

DATA PROTECTION POLICY

for

MAVEN SOLUTIONS

1. Preamble

- 1.1. The purpose of this Data Protection Policy is to provide Maven Solutions Clients with information on how it processes, handles and stores their personal information, as a data Controller and as a data processor. Maven Solutions values its Client's privacy and security and is committed to protecting it. Maven Solutions undertakes to comply with the legal standards governing its Clients, namely the General Data Protection Regulation of the (EU) 2016/679 ("the **GDPR**") and the Protection of Personal Information Act 4 of 2013 ("**POPIA**").
- 1.2. This Policy seeks to ensure that Maven Solutions (i) complies with international legal standards and best practice for the receipt, importing, processing, handling and storing of personal data of individuals, both as received from its Clients, and as held in respect of its employees;(ii) protects the rights of its employees, as well as that of its Clients and third parties in respect of individuals' data; (iii) transparently communicates how it processes, handles and stores individuals' data; and protects itself from the risks of a personal data breach.
- 1.3. In adopting this Policy, Maven Solutions wishes to balance its legitimate business interests and its Clients' reasonable expectation of privacy. Accordingly, Maven Solutions will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your Personal Information.
- 1.4. The rules and standards set out in this Policy apply regardless of whether personal data relates to a Client or an Employee of Maven Solutions, and/or is stored electronically, digitally, on paper, or other materials, or through other methods.

2. Interpretation and Definitions

In this Policy-

- 2.1 the headings are for convenience and shall be disregarded in construing this Policy;

- 2.2 unless the context indicates a contrary intention, the singular shall include plural and vice versa;
- 2.3 a natural person includes a juristic person and vice versa;
- 2.4 where any term is defined within a particular clause other than this clause 2, the term so defined shall bear the meaning ascribed to it in that clause wherever it is used in this Policy, unless it is clear from the clause in question that such a defined term has limited application to the relevant clause;
- 2.5 any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as amended or substituted from time to time; and
- 2.5.1 Unless the context clearly indicates a contrary intention, the following expressions shall bear the meanings set opposite them below and cognate expressions shall bear corresponding meanings:
- 2.5.2 “**Client**” means any natural or legal person to whom Maven Solutions provides a service or benefit and includes any Prospective Client;
- 2.5.3 “**Consent**” means a Client’s voluntary, specific and informed indication of its wishes by a statement or an affirmative action, which signifies its agreement to the processing of its Personal Information, as defined in Section 1 of the POPIA and Article 4 of the GDPR, whichever is applicable under the circumstances;
- 2.5.4 “**Data Subject**” means the person to whom the Personal Information relates, as defined in Section 1 of the POPIA and Article 4 of the GDPR, whichever is applicable under the circumstances;
- 2.5.5 “**DPO**” means a (i) Data Protection Officer as defined in Articles 37 to 39 of the GDPR; (ii) an Information Officer, as defined in section 1 of the POPIA, whichever is applicable under the circumstances;
- 2.5.6 “**Maven Solutions**” means Knoesen Consulting (Proprietary) Limited trading as Maven Solutions a private company registered in accordance with the laws of South Africa under registration number: 2016/478376/07;

- 2.5.7 “**Personal Data/Information**” means information which relates to an identified or identifiable natural person, and where applicable, an identifiable, existing juristic person, in particular by reference to an identifier factor such as a name, identification number, location data, online identifiers or other specific factors such as physical, physiological, genetic, mental, economic, cultural or social identity of a natural person, as defined in Section 1 of the POPIA and Article 4 of the GDPR, whichever is applicable under the circumstances;
- 2.5.8 “**Policy**” means this data protection policy and addendums thereto;
- 2.5.9 “**Processing**” means any operation or set of operations performed on Personal Information or sets of Personal Information, as defined in Article 4 of the GDPR and Section 1 of the POPIA, whichever is applicable under the circumstances;
- 2.5.10 “**Prospective Client**” means any natural or legal person to which Maven Solutions has provided or from which Maven received a proposal, bid or written inquiry regarding the possible performance of services by the company;
- 2.5.11 “**Recipient**” means a natural or legal person, public authority, agency or another body, to which the Personal Information is disclosed, whether a third party or not; and
- 2.5.12 “**Regulatory Authority**” means the Information Regulator established in terms of section 39 of POPIA.

3. Personal Information collected and processed

- 3.1 The types of Personal Information that we may collect and process includes information necessary for Maven Solutions legitimate business interests and the categories of Personal Information defined in POPIA and GDPR. This may include (amongst other things):
- 3.1.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the Data Subject;
- 3.1.2 information relating to the education or the medical, financial, criminal or employment history of the Data Subject;



- 3.1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the;
 - 3.1.4 the biometric information of the Data Subject;
 - 3.1.5 correspondence sent by a Data Subject that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 3.1.6 data and/or information relating to a Data Subject received from a Client in the course of providing services to such Client;
 - 3.1.7 the name of the Data Subject if it appears with other Personal Information relating to the Data Subject or if the disclosure of the name itself would reveal information about the Data Subject;
 - 3.1.8 the pages of the website viewed by you.
- 3.2 Maven Solutions limits the types of Personal Information it processes to only that to which the Clients has given their consent and which is necessary for the company's legitimate business activities.

4. Processing the Personal Information

- 4.1 Personal Information may be processed when:
 - 4.1.1 it is given by Clients during active business discussions or negotiations including any such discussions or negotiations relating to the possible performance of services by Maven or any of its affiliates at any time;
 - 4.1.2 Maven Solutions renders or provides services to Clients;
 - 4.1.3 Clients complete the relevant contact forms on Maven Solutions website; and
 - 4.1.4 Clients browse the website.
- 4.2 The Clients acknowledge and consent that all Personal Information processed by Maven Solutions may be stored by Maven Solutions.

5. How Maven Solutions uses the Personal Information

- 5.1 The information collected from Clients will be used in a:
- 5.1.1 fair, lawful and non-excessive manner in accordance with the legal standard applicable to such information;{
 - 5.1.2 only with the informed consent of the Data Subject and/or
 - 5.1.3 only for our legitimate business interest (contractual necessity) and/or explicitly defined reasons as part of the services provided by Maven
- 5.2 Where Personal information may be processed in order to comply with applicable laws and regulatory obligations, such as those relating to anti-money laundering and anti-terrorism, to comply with legal process and to respond to requests from public and governmental authorities.

6. Sharing of Personal Information

- 6.1 As stated above, Maven Solutions will keep Clients Personal Information secure and confidential pursuant to the regulations in force and to ensure that all Recipients have appropriate security and confidentiality safeguards.
- 6.2 Recipients are authorised to use Clients Personal Information required to perform their function (i.e. authorised personnel, agents, advisers, service providers and suppliers), but are not permitted to use or disclose the Personal Information for any other purpose unless the Client specifically consents thereto.
- 6.3 Maven Solutions will not sell, rent or lease the Client's Personal Information obtained without consent. In the event of a transfer of Maven Solutions or its assets, the Clients' Personal Information may be transferred as part of an acquisition, merger or reorganisation. Maven Solutions will endeavour to require any successor company to maintain this Policy but Maven Solutions cannot guarantee that it will remain in effect after such corporate action. Maven Solutions may share Clients' Personal Information with its affiliated or group companies for the purposes contemplated herein.
- 6.4 Maven Solutions shall be entitled to share the Clients' Personal Information with its legal counsel and/or agencies acting on behalf of legal counsel for any legal procedure in enforcing Maven Solutions and/or a Client's rights.

- 6.5 All employees of Maven Solutions shall continually be responsible for ensuring the safeguarding, protection and avoidance of any unauthorised disclosure or breach of data Personal Information in the execution of employment duties and services to Maven Solutions, or otherwise in the course of rendering services or being associated with the company.

7. Aggregated Information

Maven Solutions may share aggregated, non-personally identifiable information, such as demographics and website usage statistics, with advertisers, sponsors and other organisations.

8. Maintenance and Storage of Information

- 8.1 Maven Solutions may retain Client information for a reasonable period for achieving the purpose for which the information was collected and/or subsequently processed and is entitled to retain the Personal Information of the Client for as long as is legally required.
- 8.2 Client information will be protected from unauthorised access, accidental deletion or any risk of exposure to malicious hacking attempts and stored on servers which are exclusively used and or owned and maintained by or on behalf of Maven Solutions
- 8.3 Clients shall be entitled to request correction of the Personal Information and deletion of any Personal Information being retained by Maven Solutions provided that such deletion will not affect the rendering of the Services by Maven Solutions and that such deletion is permitted in terms of the applicable laws.

9. Security

- 9.1 Maven Solutions shall adopt reasonable security procedures to help prevent unauthorised access to all Clients' information. Maven Solutions shall not be liable for any attempt to hack or crack or otherwise gain unauthorised access to any of the Clients' information and the Clients will not hold Maven Solutions liable for any loss or damage sustained by it as a result thereof.
- 9.2 Maven Solutions cares about Personal Information protection and makes its employees aware of Personal Information security.

10. Rights of Data Subjects

- 10.1 Data Subjects have the right to its Personal Information processed in accordance with the conditions for the lawful processing of Personal Information as referred to in POPIA which includes the right to:
 - 10.1.1 be notified that the information is being collected, accessed and/or acquired by an unauthorised person;
 - 10.1.2 request, where necessary, the correction, destruction or deletion of its Personal Information;
 - 10.1.3 object to the Processing of its Personal Information at any time;
 - 10.1.4 not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of his, her or its Personal Information intended to provide a profile of such person;
- 10.2 Data Subjects have the right to submit a complaint to the Regulatory Authority regarding an alleged interference with the protection of Personal Information processed in accordance with this Policy.
- 10.3 Data Subjects have the right to institute civil proceedings regarding an alleged interference with the protection of your Personal Information processed in accordance with these terms.

11. Breach by an Employee

- 11.1 A breach of the provisions of this Policy may form the basis of disciplinary action. In appropriate circumstances, such breach, if proven in a disciplinary enquiry may lead to dismissal.
- 11.2 The imposition of any disciplinary sanction or dismissal shall not preclude the company from instituting civil proceedings against an Employee who acted in breach of this Policy where such breach has resulted in liability, loss, reputational damage and/or other damages to the company in the course of pursuing its commercial operations.

12. **Amendments to the Policy**

This Policy may be amended by Maven Solutions management from time to time.

13. **Governing Law**

This Policy is governed by the law of the Republic of South Africa. Any proceedings arising from this Policy shall be instituted in the appropriate court in South Africa and all Clients submit to the exclusive jurisdiction of the courts of South Africa.

14. **Effective Date**

This Policy shall come into effect on the date of approval and shall repeal previous Maven Solutions Policies which are related to Personal Data Protection.

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