



Adumo Online (Pty) Ltd

PRIVACY NOTICE

DOCUMENT CONTROL
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1. PURPOSE OF THIS NOTICE

- 1.1. Protecting merchant' personal information is important to Adumo Online. Adumo Online undertakes to process a merchant's personal information lawfully and in a manner that does not infringe the merchant's privacy. The merchant's personal information will only be processed for reasons set-out herein. Adumo Online follows general principles in accordance with applicable privacy laws.
- 1.2. This merchant privacy notice ("Notice") demonstrates to merchants, how Adumo Online collects, uses and safeguards merchants' personal information.
- 1.3. In terms of applicable privacy laws, this Notice may also apply to personal information processed by third parties (such as authorised agents and contractors) appointed by or acting on Adumo Online's behalf.
- 1.4. In this Notice "process" means how Adumo Online collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with merchants' personal information. As a general rule, Adumo Online will only process merchants' personal information if this is required when offering or delivering a solution to a merchant. Adumo Online respects merchants' privacy and will treat their personal information as confidential information.
- 1.5. Adumo Online may combine merchants' personal information and use the combined personal information for any of the purposes stated in this Notice.
- 1.6. Merchants should read the consent request carefully as it may limit their rights.
- 1.7. The processing of the merchant's personal information may be conducted outside the borders of South Africa. This Notice will apply to the processing of personal information by Adumo Online in any country. Your personal information will be processed according to the requirements and safeguards of applicable privacy law or privacy rules that bind Adumo Online.
- 1.8. Adumo Online may change this Notice from time to time if required by law or as a result of business practices. Where the change is material, Adumo Online will notify merchants and will allow a reasonable period for merchants to raise any objections before the change is made. Please note that Adumo Online may not be able to continue a relationship with a merchant or provide merchants with certain solutions if they do not agree to the changes.
- 1.9. The latest version of the Notice is displayed on Adumo Online's website at www.adumoonline.com and applies to all merchant interactions with Adumo Online.

2. WHO IS THE RESPONSIBLE PARTY?

- 2.1. Responsible party means a public or private body or other person which, alone or in conjunction with others, determines the purpose of and means for Processing of personal information.
- 2.2. Adumo Online (Pty) Limited
Registration number: 2006/018060/07
Unit 207, Block 2, Northgate Park
Cnr Section Street and Platinum drive
Brooklyn
Western Cape
7405.
- 2.3. When a merchant uses a solution of any of our alternative service providers/third-party solution providers, the responsible party will be the company which the customer engages to take up the solution, acting jointly with Adumo Online. It will be clear to the merchant from the Merchant Agreement they enter into in respect of the solution, who the responsible party is. This Notice also applies in respect of personal information processed by such alternative service providers/third-party solution providers in respect of the solution chosen by the merchant and provided by Adumo Online in conjunction with our alternative service provider/third-party solution providers.

3. WHAT IS PERSONAL INFORMATION?

- 3.1 Personal information means any information that identifies a merchant (who can be a natural or a juristic person) or specifically relates to a merchant.
- 3.2 Personal information includes, but is not limited to the following information about a merchant:
 - 3.2.1 name;
 - 3.2.2 marital status (e.g. married, single, divorced); national origin; age; language; birth; education;
 - 3.2.3 financial history (e.g. income, expenses, obligations, assets and liabilities, money management behaviour or goals and needs based on amongst others, account transactions, including banking account information provided to Adumo Online);
 - 3.2.4 gender or sex (e.g. for statistical purposes as required by the law);
 - 3.2.5 national origin;
 - 3.2.6 age;
 - 3.2.7 language;
 - 3.2.8 birth;
 - 3.2.9 education;
 - 3.2.10 criminal history;
 - 3.2.11 identifying number (e.g. account number, identity number, passport number, registration number, VAT number, tax number);
 - 3.2.12 contact information (e.g. e-mail address; physical address, residential address, work address, telephone number);
 - 3.2.13 information about the merchant's location (e.g. geolocation or GPS location);
 - 3.2.14 online and other unique identifiers; social media profiles;
 - 3.2.15 biometric information (e.g. fingerprints, signature, voice- and facial recognition);
 - 3.2.16 race (e.g. for statistical purposes as required by the law);
 - 3.2.17 physical health; mental health; wellbeing; disability; religion; belief; conscience; culture;
 - 3.2.18 medical history (e.g. HIV/AIDS status); criminal history;
 - 3.2.19 personal views, preferences and opinions;
 - 3.2.20 confidential correspondence; and
 - 3.2.21 another's views or opinions about a merchant and a merchant's name also constitute personal information.

4. HOW ADUMO ONLINE PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON?

- 4.1 If a merchant is a juristic person, Adumo Online may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, sureties, other security providers and other persons related to the juristic person. These are a juristic merchants' related persons.
- 4.2 If the merchant provides Adumo Online with its related persons' personal information, the merchant warrants that the related persons are aware of and have consented to the sharing and processing of their personal information with Adumo Online. Adumo Online will process the personal information of related persons as stated in this Notice and references to "merchant" will include related persons (with the necessary amendments).

5. WHAT IS SPECIAL PERSONAL INFORMATION?

- 5.1 There is also a category of personal information called special personal information, which includes the following personal information about a merchant:
 - 5.1.1 religious and philosophical beliefs (e.g. used where a merchant enters a competition and is requested to express a philosophical view);
 - 5.1.2 race or ethnic origin (e.g. used when performing risk management and for statistical purposes);
 - 5.1.3 trade union membership;
 - 5.1.4 political beliefs;

- 5.1.5 health including physical or mental health, disability and medical history;
- 5.1.6 biometric information (e.g. used to verify a merchant's identity);
- 5.1.7 criminal behaviour, to the extent that such information relates to the alleged commission of an offence, or any proceedings in respect of any offence allegedly committed by a merchant (e.g. used to prevent money laundering as required by law, or when entering into an agreement with Adumo Online).

6. WHEN AND HOW DOES ADUMO ONLINE OBTAIN MERCHANTS' PERSONAL INFORMATION?

- 6.1 Adumo Online collects personal information about merchants:
 - 6.1.1 directly from merchants;
 - 6.1.2 based on merchants' use of Adumo Online solutions or applicable service channels (such as Adumo Online website and applications), Adumo Online advertising, marketing and public messaging;
 - 6.1.3 based on how merchants engage or interact with Adumo Online, such as on social media, and through emails, letters, telephone calls and surveys;
 - 6.1.4 based on a merchant's relationship with Adumo Online;
 - 6.1.5 from public sources (such as newspapers, company registers, online search engines, public posts on social media);
 - 6.1.6 from third parties that Adumo Online interacts with for the purpose of conducting its business (such as partners, reward partners, list providers, credit bureaux, regulators and government departments or service providers).
- 6.2 Adumo Online collects and processes merchants' personal information at the start of, and for the duration of their relationship with Adumo Online. Adumo Online may also process merchants' personal information when their relationship with Adumo Online has ended;
- 6.3 If the law requires Adumo Online to do so, it will ask for the merchant's consent before collecting personal information about the merchant from third parties.
- 6.4 The third parties (which may include parties Adumo Online engages with as independent responsible parties, joint responsible parties or operators) from whom Adumo Online may collect merchants' personal information include, but are not limited to, the following:
 - 6.4.1 members of Adumo Online, any connected companies, subsidiary companies, its associates, cessionaries, delegates, assignees, affiliates or successors in title and/or appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Notice;
 - 6.4.2 appointed third parties (such as its authorised agents, partners, contractors, alternative service providers, third-party solution providers and suppliers) for any of the purposes identified in this Notice;
 - 6.4.3 attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
 - 6.4.4 payment processing services providers, merchants, banks and other persons that assist with the processing of merchants' payment instructions, such as card scheme providers (i.e. VISA or MasterCard);
 - 6.4.5 law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
 - 6.4.6 regulatory authorities, industry ombudsmen, government departments, and local and international tax authorities;
 - 6.4.7 Mastercard Alert to Control High-risk Merchants ("MATCH");
 - 6.4.8 credit bureaux;
 - 6.4.9 qualification information providers;
 - 6.4.10 trustees, executors or curators appointed by a court of law;
 - 6.4.11 courts of law or tribunals;
 - 6.4.12 participating partners, whether retail or online

- 6.4.13 Adumo Online's joint venture partners;
- 6.4.14 marketing list providers;
- 6.4.15 social media platforms;
- 6.4.16 online search engine providers.

7. WHY ADUMO ONLINE NEEDS TO PROCESS MERCHANTS' PERSONAL INFORMATION?

7.1 Adumo Online may process merchants' personal information for the reasons outlined below.

7.2 **Contract:** Adumo Online may process merchants' personal information if it is necessary to conclude or perform under a contract entered into with the merchant in respect of a solution, for example:

- 7.2.1 to assess and process applications for solutions;
- 7.2.2 to conduct affordability assessments;
- 7.2.3 to provide a merchant with solutions they have requested;
- 7.2.4 to open, manage and maintain merchant's profiles and relationships with Adumo Online;
- 7.2.5 to enable Adumo Online to deliver goods, documents or notices to merchants;
- 7.2.6 to communicate with merchants and carry out merchant instructions and requests;
- 7.2.7 to respond to merchant enquiries and complaints;
- 7.2.8 to enforce and collect on any agreement when a merchant is in default or breach of the terms of the agreement, tracing a merchant, and to institute legal proceedings against a merchant. In such scenario Adumo Online may aggregate the contact details provided to any of the companies in the Adumo Group to determine the merchant's most accurate contact details in order to enforce or collect on any agreement the merchant has with Adumo Online;
- 7.2.9 to disclose and obtain personal information from credit bureaux regarding a merchant's credit history and to meet record-keeping obligations;
- 7.2.10 to disclose and obtain personal information from MATCH regarding a merchant's fraud history;
- 7.2.11 to conduct market and behavioural research, including scoring and analysis to determine if a merchant qualifies for solutions, or to determine a merchant's credit and fraud risk;
- 7.2.12 to enable merchants to participate in and make use of value-added solutions;
- 7.2.13 for merchant satisfaction surveys, promotional and other competitions;
- 7.2.14 for security and identity verification, and to check the accuracy of merchant personal information;
- 7.2.15 for any other related purposes.

7.3 **Law:** Adumo Online may process merchants' personal information if the law requires or permits it, for example:

- 7.3.1 to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules);
- 7.3.2 to comply with voluntary and involuntary codes of conduct and industry agreements;
- 7.3.3 to fulfil reporting requirements and information requests;
- 7.3.4 to route, process and settle transactions;
- 7.3.5 to meet record-keeping obligations;
- 7.3.6 to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening a merchant profile with Adumo Online;
- 7.3.7 to conduct market and behavioural research, including scoring and analysis to determine if a merchant qualifies for solutions, or to determine a merchant's credit and fraud risk;
- 7.3.8 to enable merchants to participate in and make use of value-added solutions;
- 7.3.9 for merchant satisfaction surveys, promotional and other competitions;
- 7.3.10 to conduct affordability and risk assessments
- 7.3.11 to disclose and obtain personal information from credit bureaux regarding a merchant's credit history;
- 7.3.12 to disclose and obtain personal information from MATCH regarding a merchant's fraud history;

- 7.3.13 to develop fraud models and fraud tools;
- 7.3.14 for any other related purposes.
- 7.4 Legitimate interest:**
- 7.4.1 Adumo Online may process merchants' personal information in the daily management of its business and finances to protect Adumo Online's merchants, employees, service providers and assets.
- 7.4.2 Adumo Online may process merchants' personal information to provide them with the most appropriate solutions and to develop and improve solutions and Adumo Online's business.
- 7.4.3 Adumo Online may process a merchant's personal information if it is required to protect or pursue the merchant', Adumo Online's or a third party's legitimate interest. This includes:
 - 7.4.3.1 to develop, implement, monitor and improve Adumo Online's business processes, policies and systems;
 - 7.4.3.2 to manage business continuity and emergencies;
 - 7.4.3.3 to protect and enforce Adumo Online's rights and remedies in the law;
 - 7.4.3.4 to develop, test and improve solutions for merchants, this may include connecting the merchant's personal information with other personal information obtained from third parties or public records to better understand merchant needs and develop solutions that meet the merchant's needs. Adumo Online may also consider merchant actions, behaviour, preferences, expectations, feedback and financial history;
 - 7.4.3.5 tailoring solutions which would include consideration of a merchant's use of third-party products and/or services;
 - 7.4.3.6 to market Adumo Online solutions to merchants via various means including on Adumo Online and other websites, mobile apps and social media;
 - 7.4.3.7 to respond to merchant enquiries and communications including the recording of engagements and analysing the quality of Adumo Online's engagements with a merchant;
 - 7.4.3.8 to respond to complaints including analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate;
 - 7.4.3.9 to enforce and collect on any agreement when a merchant is in default or breach of the terms and conditions of the agreement, tracing the merchant, and to institute legal proceedings against the merchant. In such a scenario, Adumo Online may aggregate the contact details provided to any of the companies in the Adumo Group to determine the merchant's most accurate contact details in order to enforce or collect on any agreement the merchant has with Adumo Online;
 - 7.4.3.10 to process, route and settle transactions;
 - 7.4.3.11 to meet record-keeping obligations;
 - 7.4.3.12 to fulfil reporting requirements and information requests;
 - 7.4.3.13 to comply with voluntary and involuntary codes of conduct and industry agreements;
 - 7.4.3.14 to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening a merchant facility with Adumo Online. This may also include the monitoring of our buildings including CCTV cameras and access control;
 - 7.4.3.15 to conduct market and behavioural research, including scoring and analysis to determine if a merchant qualifies for solutions, or to determine a merchant's fraud and credit risk;
 - 7.4.3.16 for statistical purposes, such as market segmentation or merchant segments (that is placing merchants in groups with similar merchants based on their personal information);
 - 7.4.3.17 for merchant satisfaction surveys, promotional and other competitions;
 - 7.4.3.18 to disclose and obtain personal information from credit bureaux regarding a merchant's credit history;
 - 7.4.3.19 to disclose and obtain personal information from MATCH regarding a merchant's fraud history;
 - 7.4.3.20 for any other related purposes.

8. WHY ADUMO ONLINE FURTHER USES OR PROCESSES MERCHANTS' PERSONAL INFORMATION?

- 8.1 At the time that Adumo Online collects personal information from a merchant, it will have a reason or purpose to collect that personal information. Adumo Online may use that same personal information for other purposes. Adumo Online will only do this where the law allows it to, and where the purpose of further processing is compatible with the original purpose(s) when Adumo Online collected the merchant's personal information.
- 8.2 Adumo Online may need to request a merchant's specific consent for the further processing in limited circumstances.
- 8.3 Adumo Online may further use or process a merchant's personal information if:
- 8.3.1 the personal information about the merchant was obtained from a public record, like the deed's registry;
- 8.3.2 the merchant made the personal information public, like posting on social media;
- 8.3.3 the personal information is used for historical, statistical or research purposes, the results will not identify the merchant;
- 8.3.4 proceedings have started or are contemplated in a court or tribunal;
- 8.3.5 it is in the interest of national security;
- 8.3.6 It is required to enable Adumo Online to adhere to the law, specifically tax legislation;
- 8.3.7 the Information Regulator has exempted the processing.
- 8.4 Adumo Online may also further use or process a merchant's personal information if the merchant has consented to it or in the instance of a child, a competent person has consented to it.
- 8.5 Any enquiries about the further processing of merchant personal information can be made through the contact details of the merchant's solution provider, as set out under responsible parties in clause 2 of this Notice.

9. WHEN WILL ADUMO ONLINE PROCESS YOUR PERSONAL INFORMATION?

- 9.1 Adumo Online may process merchants' personal information for lawful purposes relating to its business if the following circumstances apply:
- 9.1.1 it is necessary to conclude a contract or perform under a contract entered into with the merchant;
- 9.1.2 to provide the solution to the merchant;
- 9.1.3 if the law requires or permits it;
- 9.1.4 to protect or pursue a merchant's, Adumo Online's or a third party's legitimate interest;
- 9.1.5 if the merchant has consented to Adumo Online processing its personal information.
- 9.1.6 if a person legally authorised by the merchant, the law or a court, has consented to Adumo Online processing the merchant's personal information;
- 9.1.7 if the merchant is a child and a competent person (such as a parent or guardian) has consented to Adumo Online processing personal information on the merchant's behalf.

10. WHEN WILL ADUMO ONLINE PROCESS MERCHANTS' SPECIAL PERSONAL INFORMATION?

- 10.1 Adumo Online may process merchants' special personal information in the following circumstances, among others:
- 10.1.1 if the processing is needed to create, use or protect a right or obligation in law;
- 10.1.1.1 criminal behaviour, to the extent that such information relates to the alleged commission of an offence, or any proceedings in respect of any offence allegedly committed by a merchant (e.g. used to prevent money laundering as required by law, or when entering into a business relationship with Adumo Online);
- 10.1.1.2 biometric information (e.g. to verify identity when entering premises).
- 10.1.1.3 religious and philosophical beliefs (e.g. where a merchant enters a competition and is requested to express a philosophical view);
- 10.1.2 if the processing is for statistical or research purposes, and all legal conditions are met;

- 10.1.3 if the special personal information was made public by the merchant;
- 10.1.4 if the processing is required by law;
- 10.1.5 if racial information is processed and the processing is required to identify the merchant;
- 10.1.6 if the merchant has consented to the processing.

11. CENTRALISED PROCESSING

- 11.1 Adumo Online aims to create efficiencies in the way it processes information across the Adumo Group. The merchant's personal information may therefore be processed through centralised functions and systems, which includes the housing of the merchant's personal information in a centralised group data warehouse which is accessible by Adumo Online affiliates.
- 11.2 This centralised processing is structured to ensure efficient processing that benefits the merchant and Adumo Online.

12. HOW DOES ADUMO ONLINE USE MERCHANTS' PERSONAL INFORMATION FOR MARKETING?

- 12.1 Adumo Online will use merchants' personal information to market services, products, payment and other related payment solutions to merchants.
- 12.2 Adumo Online may also market non-payment solutions to merchants.
- 12.3 Adumo Online will do this in person, by post, telephone, or electronic channels such as SMS, email, social media and Adumo Online's website.
- 12.4 If a merchant is not a Adumo Online merchant, or in any other instances where the law requires, Adumo Online will only market to them by electronic communications with their consent.
- 12.5 In all cases, a merchant can request Adumo Online to stop sending marketing communications to them at any time.

13. WHEN WILL ADUMO ONLINE USE MERCHANTS' PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS ABOUT THE MERCHANTS'?

- 13.1 An automated decision is made when a merchant's personal information is analysed without human intervention in that decision-making process.
- 13.2 Adumo Online may use a merchant's personal information to make an automated decision as allowed by the law.
- 13.3 An example of automated decision making is the approval or declining of an application when a merchant applies for a solution.
- 13.4 Merchants have the right to query any such decisions made, and Adumo Online will provide reasons for the decisions as far as reasonably possible.

14. WHEN, HOW, AND WITH WHOM DOES ADUMO ONLINE SHARE MERCHANTS' PERSONAL INFORMATION?

- 14.1 In general, Adumo Online will only share merchants' personal information if any one of the following applies:
 - 14.1.1 if the merchant has consented;
 - 14.1.2 if it is necessary to conclude or perform under a contract entered into with the merchant;
 - 14.1.3 if the law requires it;
 - 14.1.4 if it is necessary to protect or pursue the merchant's, Adumo Online's or a third party's legitimate interest;
- 14.2 Where required, Adumo Online may share merchants' personal information with the following persons, which may include parties that Adumo Online engages with as independent responsible parties, joint responsible parties or operators. These persons have an obligation to keep merchants' personal information secure and confidential:
 - 14.2.1 members of Adumo Online, any connected companies, subsidiary companies, associates, cessionaries, delegates, assignees, affiliates or successors in title for any of the purposes identified in this Notice;

- 14.2.2 appointed third parties (such as its authorised agents, partners, contractors, alternative service providers, third-party solution providers and suppliers) for any of the purposes identified in this Notice. Adumo Online will disclose the names of the third parties in the Merchant Agreement;
- 14.2.3 Adumo Online's employees subject to their employment conditions;
- 14.2.4 the merchant's spouse, dependants, partners, employer, joint applicant and other similar sources;
- 14.2.5 people the merchant has authorised to obtain their personal information, such as the merchant's bank;
- 14.2.6 attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- 14.2.7 payment processing services providers, card schemes, banks and other persons that enables or assist with the processing of transactions routing, reconciliation, authorisation and settlement requests and the enablement of the solution;
- 14.2.8 law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
- 14.2.9 regulatory authorities, industry ombudsmen, government departments, local and international tax authorities and other persons as required in terms of law;
- 14.2.10 credit bureaux;
- 14.2.11 MATCH;
- 14.2.12 fraud investigators;
- 14.2.13 qualification information providers;
- 14.2.14 trustees, executors or curators appointed by a court of law;
- 14.2.15 persons to whom Adumo Online have ceded its rights or delegated its obligations to under agreements;
- 14.2.16 courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- 14.2.17 the general public, where merchants submit content to social media sites such as business's Facebook page etc;
- 14.2.18 Adumo Online's joint venture partners with which it has concluded agreements.

15. UNDER WHAT CIRCUMSTANCES WILL ADUMO ONLINE TRANSFER MERCHANTS' PERSONAL INFORMATION TO OTHER COUNTRIES?

- 15.1 Adumo Online will only transfer a merchant's personal information to third parties in another country in any one or more of the following circumstances:
 - 15.1.1 where a merchant's personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient;
 - 15.1.2 where the transfer is necessary to enter into, or perform under a contract with the merchant or a contract with a third party that is in the merchant's interest;
 - 15.1.3 where the merchant has consented to the transfer;
 - 15.1.4 where it is not reasonably practical to obtain the merchant's consent, but the transfer is in the merchant's interest. This transfer will happen within the requirements and safeguards of applicable laws or privacy rules that bind Adumo Online.
- 15.2 The party processing a merchant's personal information in another country will agree to apply the same level of protection as available by law in the merchant's country, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.
- 15.3 An example of Adumo Online transferring a merchant's personal information to another country would be when a foreign customer makes payments with a foreign payment instrument for products and/or services purchased in South Africa.

16. WHAT ARE MERCHANTS' DUTIES AND RIGHTS TO PERSONAL INFORMATION THAT ADUMO ONLINE HAS?

- 16.1 Merchants must provide Adumo Online with proof of identity when enforcing the rights below.
- 16.2 Merchants must inform Adumo Online when their personal information changes, in accordance with the terms of the agreement entered into with Adumo Online.
- 16.3 Merchants warrant that when they provide Adumo Online with personal information of their spouse, dependants or any other person, they have permission from that specific person to share their personal information with Adumo Online. Adumo Online will process the personal information of the merchant's spouse, dependent or any other person which the merchant has shared with Adumo Online as stated in this Notice.

16.4 Right to access

- 16.4.1 Merchants have the right to request access to the personal information Adumo Online has about them, by contacting Adumo Online. This includes requesting:
 - 16.4.1.1 confirmation that Adumo Online holds the merchant's personal information;
 - 16.4.1.2 a copy or description of the record containing the merchant's personal information; and
 - 16.4.1.3 the identity or categories of third parties who have had access to the merchant's personal information.
- 16.4.2 Adumo Online will attend to requests for access to personal information within a reasonable time. Merchants may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. Adumo Online will inform merchants of the fee before attending to their request.
- 16.4.3 Merchants should note that the law may limit their right to access information. Please refer to Adumo Online's information manual prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (information manual) for further information on how merchants can give effect to this right. The information manual is available on Adumo Online's website at: www.adumoonline.com

16.5 Right to correction, deletion or destruction

- 16.5.1 Merchants have the right to request Adumo Online to correct, delete or destroy the personal information it has about them if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if Adumo Online is no longer authorised to keep it. Merchants must inform Adumo Online of their request in the prescribed form or in accordance with the agreement entered into with Adumo Online. Prescribed form 2 has been included as an annexure to this Notice.
- 16.5.2 Adumo Online will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on Adumo Online's systems. Adumo Online may request documents from the merchant to verify the change in personal information.
- 16.5.3 If the law requires Adumo Online to keep the personal information, it will not be deleted or destroyed upon the merchant's request. The deletion or destruction of certain personal information may lead to the termination of a merchant's business relationship with Adumo Online.

16.6 Right to objection

- 16.6.1 Merchants may object on reasonable grounds to the processing of their personal information where it is in their legitimate interest or in the legitimate interest of another party.
- 16.6.2 Merchants must inform Adumo Online of their objection in the prescribed form. Prescribed form 1 is included as an annexure to this Notice.
- 16.6.3 Adumo Online will not be able to give effect to the merchant's objection if the processing of their personal information was and is permitted by law, the merchant has provided consent to the processing and Adumo Online's processing was conducted in line with their consent; or the processing is necessary to conclude or perform under a contract with the merchant.
- 16.6.4 Adumo Online will also not be able to give effect to a merchant's objection if the objection is not based upon reasonable grounds and substantiated with appropriate evidence.

16.6.5 Adumo Online will provide merchants with feedback regarding their objections.

16.7 Right to withdraw consent

16.7.1 Where a merchant has provided their consent for the processing of their personal information, the merchant may withdraw their consent. If they withdraw their consent, Adumo Online will explain the consequences to the merchant, which may include that Adumo Online may not be able to provide certain solutions to the merchant. Adumo Online will inform the merchant if this is the case. Adumo Online may proceed to process merchants' personal information, even if they have withdrawn their consent, if the law permits or requires it. It may take a reasonable time for the change to reflect on Adumo Online systems. During this time, Adumo Online may still process the merchant's personal information.

16.7.2 Merchants can give effect to this right by contacting us on support@adumoonline.com or informationofficer@adumoonline.com, and 021 555 3260.

16.8 Right to complain

16.8.1 If you have a concern or complaint, please raise the complaint with Adumo Online directly and we will do our best to address your complaint.

16.8.2 To log a complaint please contact us on support@adumoonline.com or informationofficer@adumoonline.com. We will investigate the matter and revert to you.

16.8.3 If we do not resolve your complaint, you have a right to file or escalate the complaint to the Information Regulator.

16.8.4 The contact details of the Information Regulator are:

Information Regulator (South Africa):

Physical Address:

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Postal Address:

P.O Box 31533
Johannesburg
2017

Website: <https://justice.gov.za/inforeg/>

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za

17. HOW ADUMO ONLINE SECURES MERCHANTS' PERSONAL INFORMATION?

17.1 Adumo Online will take appropriate and reasonable technical and organisational steps to protect merchants' personal information in line with industry best practices. Adumo Online's security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable. This includes the following:

17.1.1 keeping Adumo Online systems secure (such as monitoring access and usage);

17.1.2 storing Adumo Online records securely;

17.1.3 controlling the access to Adumo Online premises, systems and/or records;

17.1.4 safely destroying or deleting records.

18. HOW LONG DOES ADUMO ONLINE KEEP MERCHANTS' PERSONAL INFORMATION?

18.1 Adumo Online will keep merchants' personal information for as long as:

18.1.1 the law requires Adumo Online to keep it;

18.1.2 a contract between the merchant and Adumo Online requires Adumo Online to keep it;

18.1.3 the merchant has consented to Adumo Online keeping it;

18.1.4 Adumo Online is required to keep it to achieve the purposes listed in this Notice;

18.1.5 Adumo Online requires it for statistical or research purposes;

18.1.6 a code of conduct requires Adumo Online to keep it;

18.1.7 Adumo Online requires it for lawful business purposes.

18.2 TAKE NOTE: Adumo Online may keep merchants' personal information even if they no longer have a relationship with Adumo Online if the law permits or requires.

19. HOW ADUMO ONLINE DEALS WITH COOKIES?

- 19.1 A cookie is a small piece of data that is sent (usually in the form of a text file) from a website to the merchant's device, such as a computer, smartphone or tablet. The purpose of a cookie is to provide a reliable mechanism to "remember" merchant behaviour (keeping track of previous actions), e.g. remembering the contents of an online shopping cart, and actions the user performed whilst browsing when not signed up or logged into their online account.
- 19.2 Adumo Online does not necessarily know the identity of the merchant of the device but does see the behaviour recorded on the device. Multiple merchants of the same device would not necessarily be distinguishable from one another.
- 19.3 Cookies could, however, be used to identify the device and, if the device is linked to a specific merchant, the merchant would also be identifiable.
- 19.4 By using the Adumo Online's website or applications, merchants agree that cookies may be forwarded from the relevant website or application to their computer or device. The cookie will enable Adumo Online to know that a merchant has visited a website or application before and will identify the Customer. Adumo Online may also use the cookie to prevent fraud.
- 19.5 Please refer to Adumo Online cookie notice for further information. Adumo Online's cookie notice is available on Adumo Online website at: www.adumoonline.com

20. ANNEXURES

20.1 FORM 2: attached below marked "FORM 2".

- 20.1.1 REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3].

20.2 FORM 1: attached below marked "FORM 1".

- 20.2.1 OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2].

FORM 1:



POPIA_ Form 1.pdf

FORM 2:



POPIA_Form 2.pdf