



PRIVACY AND DATA PROTECTION POLICY

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We respect your privacy. Callouts like this are a summary of our privacy and data protection policy and contain the most important and relevant points for you. Please read the policy because it applies to you.

Introduction

Welcome to our privacy and data protection policy. We are Escrow Europe (Pty) Ltd t/a **ESCROWSURE**, Registration Number 2003/021564/07, and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

This policy applies to visitors to our website www.escrowsure.co.za and customers using our portal <https://portal.escrowsure.co.za/login> and any services that we may provide to you.

The purpose of this policy is to describe the way that we handle your personal information.

Data Security

Encryption of Data in Transit and at Rest

All form submissions, user login details, and transmitted data through our website are encrypted in transit using TLS 1.3. Where data is stored (e.g., web form submissions or logs), it is encrypted at rest using AES-256 or equivalent standards. We continuously review and update our cryptographic protocols to reflect best practices.

Password Handling

User passwords are never logged or stored in plain text. We hash all passwords using secure, one-way cryptographic algorithms with salting, aligned with global cybersecurity standards.

Access Control

Access to any personal data is strictly limited to authorized personnel only, based on role-based access control (RBAC) principles. Our systems enforce RBAC and two-factor authentication where applicable to reduce the risk of unauthorized access.

Our privacy principles

- We are the custodians of your personal information;
- We believe that more transparency is better than less;
- Our products are easy to use and understand, which benefits our customers;
- You can easily access your information from any device;
- Anything you post in our portal can be viewed by other users of our service; and
- We moderate all content uploaded to our forums and we will delete content that is not applicable to this service.

Audience

This policy applies to you if you are:

- a visitor to our website; or
- a customer who has ordered the services that we provide; or
- a user of our services.

This policy applies to you under certain circumstances.

What is personal information?

Personal information *includes*:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration via our portal;
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but *excludes*:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Personal information includes information we collect (i) automatically when you visit our website, and (ii) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name or company name;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address;
- **demographic information** – such as your gender.

Sensitive personal information

Depending on the services that you require, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details; and
- **sensitive demographic information** – such as your race or ethnicity.

Acceptance

Acceptance required

You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then you may not request our services.

You may not request our services if you do not accept this policy.

Legal capacity

You may not access our website or order our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

How do we collect personal information?

Submit enquiry

When you submit an enquiry, you will no longer be anonymous to us.

This personal information will include:

- your name and surname;
- your email address;
- your telephone number;
- your company name;

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

We collect certain information when you submit an enquiry on our website.

On order

When you order any services from us, you will be asked to provide us with additional information on a voluntary basis (**services information**).

We collect certain information when you make use of our services, necessary to provide the services to you.

From browser

We automatically receive and record internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

We collect certain information from your web browser, including your internet usage information when you visit our website.

Cookies

For information on how we deal with cookies, please refer to our Cookies Policy.

Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

We collect certain information from web beacons on our website to compile anonymous information about our website.

Data Retention and Deletion

Web form submissions and related technical logs are retained for no longer than 6 months unless otherwise required by law. After this period, all data is securely deleted using cryptographic erasure or equivalent secure deletion methods

Optional details

You may also provide additional information to us on a voluntary basis (**optional information**). This includes content that you decide to upload or download from our website or when you enter competitions, take advantage or promotions, respond to surveys, order certain services, or otherwise use the optional features and functionality of our website.

We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and order certain services.

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

Purpose for processing

We may use or process any goods information, services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **services purposes** – such as providing our services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and

- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

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

We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.

Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

We may use your information for targeted content in certain, specified instances.

Reasons we share personal information

Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods suppliers or service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology

services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit);

- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

Security

Introduction

There is no such thing as “perfect security”. We have to compromise between increased levels of security and the convenience to you in transacting with us.

Our security responsibilities

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our security disclaimers

Please note the following:

- The third parties whose systems we link to are responsible for the security of information while it is collected by, stored on, or passing through the systems under their control.
- We will use all reasonable endeavours to ensure that our website and your information is not compromised. However, we cannot guarantee that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites (addressed below).
- If you experience a problem or loss that is caused by information you provided to us, your computer being compromised in some way or by something beyond our control, we cannot take responsibility for causing the problem. We will, however, do our best to help you if we can.

Phishing

You must only log in to your account from a page that begins with <https://www.escrowsure.co.za>

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Please keep your personal information accurate and up to date by accessing your account, emailing us, by phoning us.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

We will only retain your personal information for as long as is necessary.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

We may transfer your personal information outside the country in which it was collected to a foreign country.

Your Data Protection Rights

In accordance with applicable data protection legislation, including the Protection of Personal Information Act (POPIA) and the General Data Protection Regulation (GDPR), you have the following rights:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to object to processing
- Right to data portability
- Rights in relation to automated decision-making and profiling

How to Exercise Your Rights

To exercise any of these rights, please contact our privacy officer via one of the following methods:

Email: privacy@escrowsure.co.za

Mail: Postnet Suite 306, P/Bag X29, Somerset West, 7129

We will respond within 30 calendar days of receiving a valid request.