

## **DOTS AFRICA**

### **PRIVACY AND CONSENT POLICIES**

#### **1. About Us**

Zoia Consulting Proprietary Limited T/A Dots Africa (“Dots Africa”) is a straightforward and speedy online background checks platform (“the Services”) that complements informed decision-making, covers the corners you can’t reach and remains a constant partner in individual and enterprise risk management solutions.

#### **2. Key Terms**

2.1. In this privacy policy, these terms have the following meanings:

- 2.1.1. "Cookies" means small text files that store Non-personally Identifiable Information/Data about Data Subjects, either temporarily in connection with a Data Subjects Internet Protocol (IP) address (known as a temporary or session cookie, and deleted once a Data Subject closes their browser window) or more permanently on the hard drive of a Data Subject’s device (known as a permanent or persistent cookie). Dots website(s) or Mobile Application(s) may from time to time use session cookies so that Data Subject’s do not have to fill in the same information from page to page within our Website(s) or Mobile Application(s). If Data Subject’s elect not to receive cookies, they may be able to view some, but not all, of the content on our Website(s) or Mobile Application(s);
- 2.1.2. "Data Subject" means a person, whether a natural or a juristic person, forming the subject matter of a Data Enquiry;
- 2.1.3. “Data Enquiry” means a request for the supply of Search Data relating to a Data Subject submitted by a Platform User to Dots Africa by means our Website;
- 2.1.4. "Platform User" means any person or entity that is registered with us to use the Services;
- 2.1.5. "Personal Information" means any information that identifies or can be used to identify a Platform User, a Data Subject, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information;
- 2.1.6. “Search Data” means any information relating to a Data Subject, including Personal Information and information relating to a Data Subject’s:
  - 2.1.6.1. ownership of immovable property, including the identity, location and value of such immovable property;

- 2.1.6.2. identity number, registration number, or other identifying number or mark;
- 2.1.6.3. registration as a company, close corporation, trust or other juristic person;
- 2.1.6.4. trademark registrations;
- 2.1.6.5. participation in any company, close corporation, trust or other juristic person;
- 2.1.6.6. ownership of any motor vehicle, including registration details and financing arrangements;
- 2.1.6.7. past employment history; including the circumstances of termination of any employment, career, professional or business relationship;
- 2.1.6.8. educational qualifications;
- 2.1.6.9. driving license;
- 2.1.6.10. criminal record;
- 2.1.6.11. credit profile including information relating to applications for credit, credit agreements to which the Data Subject is or has been a party, pattern of payment or default under any such credit agreements, debt re-arrangements in terms of the National Credit Act, incidence of enforcement actions with respect to any such credit agreement, the circumstances of termination of any such credit agreement, and related matters;
- 2.1.6.12. potential contact information;
- 2.1.6.13. marital status, existence, children identity;
- 2.1.6.14. bank account;
- 2.1.6.15. VAT numbers.
- 2.1.7. "Website(s)" means any website(s) we own and operate (such as <http://www.dots.africa> or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy;
- 2.1.8. "Visitor" means any person who visits any of our Websites;
- 2.1.9. "you" and "your" means, depending on the context, either a Platform User, a Data Subject, or a Visitor.

### 3. Cookies and Tracking Technologies

4. We use cookies and similar tracking technologies to collect and use Personal Information about you, including to serve interest-based advertising. For further information about the types of cookies and tracking technologies we use, why, and how you can control them, please see our Cookie Statement [Cookie Policy](#) . **Privacy for Platform Users**

This section applies to the Personal Information and Search Data we collect and process from a Platform User or potential Platform User through the provision of the Services. If you are not a Platform User, the Visitors or Data Subject section of this policy may be more applicable to you and your data. In this section, "you" and "your" refer to Platform Users and potential Platform Users.

#### 4.1. Information We Collect

The Personal Information and Search Data that we may collect broadly falls into the following categories:

- 4.1.1. Information you provide to us: In the course of engaging with our Services, you may provide Personal Information about you and your Data Subject. Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, consult with our customer service team, send us an email, integrate the Services with another website or service, or communicate with us in any other way.
- 4.1.2. We will let you know prior to collection whether the provision of Personal Information we are collecting is compulsory or if it may be provided on a voluntary basis and the consequences, if any, of not providing the information. By giving us this information, you agree to this information being collected, used and disclosed as described in our [Terms and Conditions](#) and in this privacy policy.

#### 4.2. This information may include:

- 4.2.1. Registration information: You need a Dots Africa account to use the Services as a Platform User. When you register for an account, you will be asked to provide certain basic information, such as your name, ID number, email address, username, password, company name, occupation, location, and phone number.
- 4.2.2. Billing and communications information: If you purchase our Services, you may also need to provide us with payment and billing information, such as your credit card details and billing address. Dots Africa will also maintain a record of your billing transactions and purchases, and any communications and responses.
- 4.2.3. Information we process on your behalf: In order to access the Services or use certain features in your account, you need to upload a Data Enquiry that provides us

information about your Data Subject, such as their names and ID numbers, email addresses. We use and process this information to provide the Services in accordance with your instructions.

- 4.2.4. Information we collect automatically: When you use the Services, we may automatically collect certain information about your device and usage of the Services. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Statement [\[Cookie Policy\]](#). This information may include:
- 4.2.4.1. Device information: We collect information about the device and applications you use to access the Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
- 4.2.4.2. Log data: Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our Services.
- 4.2.4.3. Product usage data: We collect usage data about you whenever you interact with our Services, which may include the dates and times you access the Services and your browsing activities (such as what portions of the Services are used). We also collect information regarding the performance of the Services. This information allows us to improve the content and operation of the Services, and facilitate research and analysis of the Services.
- 4.2.5. Information we collect from other sources: From time to time, we may obtain information about you or your Data Subject from third-party sources, such as public databases, social media platforms, third-party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.
- 4.2.5.1. Examples of the information we receive from other sources include demographic information (such as age and gender), device information (such as IP addresses), location (such as city and state), and online behavioural data (such as information about use of social media websites, page view information and search results and links). We use this information, alone or in combination with other information (including Personal Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and services.

4.2.5.2. Our joint marketing partners include; Way API Sync Between Active Campaign & Dots User DB: Updates our maintenance email list with current clients to serve marketing campaigns, One-Way API Push to Active Campaign: Both the above-mentioned email subscription, and request demo data is passed through this API to Active Campaign over SSL and encrypted servers for use as part of the Marketing & CRM processes, Browser Cookies (Google Analytics, Google Optimize 3rd Party Cookies): Implemented using Google Tag Manager and data used to monitor user behaviour on the website and app for marketing and usability purposes, Zendesk Chat/Support Widget: embedded on the website through JavaScript code injection. This widget collects email addresses and names of both clients and non-clients to request assistance with any aspect of the site or app.

4.2.6. Information from the use of our mobile apps: When you use our mobile apps, we may collect certain device and usage-related information in addition to information described below:

4.2.6.1. Device information: We may collect information about the type of device and operating system you use. We do not ask for, access, or track any location-based information from your mobile device at any time while downloading or using our mobile apps or Services.

4.2.6.2. Product usage data: We may use mobile analytics software (such as [Fabric.io](#)) to better understand how people use our application. We may collect information about how often you use the application and other performance data.

### 4.3. Use of Personal Information and Search Data

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

4.3.1. To bill and collect money owed to us by you. This includes sending you emails, invoices, receipts, notices of default, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the "Our Security" section of this privacy policy.

4.3.2. To send you system alert messages. For example, we may inform you about temporary or permanent changes to our Services, such as planned outages, or send your account, security or compliance notifications, such as new features, version updates, releases, abuse warnings, and changes to this privacy policy.

4.3.3. To communicate with you about your account and provide customer support.

- 4.3.4. To enforce compliance with our Terms and Conditions and applicable law, and to protect the rights and safety of our Platform Users and third parties, as well as our own. This may include developing tools and algorithms that help us prevent violations. For example, we have applications that periodically delete private user data stored on our systems. This data includes, but is not limited to, credit data, criminal record data, contact numbers, ID/Passport numbers and email addresses.
- 4.3.5. To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- 4.3.6. To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- 4.3.7. To prosecute and defend a court, arbitration, or similar legal proceeding.
- 4.3.8. To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 4.3.9. To provide, support and improve the Services. For example, this may include sharing your or your Data Subjects' information with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we share Personal Information and Search Data with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information and Search Data we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.
- 4.3.10. To provide suggestions to you. Some of these suggestions are generated by use of our data analytics projects, which are described below. For more information about our use of cookies and other tracking technologies for this purpose, and instructions about how to opt out of having data collected through the use of cookies, please see our Cookie Statement [Cookie Policy](#).
- 4.3.11. For our data analytics projects. Our data analytics projects use data from Dots Africa accounts, including Personal Information of Data Subject, to provide and improve the Services. We use information like your sending habits and your Data Subject' details and purchase history, so we can make more informed predictions, decisions, and products for our Platform Users. If you or your Contact prefers not to share this data, you can alter the security settings on your account (as described in our [Terms and Conditions](#)) to opt out of data analytics projects, or your Contact can opt out of data analytics projects at any time by emailing us at [info@dots.africa](mailto:info@dots.africa). For example, we use data from Dots Africa accounts to enable product recommendation, audience segmentation, and predicted demographics features for our Platform Users. We will act as a data controller

to process data for our data analytics projects in reliance on our legitimate business interests of improving and enhancing our products and services for our Platform Users. As always, we take the privacy of Personal Information and Search Data seriously, and will continue to implement appropriate safeguards to protect this Personal Information and Search Data from misuse or unauthorized disclosure.

- 4.3.12. Combined information. We may combine Personal Information and Search Data with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.
- 4.3.13. Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

#### 4.4. Platform User Data Enquiries

- 4.4.1. A Data Enquiry can be created in a number of ways, including by importing Search Data and Personal Information, such as manually by a Platform User, through a CSV or directly from your email. Your Data Enquiries are stored on a secure Dots Africa server. We do not, under any circumstances, sell your Data Enquiries. If someone on your Data Enquiry complains or contacts us, we might then contact that person. You may export (download) your Data Enquiries from Dots Africa at any time.
- 4.4.2. If we detect illegal behaviour related to your Data Enquiry, we may share your Data Enquiry or portions of it with the relevant authorities to the extent permitted or required by applicable law.

#### 4.5. Other Data Protection Rights

- 4.5.1. You and your Data Subject may have the following data protection rights:
- 4.5.1.1. To access, correct, update or request deletion of Personal Information. Dots Africa takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date. As a Platform User manage your Personal Information and Search Data by contacting us directly by emailing us at [info@dots.africa](mailto:info@dots.africa).
- 4.5.1.2. In addition, Data Subjects' can object to processing of their Personal Information, ask to restrict processing of their Personal Information or request portability of their Personal Information. You can exercise these rights by contacting us using the contact

details provided in the "Contact Details" section below. If any of your Data Subjects' wish to exercise any of these rights, they should contact you directly, or contact us as described in the "Privacy for Data Subject" section below.

4.5.1.3. Similarly, if Personal Information is collected or processed on the basis of consent, the Data Subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

4.5.1.4. The right to complain to the relevant authority about the collection and use of Personal Information and Search Data.

4.5.2. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your Data Subjects, we will either direct the Data Subject to reach out to you, or, if appropriate, we may respond directly to their request.

## **5. Privacy for Data Subjects'**

This section applies to the information we process about our Platform Users' Data Subjects' as a data controller pursuant to our legitimate business interests, as explained in the "Legal Basis for Processing" section below. Our Services are intended for use by our Platform Users. As a result, for much of the Personal Information we collect and process about Data Subject through the Services, we act as a processor on behalf of our Platform Users. Platform Users' are bound by this privacy Policy in terms of the Terms and Conditions between the Platform User and Dots Africa. For purposes of this section, "you" and "your" refer to Data Subjects'.

### **5.1. Information We Collect**

The Personal Information that we may collect or receive about you broadly falls into the following categories:

5.1.1. Information we receive about Data Subject from our Platform Users: A Platform User may provide Personal Information and Search Data about you to us through the Services. For example, when a Platform User uploads their Data Enquiry or integrates the Services with another website or service (for example, when a Platform User chooses to submit a Data Enquiry), or when you sign up for a Platform User's Data Enquiry on a Dots Africa signup form, they may provide us with certain contact information or other Personal Information about you such as your name, email address, address or telephone number. You may have the opportunity to update some of this



information by electing to update or manage your preferences via an email you receive from a Platform User.

5.1.2. Information we collect automatically: When you interact with a Data Enquiry that you receive from a Platform User or browse or purchase from a Platform User's connected store, we may collect information about your device and interaction with an email. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our Cookie Statement [Cookie Policy](#) .

5.1.2.1. Device information: We collect information about the device and applications you use to access emails sent through our Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.

5.1.2.2. Product usage data: We collect usage data about you whenever you interact with emails sent through the Services, which may include dates and times you access emails and your browsing activities (such as what pages are viewed). We also collect information regarding the performance of the Services, including metrics related to the deliverability of emails and other electronic communications our Platform Users send through the Services. This information allows us to improve the content and operation of the Services, and facilitate research and analysis of the Services.

5.1.3. Information we collect from other sources: From time to time, we may obtain information about you from third-party sources, such as social media platforms and third-party data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us, and we use this information to provide publicly available information about you to Platform Users who have requested a Data Enquiry on their Dots Africa accounts.

## 5.2. Use of Personal Information

We may use the Personal Information we collect or receive about you for our legitimate business interests, including:

- 5.2.1. To enforce compliance with our Terms and Conditions and applicable law. This may include developing tools and algorithms that help us prevent violations.
- 5.2.2. To protect the rights and safety of our Platform Users and third parties, as well as our own. For example, sometimes we review the consents provided by our Platform Users' to make sure they comply with our Terms and Conditions.
- 5.2.3. To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.

- 5.2.4. To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- 5.2.5. To prosecute and defend a court, arbitration, or similar legal proceeding.
- 5.2.6. To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 5.2.7. To provide, support and improve the Services. For example, this may include sharing your information with third parties in order to provide and support our Services or to make certain features of the Services available to our Platform Users. When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.
- 5.2.8. For our data analytics projects. Our data analytics projects use data from Dots Africa accounts, including your Personal Information and Search Data, to provide and improve the Services. We use information, like your purchase history, provided to us by Platform Users, so we can make more informed predictions, decisions, and products for our Platform Users. For example, we use data from Dots Africa accounts to enable product recommendation, audience segmentation, and predicted demographics features for our Platform Users. If you prefer not to share this data, you can opt out of data analytics projects at any time by emailing us at [info@dots.africa](mailto:info@dots.africa)
- 5.2.9. Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes.

### 5.3. Legal Basis for Processing

We process Personal Information about you as a data controller as described in this section, where such processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products and services; and ensuring the security of the Services and our Website.

### 5.4. Other Data Protection Rights

- 5.4.1. You may have the following data protection rights:
  - 5.4.1.1. To access, correct, update or request deletion of your Personal Information. Dots Africa takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about

accessing, correcting, updating or deleting your Personal Information and/or Search Data, or altering your data, by submitting a request to us [info@dots.africa](mailto:info@dots.africa). We will consider your request in accordance with applicable laws.

5.4.1.2. In addition, a Data Subject can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. Again, you can exercise these rights by emailing us at [info@dots.africa](mailto:info@dots.africa).

5.4.1.3. You have the right to complain to a data protection authority about our collection and use of your Personal Information.

5.4.2. As described above, for much of the Personal Information and Search Data we collect and process about Data Subjects' through the Services, we act as a processor on behalf of our Platform Users. In such cases, if you are a Data Subject and want to exercise any data protection rights that may be available to you under applicable law or have questions or concerns about how your Personal Information and Search Data is handled by Dots Africa as a processor on behalf of our individual Platform Users, you should contact the relevant Platform User that is using the Dots Africa Services and refer to their separate privacy policies.

5.4.3. If you no longer want to be contacted by one of our Platform Users through our Services you may contact us directly, we may remove or update your information within a reasonable time and after providing notice to the Platform User of your request.

5.4.4. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

## **6. Privacy for Visitors**

This section applies to Personal Information that we collect and process through our Websites and in the usual course of our business, such as in connection with our recruitment, events, sales and marketing activities. In this section "you" and "your" refers to Visitors.

### **6.1. Information We Collect**

6.1.1. Information you provide to us on the Websites or otherwise: Certain parts of our websites may ask you to provide Personal Information voluntarily. For example, we may ask you to provide certain Personal Information (such as your name, contact details, company name, profile information) in order to sign up for a free or paid Dots Africa account, apply for a role with Dots Africa, or otherwise submit inquiries to us. We may also collect Personal Information, such as your contact and job details and feedback,

when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us, and we will keep copies of any such communications for our records.

- 6.1.2. The Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Information. We will also let you know prior to collection whether the provision of the Personal Information we are collecting is compulsory or may be provided on a voluntary basis and the consequences, if any, of not providing the information.
- 6.1.3. Information we collect automatically through the Websites: When you visit our Websites, we may also collect certain information automatically from your device. In South Africa and the European Economic Area, this information may be considered Personal Information under applicable data protection laws.
- 6.1.4. Specifically, the information we collect automatically may include your IP address, your operating system, your browser ID, your browsing activity, and other information about your system and connection and how you interact with our Websites and other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our Cookie Statement [Cookie Policy](#).

## 6.2. Use of Personal Information

- 6.2.1. We may use the information we collect through our Websites for a range of reasons, including:
  - 6.2.1.1. To provide, operate, optimize, and maintain our Websites.
  - 6.2.1.2. To send you information for marketing purposes, in accordance with your marketing preferences.
  - 6.2.1.3. For recruitment purposes if you have applied for a role with Dots Africa.
  - 6.2.1.4. To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
  - 6.2.1.5. To manage our Websites and system administration and security.
  - 6.2.1.6. To improve the navigation and content of our Websites.
  - 6.2.1.7. To identify any server problems or other IT or network issues.

- 6.2.1.8. To process transactions and to set up online accounts.
- 6.2.1.9. To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- 6.2.1.10. To carry out research and development to improve our products and services.
- 6.2.1.11. To customize content and layout of the Websites.
- 6.2.1.12. To carry out other legitimate business purposes, as well as other lawful purposes.

6.2.2. In addition, we may combine Personal Information and Search Data with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information and Search Data.

### **6.3. Public Information and Third-Party Websites**

- 6.3.1. Blog. We have public blogs on our Websites. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact us <https://www.dots.africa/dots-africa/contact-us>. If we are unable to remove your information, we will tell you why.
- 6.3.2. Social media platforms and widgets. Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. We also maintain presences on social media platforms, including Facebook, Twitter, LinkedIn, and Instagram. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.
- 6.3.3. Links to third-party websites. Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

6.3.4. Surveys. We may, from time to time, offer surveys or other promotions on our Websites or through social media (collectively, "Promotions"). Participation in our Promotions is completely voluntary. Information requested for entry may include Personal Information such as your name, address, date of birth, phone number, email address, username, and similar details. We use the information you provide to administer our Promotions. We may also, unless prohibited by the Promotion's rules or law, use the information provided to communicate with you, or other people you select, about our Services. We may share this information with our affiliates and other organizations or service providers in line with this privacy policy and the rules posted for our Promotions.

#### 6.4. Other Data Protection Rights

6.4.1. You have the following data protection rights:

6.4.1.1. To access, correct, update, or request deletion of your Personal Information and Search Data. Dots Africa takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating, or deleting your Personal Information and Search Data, or altering your data or marketing preferences by emailing us at [info@dots.africa](mailto:info@dots.africa). We will consider your request in accordance with applicable laws.

6.4.1.2. In addition, you can object to processing of your Personal Information and Search Data, ask us to restrict processing of your Personal Information and Search Data or request portability of your Personal Information and Search Data. Again, you can exercise these rights by emailing us at [info@dots.africa](mailto:info@dots.africa).

6.4.1.3. Similarly, if we have collected and processed your Personal Information and Search Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

6.4.1.4. You have the right to complain to a data protection authority about our collection and use of your Personal Information.

6.4.2. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

### 7. General Information

#### 7.1. How We Share Information

- 7.2. We may share and disclose your Personal Information and Search Data to the following types of third parties for the purposes described in this privacy policy (for purposes of this section, "you" and "your" refer to Platform Users, Data Subject, and Visitors unless otherwise indicated):
- 7.2.1. Our service providers: Sometimes, we share your information with our third-party service providers, who help us provide and support our Services and other business-related functions.
    - 7.2.1.1. For example, if it is necessary to provide Platform Users with information relating to a Data Enquiry, then we may share Platform Users' or Data Subject' Personal and Search Data Information with a service provider for that purpose. Other examples include analysing data, hosting data, engaging technical support for our Services, processing payments, and delivering content.
    - 7.2.1.2. These third-party service providers enter into a contract that requires them to use your Personal Information and Search Data only for the provision of services to us and in a manner that is consistent with this privacy policy.
    - 7.2.1.3. In connection with our Services, our third-party service providers include; Department of Home Affairs, TransUnion, Compuscan, XDS, Experian, FSCA, Purq, Umalusi, Department of Basic Education, Department of Higher Education, SAFPS, QCTO, DMR, other; academic institutions.
    - 7.2.1.4. Other third party
  - 7.2.2. Advertising partners: We may partner with third-party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information of Platform Users and Visitors with them for this purpose. We do not sell or market to any of our Platform Users' contacts. We and our third-party partners may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites in order to provide you with targeted advertising based on your browsing activities and interests.
  - 7.2.3. Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.
  - 7.2.4. A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this privacy policy, including your rights to access

and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.

7.2.5. Any other person with your consent.

### **7.3. Legal Basis for Processing Personal Information**

7.3.1. If you are from the European Economic Area, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information and Search Data concerned and the specific context in which we collect it.

7.3.2. However, we will normally collect and use Personal Information from you where the processing is in our legitimate interests and not overridden by your data-protection interests or fundamental rights and freedoms. Typically, our legitimate interests include improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Services and our Websites; and for our marketing activities.

7.3.3. If you are a Platform User, we may need the Personal Information and Search Data to perform a contract with you. In some limited cases, we may also have a legal obligation to collect Personal Information and Search Data from you.

7.3.4. If we ask you to provide Personal Information and Search Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information.

7.3.5. Where required by law, we will collect Personal Information and Search Data only where we have your consent to do so and our Platform Users are required to obtain your consent to do so where necessary and where we are not in a position to acquire your consent ourselves.

7.3.6. If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the "Contact Details" section below.

### **7.4. Your Choices and Opt-Outs**

7.4.1. Platform Users and Visitors who have opted in to our marketing emails can opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link at the bottom of our marketing messages.



7.4.2. Also, all opt-out requests can be made by emailing us using the contact details provided in the "Contact Details" section below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Platform Users cannot opt out of these messages unless you cancel your Dots Africa account.

## **8. Our Security**

- 8.1. We take appropriate and reasonable technical and organizational measures to protect Personal Information and Search Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information and Search Data. For further information about our security practices and if you have any questions about the security of your Personal Information, you may contact us at **info@dots.africa**.
- 8.2. Dots Africa accounts require a username and password to log in. Platform Users must keep their username and password secure, and never disclose it to a third party. Because the information in a Platform User's Dots Africa account is so sensitive, account passwords are hashed, which means we cannot see a Platform User's password. We cannot resend forgotten passwords either. We will only provide Platform Users with instructions on how to reset them.

## **9. International Transfers**

Unless permitted under the law or your consent is obtained, Dots Africa will not transfer your Personal Information outside the Republic of South Africa.

## **10. Retention of Data**

- 10.1. We retain Personal Information and Search Data where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:
- 10.1.1. Whether we have a legal or contractual need to retain the data.
  - 10.1.2. Whether the data is necessary to provide our Services.
  - 10.1.3. Whether our Platform Users have the ability to access and delete the data within their Dots Africa accounts.
  - 10.1.4. Whether our Platform Users would reasonably expect that we would retain the data until they remove it or until their Dots Africa accounts are closed or terminated.

- 10.2. When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

### **11. Changes to this Policy**

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Website.

### **12. Contact Details**

Email: [info@dots.africa](mailto:info@dots.africa)

Tel: 010 446 7683