

QROOPLE (PTY) LTD WEBSITE: PRIVACY POLICY

This privacy policy sets out how Qroople (Pty) Ltd uses information that you provide when you use the Website and sets out the rights and obligations that both you and Qroople (Pty) Ltd have in relation to your personal information.

By using this Website and by sponsoring, posting or downloading a Qroople on the Website, you accept and agree to the collection, use and disclosure of your personal information in accordance with the terms of this Privacy Policy.

1 INFORMATION WE COLLECT

- 1.1 Qroople (Pty) Ltd receives various types of information from Users who access our Website, including:
 - 1.1.1 name or company, email address, phone number, city or town;
 - 1.1.2 unique identifiers;
 - 1.1.3 the information that Qroople (Pty) Ltd gathers about Users as a result of use of this Website, including without limitation details relating to location, preferences, behaviours and attitudes;
 - 1.1.4 information defined as "personal information" in section 1 of the Protection of Personal Information Act, No. 4 of 2013 and/or the General Data Protection Regulation ("GDPR") 679/2016, insofar as same may be applicable.
- 1.2 Qroople (Pty) Ltd's servers automatically record information sent by Users' browsers when Users use our Website, including internet protocol ("IP"), address, browser type, language and date and time of visit. Qroople (Pty) Ltd may also collect information using cookies or similar technologies.
- 1.3 Qroople (Pty) Ltd does not request or collect credit card details or bank account numbers.
- 1.4 Should your personal information change, please inform us and provide us with updates as soon as reasonably possible to enable us to update and keep accurate your personal information.

2 HOW QROOPLE (PTY) LTD USES AND PROCESSES THE INFORMATION THAT YOU PROVIDE OR MAKE AVAILABLE

- 2.1 Qroople (Pty) Ltd requires certain personal information to process transactions if the User sponsors or downloads a Qroople on our Website. Qroople (Pty) Ltd receives and stores all information, including personal information, which the User enters on our Website or gives to us in any other way. The User may choose not to provide certain personal information, but that may limit the service experience that the User wishes to obtain from Qroople (Pty) Ltd.
- 2.2 We use, store and process information about you for the following general purposes:
 - 2.2.1 to enable you to use the Website;
 - 2.2.2 to enable Qroople Sponsors to post a Qroople and enable Buyers to "Find a Qroople" and for the parties to contact each other;
 - 2.2.3 to operate, protect, improve and optimize the Website, our business and our Users' experience and to provide customer service;

- 2.2.4 to send you information requested by you;
- 2.2.5 to enable the updating of service standards;
- 2.2.6 to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
- 2.2.7 to help create and maintain a trusted and safer environment on the Website, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, enforcing our Terms and Conditions, verifying any identifications provided by you, and conducting checks against databases and information sources (such as but not limited to public government databases) for fraud detection and prevention, risk assessment and harm prevention purposes. In this regard, we may do any or all of the foregoing with or without further notifying you.

2.3 Your Personal Information may be transferred, used, and disclosed as follows:

- 2.3.1 the Website allows sponsored Qrooples to be included in search engines and may be published as search results, which results will include the city or town of the property in respect of which a Qroople is posted;
- 2.3.2 when you sponsor a Qroople the contact details referred to in clause 1.1 above will become visible online on the internet and to a Buyer in a printed Qroople and Qroople Sponsors agree that they may be contacted directly by Buyers in respect of sponsored Qrooples;
- 2.3.3 you acknowledge, consent and agree that Qroople (Pty) Ltd may access, preserve and disclose your information if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary (a) to respond to claims asserted against Qroople (Pty) Ltd; (b) to comply with legal process (for example, subpoenas and warrants), including legal process associated with national security and law enforcement; (c) to enforce and administer our agreements with users, such as the Terms and Conditions, this Privacy Policy; (d) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; or (e) to protect the rights, property or personal safety of Qroople (Pty) Ltd, its Users or members of the public.

2.4 Users may visit our Website without providing any personal information. The User accordingly grants his/her express written permission for our Website servers in such instances to collect the IP address of the User's computer, but not the email address or any other distinguishing information. This information is aggregated (added up) to measure the number of visits, average time spent on our Website, pages viewed, etc. Qroople (Pty) Ltd uses this information to determine use of our Website and to improve content. Qroople (Pty) Ltd assumes no obligation to protect this information and may copy, distribute or otherwise use the information.

3 STORAGE

Personal Information will be stored for as long as it is used together with a record of the personal information and the specific purposes it was collected for. Personal Information will be destroyed once it has become obsolete (out of date or unusable).

4 WHO MAY RECEIVE YOUR INFORMATION

- 4.1 When you use the Website to sponsor a Qroople your information will be made available online on the internet and to other Users.
- 4.2 We strongly encourage you to use caution when submitting information on the Website. Qroople (Pty) Ltd does not control and does not accept responsibility/liability for the

disclosure or use of personal information which is voluntarily posted by you on any publicly accessible area of the Website.

- 4.3 Your information will not be sold or made known to any third party except insofar as is provided above and or is required to sponsor/"find" a Qroople or otherwise as required/permitted by law.
- 4.4 Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.
- 4.5 If you disclose your personal information to a third party, such as an entity which operates a website linked to our Website or anyone other than Qroople (Pty) Ltd, Qroople (Pty) Ltd shall not be liable for any loss or damage, howsoever arising, suffered by you as a result of the disclosure of such information to the third party.

5 SECURITY

- 5.1 We will:
 - 5.1.1 treat your personal information as strictly confidential, save where we are entitled to share it as set out in this policy;
 - 5.1.2 take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
 - 5.1.3 provide you with access to your personal information to view and/or update personal details;
 - 5.1.4 promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
 - 5.1.5 provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable notice and request; and
 - 5.1.6 upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged to retain.
- 5.2 We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.
- 5.3 Our personnel will not process information without authorisation. Personnel are obliged to maintain the confidentiality of any information and this obligation continues even after they have stopped working with us.

6 CONTROLLING YOUR PERSONAL INFORMATION/PRIVACY CHOICES

- 6.1 You may choose to restrict the collection or use of your personal information by emailing us at privacy@qroople.com, should you:
 - 6.1.1 have previously agreed to us using your personal information and you wish to change your mind;
 - 6.1.2 require details and/or copies of personal information which we hold about you;

6.1.3 believe that any personal information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

7 COOKIES AND ANONYMOUS IDENTIFIERS

7.1 If you have used the Website then your computer or device may store an identifying cookie or anonymous identifier, which can save you time and each time you revisit the site, by accessing your information when you sign in to the Website.

7.2 We may use cookies and anonymous identifiers for a number of purposes including to access your information when you sign in, keep track of your preferences, direct specific content to you, report on our user base, and to improve our Website. We may also use cookies or anonymous identifiers when you interact with our affiliate service providers if applicable.

7.3 You hereby agree that if you change the settings on your internet browser to block or restrict cookies, including cookies associated with our Website, or to indicate when a cookie is being set by Qroople (Pty) Ltd, our Website may not work as intended. You should remember that, whilst you may still be able to use the Website if your cookies are disabled, it may not function properly on your device and you may not be able to take advantage of certain features on the Website.

8 LINKS TO OTHER WEBSITES

8.1 Our Website may contain links to other websites of interest. However, once you have used these links to leave our Website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and consider the privacy statement applicable to the website in question.

8.2 Some of the content, advertising, and functionality on our Website may be provided by third parties that are not affiliated with us. Such third parties include:

8.2.1 advertising providers which help us provide advertisements that are tailored to Users' interests and understand how Users respond to those advertisements;

8.2.2 audience-measurement companies, which help us measure the overall usage of our Website and compare that usage to other online services; and

8.2.3 social networking services (like Facebook, Twitter, LinkedIn, Instagram) that enable you to register and log into certain of our services and to share things you find on our Website with your social network.

8.3 These third parties may collect or receive information about your use of our Website, including through the use of cookies, web beacons and other technologies, and this information may be collected over time and combined with information collected on different websites and online services. It's important to remember that we don't control the privacy practices of these (or any other) third-party services. So, we encourage you to read the privacy policies of these services before connecting to them.

9 GDPR

9.1 For all Users whose personal information is subject to the GDPR, Qroople (Pty) Ltd progressively ensures that its processing of personal information complies with the requisite provisions.

9.2 Under GDPR, persons in the EU have the following rights:

9.2.1 the right to be informed: you are entitled to know how we use your personal information;

- 9.2.2 the right of access and correction: you have the right to know that your data is being processed and to have access to that data. If the information being processed is inaccurate or incomplete, you have the right to have that information corrected or deleted;
 - 9.2.3 the right to erasure: you have the right to have your information erased in certain circumstances;
 - 9.2.4 the right to opt out: if we process your personal information based on consent, you have the right to withdraw that consent at any time;
 - 9.2.5 the right to lodge a complaint with a supervisory authority; and
 - 9.2.6 the right to data portability.
- 9.3 For the purposes of GDPR, we have appointed a Data Protection Officer to oversee our data protection program who can be contacted by sending an email to privacy@groople.com.

10 AVAILABLE CHANNELS REGARDING COLLECTION, USE AND DISTRIBUTION OF INFORMATION (OPT OUT POLICY)

If you have any questions regarding this Privacy Policy or about our Website information collection practices, please contact us at privacy@groople.com.

11 AMENDMENTS

- 11.1 We may update this privacy policy from time to time. Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you in the appropriate manner.
- 11.2 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to privacy@groople.com.