

PROTECTION OF PERSONAL INFORMATION ACT – POLICY DOCUMENT

1. COLLECTION OF INFORMATION

1.1. As part of your interactions with AJS Technology Solutions (Pty) Ltd and ACJUSA South Africa (Pty) Ltd (collectively referred to as “**AJS**”), AJS collects various data from you, both by you providing it directly, and automatically from, amongst other things, browsing AJS’s website. Your personal information may also be collected by AJS’s affiliated companies, namely Coleso Legal Technologies (Pty) Ltd, African Call Technology (Pty) Ltd, AVID Active (Pty) Ltd and UTwo Distribution (Pty) Ltd (collectively the “**Group Companies**”). This Policy Document explains how AJS and the Group Companies collect your data and what they can and cannot do with such information.

1.2. Personal information

1.2.1. Personal information includes:

- 1.2.1.1. certain information that AJS and the Group Companies collect automatically when you visit our website;
- 1.2.1.2. certain information collected on registration (see below);
- 1.2.1.3. certain information collected on submission; and
- 1.2.1.4. optional information that you provide to AJS and/or the Group Companies voluntarily (see below);

but excludes:

- 1.2.1.5. information that has been made anonymous so that it does not identify a specific person;
- 1.2.1.6. permanently de-identified information that does not relate or cannot be traced back to you specifically;
- 1.2.1.7. non-personal statistical information collected and compiled by AJS and/or the Group Companies; and
- 1.2.1.8. 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).

1.2.2. Sensitive personal information

Depending on the services required, AJS and the Group Companies may also collect sensitive personal information including your:

- 1.2.2.1. financial information – such as your bank account details;
- 1.2.2.2. biometric information – such as images of your face or fingerprints; and
- 1.2.2.3. historical conduct –such as payment defaults and credit bureau listings.

1.3. From Browsers

AJS and the Group Companies automatically receive and record internet usage information on their 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 AJS's website might place personal information within your URL during a visit to it, and AJS has no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

1.4. Cookies

- 1.4.1. AJS and the Group Companies may place small text files called 'cookies' on your device when you visit this website. These files do not contain personal information, but they do contain a personal identifier allowing AJS and the Group Companies to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- 1.4.1.1. granting you access to age restricted content;
- 1.4.1.2. tailoring our website's functionality to you personally by allowing your preferences to be remembered;
- 1.4.1.3. improving how our website performs;
- 1.4.1.4. allowing third parties to provide services to our website; and
- 1.4.1.5. helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

1.4.2. Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary.

1.5. Third Party Cookies

Some of our business partners use their own cookies or widgets. AJS and the Group Companies have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

1.6. Optional Details

You may also provide additional information to AJS and the Group Companies on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you respond to surveys, order certain additional services, or otherwise use the optional features and functionality of our website.

1.7. Purpose of Collection

1.7.1. AJS and/or the Group Companies may use or process any services information, or optional information that you provide to them for the purposes that you indicated when you agreed to provide it to AJS and/or the Group Companies. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. AJS and the

Group Companies generally collect and process your personal information for various purposes, including:

- 1.7.1.1. services purposes – such as requests for and providing our services;
 - 1.7.1.2. marketing purposes – such as pursuing lawful related marketing activities;
 - 1.7.1.3. business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, other proposed and actual transactions as well the selling of personal information to third-parties in order to enable offerings of related products and services; and
 - 1.7.1.4. legal purposes – such as handling claims, complying with regulations, or pursuing good governance.
- 1.7.2. We may use your usage information for the purposes described above and to:
- 1.7.2.1. remember your information so that you will not have to re-enter it during your visit or the next time you access our website;
 - 1.7.2.2. monitor website usage metrics such as total number of visitors and pages accessed; and
 - 1.7.2.3. track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

1.8. Consent to Collection

- 1.8.1. We will obtain your consent to collect personal information:
 - 1.8.1.1. in accordance with applicable law;
 - 1.8.1.2. when you provide AJS and/or the Group Companies with any registration information or optional information voluntarily.
- 1.8.2. To the extent that you object to AJS and/or either of the Group Companies processing your personal information, you can request that we no longer

process your personal information by completing Form 1 of the regulations relating to the Protection of Personal Information Act 4 of 2013 (as amended) and submitting your form to us via email, alternatively by accessing your account online (if applicable), emailing us, or phoning us, notifying AJS and/or the Group Companies of your objection.

2. **USE**

AJS and the Group Companies may use your personal information to fulfil our obligations and to provide services to you.

3. **DISCLOSURE**

3.1. Sharing

AJS and the Group Companies may share your personal information with:

- 3.1.1. other divisions or companies within the group of companies to which AJS or the Group Companies 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 its policies, and to guide decisions about its products, services, and communications (such divisions or companies will only use this information to send you marketing communications if you have requested their services);
- 3.1.2. an affiliate, in which case we will seek to require the affiliates to honour this privacy policy, and which affiliates will include entities which provide products and services relating to the services which we provide;
- 3.1.3. AJS and the Group Companies' service providers under contract who help provide certain services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these service providers only use your information in connection with the services they supply or services they perform for us and not for their own benefit);
- 3.1.4. credit bureaus to report account information, as permitted by law;

3.1.5. 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

3.1.6. other third parties who provide us with relevant services where appropriate.

3.2. Regulators

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

3.3. Law enforcement

We may disclose personal information if required:

3.3.1. by a subpoena or court order;

3.3.2. to comply with any law;

3.3.3. to protect the safety of any individual or the general public; and

3.3.4. to prevent violation of our customer relationship terms.

3.4. No selling

We will not sell personal information for purposes other than those related to the services which we provide. No personal information will be disclosed to any person, save for any third-party with whom we contract for the purposes of providing products and/or services related to the services provided by AJS and/or the Group Companies, as contemplated in this policy. We will only disclose personal information collected by AJS and the Group Companies during the ordinary course of their business and any third-party will provide similar products and services in the ordinary course of its business, which products and services are closely related.

3.5. Marketing purposes

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

3.6. Employees

AJS and the Group Companies will need to disclose personal information to their employees that require the personal information to do their jobs. These may include

their responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

3.7. Change of ownership

If AJS or either of the Group Companies undergoes a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, AJS or either of the Group Companies may assign their rights to the personal information it processes to a successor, purchaser, or separate entity. AJS or either of the Group Companies will disclose the transfer on their website. If you are concerned about your personal information migrating to a new owner, you may request AJS or either of the Group Companies to delete your personal information.

4. **SECURITY**

4.1. Protocols

We adhere to strict security protocols in respect of data protection laws. Our website and servers are hosted in a secure server environment that uses a firewall in addition to other advanced security measures aimed to prevent any interference or access from unwarranted outside third parties.

4.2. Access

Access to any personal information is only authorised for employees who require such information in order to fulfil their employment responsibilities.

5. **ACCURACY OF INFORMATION**

5.1. We aim to ensure that all personal information collected is accurate, complete and up to date as is necessary for the purposes defined in this policy. In order to maintain accurate information, AJS and/or either of the Group Companies may request that you update your information on our website.

5.2. Updating Information

You are able to review and update any personal information that may be held by us by accessing your account online (if applicable), emailing us, or phoning us, alternatively by completing Form 2 of the regulations relating to the Protection of Personal Information Act 4 of 2013 (as amended) and submitting the completed form to us via email. The identity of any person wishing to update any information is

required to be verified prior to the granting of any access to the respective person's account or making any changes to any personal information.

6. RETENTION OF INFORMATION

6.1. Period of Retention

We will retain personal information for as long as we deem it necessary to do so in order to perform services in the ordinary course of our business, and for as long as retention of the record is required or authorised by law.

6.2. Obligations

During the period of retention, AJS and the Group Companies will continue to abide by all their obligations stipulated in this policy.

6.3. AJS and the Group Companies reserve the right to retain information in physical or electronic records at their discretion.

7. TRANSFER OF INFORMATION

We undertake not to transfer any personal information across any country border without prior written consent.

8. LIMITATION

8.1. Liability

We are not responsible for, give no warranties and makes no representations whatsoever in respect of any privacy policy and/or practice belonging to linked or third-party websites.

9. ENQUIRIES

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

Access to Information Manual

We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (“**PAIA**”).

1. Introduction

ACJUSA (Pty) Ltd and AJS South Africa, together with their group companies, namely: Coleso Legal Technologies (Pty) Ltd, African Call Technology (Pty) Ltd, AVID Active (Pty) Ltd and UTwo Distribution (Pty) Ltd, are the South African distributors for AJS Global Software Products, offering a variety of trusted software applications and software licenses for legal and corporate markets, including but not limited to accounting and bookkeeping management services, collection management solutions and products such as document automation. This is our ‘Access To Information Manual’. Its purpose is to help you access our information and any other information that we have.

PAIA requires us to make it available to you so that you:

- know what types of information we have; and
- can request access to it.

2. Our details

Our details are as follows:

- Entity name: **AJS Technology Solutions Proprietary Limited**
 - Registration number: 2015/0197
 - Physical address: 344 Independent Avenue, Windhoek, Namibia
 - Phone number: +27 (0) 861 265 376 (South Africa) | +27 87 086 6838 (International)
 - Contact email: info@ajs.co.za
 - Website: <https://ajsglobal.com>
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- Entity name: **ACJUSA South Africa Proprietary Limited**
 - Registration number: 2017/125784/07
 - Physical address: 93 North Street, Ferndale, Randburg, 2194

- Information officer: Francois Horn
 - Information officer email: francois@ajs.co.za
 - Contact email: info@ajs.co.za
 - Website: <https://www.ajs.co.za>
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- Entity name: **Coleso Legal Technologies Proprietary Limited**
 - Registration number: 2005/010493/07
 - Physical address: 93 North Street, Ferndale, Randburg, 2194
 - Information officer: Francois Horn
 - Information officer email: francois@ajs.co.za
 - Contact email: info@ajs.co.za
 - Website: <https://www.ajs.co.za>
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- Entity name: **African Call Technology Proprietary Limited**
 - Registration number: 2010/015298/07
 - Physical address: 93 North Street, Ferndale, Randburg, 2194
 - Information officer: Francois Horn
 - Information officer email: francois@ajs.co.za
 - Contact email: info@ajs.co.za
 - Website: <https://www.ajs.co.za>
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- Entity name: **AVID Active Proprietary Limited**
 - Registration number: 2003/029078/07
 - Physical address: 93 North Street, Ferndale, Randburg, 2194
 - Information officer: Francois Horn
 - Information officer email: francois@ajs.co.za
 - Contact email: info@ajs.co.za
 - Website: <https://www.ajs.co.za>
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- Entity name: **UTwo Distribution Proprietary Limited**

- Registration number: 2007/024818/07
 - Physical address: 93 North Street, Ferndale, Randburg, 2194
 - Information officer: Francois Horn
 - Information officer email: francois@ajs.co.za
 - Contact email: info@ajs.co.za
 - Website: <https://www.ajs.co.za>
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3. Further guidance

If you would like further guidance on how you can get access to information under PAIA, you may contact the South African Human Rights Commission (“**SAHRC**”) to find out more information about PAIA. They have a guide in each official language of South Africa on how to exercise any right under PAIA. Their contact details are as follows:

- Phone number: 011 877 3825
- Fax number: 011 403 0625
- Postal address: Private Bag X2700, Houghton, 2041
- Physical address: Braampark Forum 3, 33 Hoofd Street, Braamfontein, Johannesburg
- Website: <http://www.sahrc.org.za/index.php/understanding-paia>

4. Records we hold

We hold the following subjects and categories of records:

- Company records;
- Business records;
- Financial records;
- Insurance records;
- Personnel records;
- Policies and directives;
- Agreements or contracts;

- Regulatory documents;
- Published information;
- Customer information; and
- Reference materials.

4.1. Company records

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

- Memorandum of Incorporation – Automatically available from CIPC
- Directors' names - Automatically available from CIPC
- Documents of incorporation – Automatically available from CIPC
- Minutes of board of directors' meetings – Not automatically available
- Written resolutions - Not automatically available
- Records relating to appointment of directors, auditor, secretary, public officer, or other officers - Not automatically available
- Share register and other statutory registers - Not automatically available
- Other statutory records - Not automatically available

4.2. Business records

Business records include any documents that have economic value to the business.

- Operational records - Not automatically available
- Databases - Not automatically available
- Internal correspondence - Not automatically available
- Product records - Not automatically available

4.3. Financial records

Financial records are all our records related to our finances.

- Financial statements – Not automatically available (NDA required)
- Tax returns - Not automatically available
- Other documents relating to taxation of the company – Not automatically available
- Accounting records – Not automatically available
- Banking records - Not automatically available
- Banking details - Automatically available on request
- Banking details – Not automatically available
- Electronic banking records - Not automatically available
- Paid cheques - Not automatically available
- Asset register - Not automatically available
- Rental agreements - Not automatically available
- Invoices - Not automatically available
- Financial agreements - Not automatically available

4.4. Insurance records

Insurance records are all our records related to our insurable assets.

- Insurance policies held by the company - Not automatically available
- Register of all immovable property owned by the company - Not automatically available

4.5. Income tax records

Income tax records are all our records related to our income tax obligations.

- PAYE Records – Not automatically available
- Corporate tax records - Not automatically available
- Documents issued to employees for income tax purposes - Not automatically available

- Records of payments made to SARS on behalf of employees- Not automatically available
- VAT records - Not automatically available
- Regional Services Levies - Not automatically available
- Skills Development Levies - Not automatically available
- UIF - Not automatically available
- Workmen's Compensation - Not automatically available

4.6. Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

- List of employees – Not automatically available
- Employee personal information - Not automatically available
- Employee employment contracts - Not automatically available
- Employment policies and procedures - Not automatically available
- Employment Equity Plan - Not automatically available
- Medical aid records - Not automatically available
- Pension and provident fund records - Not automatically available
- Salaries of employees – Not automatically available
- Leave records - Not automatically available
- Internal evaluations - Not automatically available
- Disciplinary records - Not automatically available
- Disciplinary codes - Not automatically available
- Training records - Not automatically available
- Operating manuals - Not automatically available
- Personal records provided by personnel - Not automatically available
- Other statutory records - Not automatically available
- Related correspondence - Not automatically available

4.7. Policies and directives

Policies and directives include both internal and external documents.

- Internal relating to employees and the company - Not automatically available
- External relating to donors and other third parties - Not automatically available
- Information technology systems and documents - Not automatically available

4.8. Agreements or contracts

Agreements or contracts include the documents themselves and all related documents.

- Standard Agreements - Not automatically available
- Contracts concluded with customers - Not automatically available
- NDAs - Not automatically available
- Letters of Intent, MOUs - Not automatically available
- Third party contracts - Not automatically available
- Office management contracts - Not automatically available
- Supplier contracts - Not automatically available

4.9. Regulatory documents

Regulatory documents include any documents required to comply with any laws.

- Permits - Not automatically available
- Licences - Not automatically available
- Authorities - Not automatically available

4.10. Published information

Published information includes any document that we prepare and produce.

- External newsletters and circulars - Automatically available
- Internal newsletters and circulars - Not automatically available

- Information on the company published by third parties - Not automatically available

4.11. Customer information

Customer information includes any information about anyone that we provide services to, including our customers, leads, or prospects.

- Customer details - Not Automatically available
- Contact details of individuals within customers - Not automatically available
- Communications with customers - Not automatically available
- Sales records - Automatically available
- Transactional information - Not automatically available
- Marketing records - Not automatically available

4.12. Reference materials

Reference materials include any sources of information that we contribute to.

- Books - Not automatically available
- Newsletters and journals articles -Automatically available
- Magazines - Not automatically available
- Newspaper articles - Not automatically available

5. Information we hold to comply with the law

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997;
- Companies Act 61 of 1973;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Consumer Protection Act 68 of 2008;

- Electronic Communications Act 36 of 2005;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962;
- Labour Relations Act 66 of 1995;
- Occupational Health and Safety Act 85 of 1993;
- Private Security Industry Regulation Act 56 of 2001;
- Protection of Personal Information Act 4 of 2013;
- Skills Development Levies Act 9 of 1999;
- Unemployment Insurance Act 63 of 2001; and
- Value Added Tax Act 89 of 1991.

6. How to request access

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete Form C which is available from:

- the SAHRC website at <http://www.sahrc.org.za/index.php/understanding-paia> at this link: <http://www.sahrc.org.za/home/21/files/Form%20C.doc%20August%202013.doc>; or
- the Department of Justice and Constitutional Development website at www.justice.gov.za at this link: http://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf.

Please submit the completed form to our information officer together with the relevant request fee, details here: <http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf> at our information officer's email address, our physical address, or by fax in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;

- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).
- If you do not use the standard form, we may:
 - reject the request due to lack of procedural compliance;
 - refuse it if you do not provide sufficient information; or
 - delay it.

7. Grounds for refusal

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

8. How we will give you access

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

9. How much it will cost you

You must pay us a request fee as required by law when submitting a request for access to information. The prescribed fees are as set out in the Fee Schedule which is available from <http://www.sahrc.org.za/index.php/understanding-paiaat> this link:

<http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>.

You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

10. How we process and protect personal information

We process the personal information by various methods, but mainly through capturing personal information of customers and sometimes its authorised users, who provide such information when offering our services and products.

10.1. Categories of people

We process the personal information of the following categories of people:

- customers utilising our services and/or products;
- prospects or leads;
- employees;
- recruiters providing services related to employees;
- contractors, vendors, or suppliers;
- debtors and creditors; and
- directors and shareholders.

10.2. Purposes

We process the personal information to:

- supply our services;
- better understand our data subjects' needs when doing so;
- keep our data subject records up-to-date;
- manage employees in general;

- manage supplier contracts in general;
- manage customers in general;
- manage customer credit in general;
- market to customers;
- enforce debts;
- market services to prospects; and
- process customer requests or complaints.

We generally collect and process personal information for our customers for various purposes including:

- to help provide better, more satisfying services to our customers when utilising our products and services;
- to help improve or alter specific or general services provided by us;
- to receive and/or provide feedback from/to customers and our service providers;
- to ensure that our services are paid for and that neither we, our service providers, customers or other clients are defrauded or the victims of illicit activity; or
- better market our services and products.

10.3. Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and ages;
- demographic details, such as races and age groups;
- biometric information;
- account numbers;
- background information;
- contract information;

- credit information;
- market intelligence information; and
- debt and debtor information.

10.4. Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our clients and member agencies:

- contractors, vendors, or suppliers;
- agents, distributors, or other resellers;
- operators, other responsible parties, or co-responsible parties; and
- third-party vendors (such as software developers) to help us maintain our services.

10.5. Security

We secure our data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

11. Other prescribed information

The Minister of Justice and Constitutional Development has not made any regulations prescribing any other information that needs to appear in this manual.

12. Availability of this Manual

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website at: <https://ajsglobal.com/index.html>

13. Updates to this Manual

This manual will be updated whenever we make material changes to the current information.