

Transaction Capital Risk Services Website Privacy Policy (“TCRS Privacy Policy”)

Transaction Capital Risk Services (“TCRS”), as well as its associated businesses and brands, care about your privacy and is firmly committed to the security and protection of personal information of our Users and their contacts. This Policy describes how Transaction Capital Risk Services will collect, use, share and process personal information. Capitalised terms not defined in this Privacy Policy are defined in the TCRS Terms of Service.

By accepting the TCRS Privacy Policy and/or using the Services You consent to the collection, use, sharing and processing of personal information as described herein. If You provide us with personal information about someone else, You confirm that they are aware that You have provided their information and that they consent to our use of their information according to our Privacy Policy. You may opt-out at any time to prevent further use of the information shared via the Services.

Provide, Improve and Personalise our Services

TCRS may use the personal information collected to provide, maintain, improve, analyze and personalise the Services to its Users, partners and third party providers. More specifically, TCRS may use such information to:

- display information based on connections a User may have in common, directly or indirectly, with other Users via a “social graph” algorithm;
- send in application push notifications and reminders and deliver messages via the Services, in which case Your messages will be kept for a limited period of time in order to deliver the messages but TCRS will not, unless specifically stated, monitor the content of Your messages;
- enable You to use and share Your information in connection with Your registration, login or other use of third party services e.g. payment service providers, online services, social networking sites and other third party API’s; and
- otherwise improve our Services, business and operations.

Statistical Data from the Services

We use aggregated or anonymized personal information for statistical and analytical purposes. We may come to share such data with third parties. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

Personalise our Advertising and Communications

We may use any of the information collected, as set out above, to provide You with location and interest based advertising, marketing messaging, information and Services. We may also use the collected information to measure the performance of our advertising and marketing Services. We may contact You for verification purposes or with information pertaining to the Services or special offers, e.g. newsletter e-mails, SMS and similar notifications about TCRS and our business partners’ products and services. We also use the collected information to respond to you when you contact us.

Compliance with Laws and Prevention of Fraudulent or Illegal Activities

We may use the collected information to comply with applicable laws and to enforce our agreements and protect and defend the rights or safety of TCRS, its Users or any other person and verify provided User profile information with third party providers and ensure technical service functionality and data accuracy, perform trouble-shooting and prevent or detect fraud, security breaches or illegal activities.

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

In addition to the sharing and disclosure of personal information that is included as part of the functionality of the Services as described above, TCRS may disclose personal information if we believe such action is necessary to:

- comply with the law, or legal process served on us;
- protect and defend our rights and the enforcement of our agreements; or
- protect the security and safety of Users or members of the public or other aspects of public importance, provided, of course, that such disclosure is lawful.

TCRS will transfer information to trusted vendors, service providers, and other partners who support our business and Services, such as providing technical infrastructure services, bug testing, analyzing how our Services are used, measuring the effectiveness of ads and Services and facilitating payments as well as potential partners who may wish to work with us to provide other services. TCRS will always require these third parties to take appropriate organisational and technical measures to protect personal information and to observe applicable legislation. TCRS may also share personal information with third party advertisers, agencies and networks. Such third parties may use this

information for analytical and marketing purposes e.g. to provide measurement services and targeted ads and for improvement of products and services. The information may be collected by such third parties by use of cookies, or similar technologies, and You can learn more about the use of cookies in our Cookie Policy.

TCRS may disclose and transfer Your Information to our associated or affiliated organisations or related entities and to any third party who acquires, our business, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets.

TCRS will not retain your personal information for longer than is necessary to achieve the purpose for which we collected it, unless there is lawful basis or legal requirement for us to retain your personal information for a longer period.

OPT-OUT OF AD TARGETING

You can limit or opt-out of the collection and use of Your information for ad targeting by third parties via Your device settings.

INFORMATION SECURITY AND TRANSFER OF PERSONAL INFORMATION TO OTHER COUNTRIES

In order to provide the Services, TCRS will transfer, process and store personal information in a number of countries, including but not limited to South Africa, and may also use cloud based services for this purpose. TCRS may also subcontract storage or processing of Your information to third parties located in countries other than Your home country. Information collected within one country may, for example, be transferred to and processed in another country, which may not provide the same level of protection for personal data as the country in which it was collected. You acknowledge and agree that TCRS may transfer Your personal information as described above for purposes consistent with this Privacy Policy. We take all reasonable precautions to protect personal information from misuse, loss and unauthorized access. TCRS has implemented physical, electronic, and procedural safeguards in order to protect the information, including that the information will be stored on secured servers and protected by secured networks to which access is limited to a few authorized employees and personnel. However, no method of transmission over the Internet or method of electronic storage is 100% secure.

ACCESSING AND UPDATING PERSONAL INFORMATION

TCRS may on its own initiative, or at Your request, replenish, rectify or erase any incomplete, inaccurate or outdated personal information retained by TCRS in connection with the operation of the Services. When required by applicable law, You have the right to know what personal information is stored about You and to have any such information corrected or deleted on Your request. See contact details below.

MINORS

Services are not intended for or designed to attract anyone under the relevant age of consent to enter into binding legal contracts under the laws of their respective jurisdictions. TCRS does not intentionally or knowingly collect personal information through the Services from anyone under that age. We encourage parents and guardians to be involved in the online activities of their children to ensure that no personal information is collected from a child without their consent.

CHANGES TO THIS PRIVACY POLICY

TCRS may at any time with or without a separate notice change this Privacy Policy, and You are encouraged to review this Policy from time to time. In case of substantial changes, TCRS will notify the Users by push notice or via notice in the Services. Your continued use of the Services after a notice of changes has been communicated to You or published on our Services shall constitute consent to the changed policy.

USE OF IP ADDRESSES

We also collect information that does not identify you personally through our Internet log files, which record data such as IP addresses, browser types and other anonymous statistical data. This information may be used to analyse trends and to gather general demographic information. We do not link this information to personally identifiable information.

CONTACT INFORMATION

If You have any additional questions about TCRS's Privacy Policy or want to make a request regarding certain personal information, You are encouraged to contact TCRS via our contact page on any of our websites.

COOKIES

This section of the policy is designed to help you understand more about how and when we use cookies on our applications, sites, services and tools and the choices you have. This cookie policy applies to any TCRS product or service that links to this policy or incorporates it by reference.

We use cookies, web beacons, flash cookies, HTML 5 cookies, pixel tags and other web application software methods (collectively "cookies") that are essentially small data files to store information in your web browser or on your mobile phone, tablet, computer, or other devices (collectively "devices") that allow us to store and receive certain pieces of information whenever you use or interact with our applications, services, sites and tools.

We use the following types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions.
- First-party cookies are set by Transaction Capital
- Third-party cookies are set by a third party, i.e. an authorized service provider of Transaction Capital

Transaction Capital use of Cookies

As we update and improve our Services the specific cookies we use may change from time to time, but they will generally fall into one of the below categories:

Categories of Use	Description
Authentication	If you're signed in to TCRS, cookies help us show you the right information and personalize your experience
Security	We use cookies to enable and support our security features such as identifying irregular site behaviour, prevent fraudulent activity and improve security and violations of our Terms of Service.
Preferences, features and services	These cookies can tell us which language you prefer and what your communications preferences are and store such preferences and other information. They can also help you fill out forms on the TCRS service more easily.
Advertising	We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.
Performance, Analytics and Research	Cookies help us learn how well our site, services and tools perform in different locations. We also use cookies to understand, improve, and research products, features, and services, including when you access Transaction Capital from other websites, applications, or devices such as your work computer or your mobile device.

Third party use of Cookies

TCRS may work with third-party companies, commonly known as service providers, who are authorized to place third-party cookies for storing information on our sites or in our Services, applications, and tools with our permission. These service providers help us deliver our own content and advertising, and compile anonymous site metrics and analytics and to provide you with a better, faster, and safer experience.

We may also use third parties, such as advertising networks and exchanges, to allow us to serve you advertisements. These third-party ad networks and exchange providers may use third-party cookies to collect information. They may also collect your device identifier, IP address, or identifier for advertising. The information that these third parties collect may be used to assist us in providing you with more relevant advertising that we serve on our sites or elsewhere on the web. Third-party cookies are covered by the third parties' privacy policy. These service providers are subject to confidentiality agreements with us and other legal restrictions on their use or collection of any personal information. Third-party cookies are covered by the third parties' privacy policy.

Your cookie options

Most browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may limit your user experience as it may stop you from saving customized settings like login information and other personalized preferences. Please note that opting out will not remove advertising from the pages you visit; it will mean that the ads you see may not be matched to your interests. In addition most browsers also provide functionality that lets you review and erase cookies, including TCRS cookies. Please note that some TCRS functionality may stop working properly without cookies.

Cookies we use

Below is a full list of the cookies we use together with a description of what they are used for. If the Cookie is a third party cookie, please check out the service provider's website for more information

Cookie	Cookie Name	Type	Description	Read More
Cloudflare	__cfduid	Cookie	This cookie is used by Cloudflare to protect our website	https://support.cloudflare.com/hc/enus/articles/200170156-understanding-the-CloudflareCookies
Google Analytics	__ga __gat_gtag_* __gid	Cookie	Gathers anonymous data for website reporting	https://www.optimizesmart.com/google-analytics-cookies-ultimate-guide/
ar	__hjid __hjid*	Cookie	Gathers anonymous website usage data so we can provide you a better experience	https://help.hotjar.com/hc/enus/articles/115011639927-What-is-the-Hotjar-TrackingCode

Your Google Activity and Tracking

Should you wish to clear your Google Activity and tracking, you can go to <https://myactivity.google.com>