.1.2. Account and payment information such as authorised account users, VAT and Income tax reference numbers, bank details, invoices and records, SWIFT and IBAN details;
- 2.1.3. Verification Information such as username, password, password reminder questions and password answers;
- 2.1.4. Identifiers such as Company registration numbers, identity numbers, Supplier/Vendor number, B-BBEE status, vehicle registration numbers, driver's license, physical addresses;
- 2.1.5. Contract information including product or services information, commercial terms of the contract, contract performance and non-performance;
- 2.1.6. Tender request information including client references, proof of insurance and tax clearance certificate of good standing, account details;
- 2.1.7. Website, Mobile Applications and Social Media information: when you access any Clover website (or special purpose portals) including any brand websites, we collect your IP address and other technical information about your computer and website usage;

- 2.1.8. Financial information such as financial statements, credit and trade references, shareholders, trustees and sureties;
- 2.1.9. Background and Credit information including credit status and depending on the nature of the services/contract, criminal record and fraud checks;
- 2.1.10. Principles Information: where you apply for credit, the name, ID numbers, and residential addresses of your partners, shareholders and directors and details of property/is owned by principals (Sole Owner / Partners / Members / Directors);
- 2.1.11. CCTV: we may process videos of you obtained via our CCTV surveillance systems;
- 2.1.12. Recruitment information: CV/resume, SA ID number, passport number; training records, education and work history, address, contact details, certifications/qualifications;
- 2.1.13. Information relating to individual consumers of our products: such as name, phone number, email address, physical address, mobile phone number, preferred language, details of complaints, bank account details for payment of any agreed settlement amount, medical information were the basis if the claim is health related.

3. How we Collect Personal Information

3.1 We collect Personal Information directly from you in following ways:

- a) When you voluntary disclose your Personal Information, which includes any Personal Information that you voluntarily provide to us directly, whether through our Platforms or Services, which may include information you give to us:

- by filling in forms on our Platforms (e.g. when you register on our Platforms or subscribe to use services on our Platforms);
- when you enter a competition, promotion or complete a survey; by posting comments or content on our Platforms; when you purchase one of our products or services;
- when you contact us and when you otherwise provide information directly to us.
- Personal Information we collect or receive when you use our Platforms or Services.

b) We negotiate and conclude an agreement with you;

c) You engage with us, such as through emails, complaints or queries via Our call centres;

d) You enter any of Our Sites, Offices, Facilities and work areas (for example via CCTV);

e) You interact with Our support, sales and account management teams;

f) You render any services to us as a third-party service provider or sell or purchase Products from us;

g) when You reply to a Request for Quotation or Request for Tenders;

h) You apply for credit.

3.2 We collect Personal Information indirectly from you in following ways:

a) via other companies in the Clover Group of companies;

b) Websites, by phone, email, or through your participation in a survey conducted through third party websites (including our branded sites which

may be managed by third parties) or through social media platforms such as Facebook, Snapchat, Instagram, LinkedIn and TikTok;

- c) public sources and registers (such as company registers, online search engines, (title) deeds registries, public posts on social media);
- d) third parties that we engage for the purposes of conducting its business (list providers, credit bureaux, regulators and government departments and third-party service providers);
- e) employment agencies, background check providers, former employers, credit reference agencies or other background check agencies.

4. What We Use your Personal Information For

We use your Personal information –

- 4.1 enable you to make use of our Platforms in the manner described on our Platforms;
- 4.2 to operate our business;
- 4.3 register and/or authenticate users of and/or visitors to our Platforms;
- 4.4 identify and take reasonable measures to prevent fraudulent use of or access to our Platforms;
- 4.5 compile non-personal statistical information about browsing habits, click patterns and access to our Platforms;
- 4.6 to implement and manage relationships with you including onboarding as a Vendor or Customer, processing and fulfilling orders, sending invoices, processing payments, accounting, auditing, billing, collection and returns;

- 4.7 to provide customer services (for example, product recalls, tracking, and responding to product quality concerns);
- 4.8 to comply with any legislation or regulation which requires us to collect the information;
- 4.9 to comply with demands or requests made by Regulators, Governmental Authorities and Law Enforcement Authorities;
- 4.10 to monitor and analyse trends, usage and activities in connection with Our products;
- 4.11 to ensure we have your up-to-date contact information;
- 4.12 to conduct internal audits and investigations.

5. Special Personal Information

Where we need to Process your Special Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable laws.

6. Who we share the Personal Information with

- 6.1 We may share your Personal Information with –
 - 6.1.1 third-party service providers who provide services to us, including but not limiting to supporting, operating, securing and hosting our information technology systems, providers of customer experience services, payment processing, order fulfilment, product management, logistics and returns, debt collection, document and information storage;
 - 6.1.2 Our professional advisors;

6.1.3 law enforcement, government officials, or other third parties as may be necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability;

6.1.4 third parties (such as a potential purchaser and its professional advisors) in the event of any reorganisation, merger, divestiture, acquisition, consolidation, restructure, sale, joint venture, or other disposition of any or all of our assets.

7. Personal Information of Children

We do not intentionally collect Personal Information from children under the age of 18 years.

8. Transfer of Personal Information to Other Countries

8.1 We are a global organization and regardless of where you use or access our Platforms, Products, or Services, your information may be transferred to and maintained on servers located in South Africa (or elsewhere in the world) and we may transfer certain Personal Information across geographical borders to –

8.1.1 Clover Group companies;

8.1.2 service providers for the purposes set out in 6 above;

8.1.3 verify and undertake risk assessments of new Vendors/Customers.

8.2 Where we transfer your Personal Information outside of South Africa, we ensure that we do so in accordance with the requirements for lawful transfer outside of South Africa as set out in the Protection of Personal Information Act No.4 of 2013 (“POPIA”).

You consent to the transfer of your Personal Information outside of South Africa across geographical borders for the purposes set out in this section 8.

8.3 Some of the persons to whom we disclose your personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, we may send your personal information to service providers outside of the RSA for storage or processing on Clover's behalf. However, we will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

9. How Long Do we Keep your Personal Information

We will retain your Personal Information for as long as necessary to achieve the purpose for which it was collected or subsequently processed.

9.1 Personal Information may be held for longer periods where:

9.1.1 retention of the record is required or authorised by law;

9.1.2 we reasonably require the record for lawful purposes related to Our functions or activities;

9.1.3 retention of the record is required by a contract between you and us; or

9.1.4 You have consented to the retention of the record.

10 Your Personal Information and rights

If you have questions regarding any matter relating to your privacy or your personal information, or if you believe there has been a breach of your privacy or your personal information, you may either:

10.1 Contact the Group Privacy Officer via e-mail at cloverprivacyoffice@clover.co.za.

We will always require you to verify that you are in fact the owner of the Personal Information; or

10.2 file a request for access to personal information in accordance with the Clover Manual in terms of Section 51 of the Promotion of Access to Information Act, No 2 of 2000 available <https://www.clover.co.za/paia-manual/>; or

10.3 You may lodge a complaint in respect of this Privacy Notice or any of Our Personal Information Processing activities with the Information Regulator, whose contact details are available on its website at <https://www.justice.gov.za/infoereg/> or www.justice.gov.za

11 Consent

By providing your Personal Information, details and/or any other information to us, by using our Platforms and/or Service and/or through any form of engagement with us, you hereby consent to Clover processing the Personal Information as stipulated in this Notice. You further acknowledge that you are:

11.1 supplying the Personal Information voluntarily and without any undue influence from any party;

11.2 supplying the Personal Information because it is mandatory to supply it to enable Clover to provide the services to you and/or to carry out any agreement/s that may exist between you and us; and

11.3 that failure to provide the Personal Information will result in Clover not being able to provide the services to you and/or to carry out any agreement/s that may exist between you and us.

12 Revisions to the Notice

We may update this Privacy Notice from time to time. Changes to this Privacy Notice will not necessarily be preceded by a notice posted on the website, and we encourage you to check the Privacy Notice periodically for changes.