
	<b>PRIVACY POLICY</b>			
	<b>Doc. No.</b>	PRO-QA-023	<b>Ver. No.</b>	

**Purpose:**

ProFloat (PTY) Ltd ("we", "us", "our") is committed to protecting your privacy and ensuring you have a positive experience with our services. This Privacy Policy how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

ProFloat (and including this website, www.profloat.com) is committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This policy affects all employees, including board members, investors, contractors, volunteers, service providers and clients who may have access to confidential information.

**Introduction:**

ProFloat to carry out its aims and objectives, does, and will, on an on-going basis receive, provide and process Personal Information.

In terms of a law known as the Protection of Personal Information Act, 4 of 2013 (POPIA) everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one’s Personal Information.

To give effect to this right, ProFloat is under a duty to provide any person whose Personal Information is processed by it with a number of details pertaining to the use of and subsequent processing of the Data Subject’s Personal Information, before such Personal Information may be used or processed by ProFloat.

**Information We Collect:**



We may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Policy.

**Personal Information:** When you interact with us, we may collect personal information such as your identity information, title, race, gender, marital status, legal status, name, contact details, address, email address, payment information as well as copies of your identity documents, photographs, qualifications, registration numbers and qualifications. This may differ on the basis of service that you receive.

**Contact Information:** which includes your billing addresses, delivery addresses, e-mail addresses and telephone numbers, as well as company secretarial information that has been disclosed in relation to you;

**Usage Data:** We may also collect non-personal information about your interaction with our website and services, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website;

**Financial Information,** which includes bank account and payment card details, insurance information, financial statements, VAT registration numbers, regulatory filings, fund information and investor statements;

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**Marketing and Communications Information**, which includes your preferences in respect of receiving marketing information from us and our third parties, and your communication preferences.

**How We Use Your Information:**



**We use the information we collect for the following purposes:**

- Provide services or products you request (e.g. send you by email or other electronic means or other products or services in which you express an interest);
- To conduct credit reference checks and assessments;
- Inform you of changes made to our Website;
- Develop a more direct relationship with you for the purposes described in this section;
- Understand general customer trends and patterns so we can develop and support existing and ongoing marketing strategies for our products and services;
- For security, administrative and legal purposes.
- To process payments and fulfil orders.
- To comply with legal obligations.

**Sharing Your Information:**

We may share your information in the following circumstances:

- We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission or in the manner as set out in this Privacy Policy.  
ProFloat may share your Personal Information under the following circumstances:
- with other entities within ProFloat(including those based overseas) that have agreed to be bound by this Privacy Policy. To the extent legally permissible and in accordance with the conditions of this Privacy Policy, we may share your Personal Data with any successor entity.
- with our agents, advisers, service providers and suppliers that have agreed to be bound by this Privacy Policy or similar terms, which offer the same level as protection as this Privacy Policy;
- with our employees, suppliers, service providers and agents to the extent that they require such Personal Information in the provision of services for or to us, which include hosting, development and administration, technical support and other support services relating to the Website or the operation of the ProFloat business. We will authorise any Personal Information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;
- to enable us to enforce or apply any other contract between you and us;
- to protect our rights, property or safety or that of our customers, employees, contractors, suppliers, service providers, agents, brokers and any other third party;
- to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents, brokers or any other third party;
- with entities that are based overseas (“Overseas Recipients”). ProFloat cannot guarantee that any such Overseas Recipients will comply fully with the ProFloat's privacy principles in relation to your Personal Data. Notwithstanding the a foregoing, ProFloat undertakes to take all reasonable steps to ensure that any such

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Overseas Recipients are bound by terms and conditions substantially similar to those contained in this Privacy Policy. By continuing to use the Website, you acknowledge and consent in respect of the aforementioned transfer of your Personal Data to any such Overseas Recipients on these terms as permitted by the ProFloat privacy principles and agree not to hold ProFloat liable in this regard.

- with governmental agencies, exchanges and other regulatory or self-regulatory bodies, if required to do so by law or there is a reasonable belief that such is necessary for:
  - compliance with the law or with any legal process;
  - the protection and defence of the rights, property or safety of ProFloat, or our customers, employees, contractors, suppliers, service providers, agents, brokers or any third party;
  - the detection, prevention and management of actual or alleged fraud, security breaches, technical issues, or the abuse, misuse or unauthorised use of the Website and contraventions of this Privacy Policy;
  - the protection of the rights, property or safety of members of the public (if you provide false or deceptive information or misrepresent yourself, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

### Security of Your Information

We implement appropriate technical and organizational measures to protect your information from unauthorized access, use, alteration, or destruction.

- We take reasonable technical and organisational measures to secure the integrity of retained information and protect it from misuse, loss, alteration and destruction through the use of accepted technological standards that prevent unauthorised access to or disclosure of your Personal Information.
- We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.
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### Retention of Information:



We may retain and Process some or all of your Personal Information if and for as long as:

- we are required or permitted by law or a contract with you to do so;
- it is for lawful purposes that are related to our performance of our functions and activities;
- we reasonably require it for evidentiary purposes; or you agree to us retaining it for a specified further period.

### Your Choices and Rights

You have the right to:

- Request access to your Personal Information, thereby enabling you to receive a copy of the Personal Information retained about you.
- Object to the processing of your information.

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- Request the correction of your Personal Information, in order to ensure that any incomplete or inaccurate Personal Information is corrected.
- Request the deletion of your information, subject to legal requirements.
- Withdraw consent previously given in respect of the processing of your Personal Information at any time which withdrawal of consent will not affect the lawfulness of any processing carried out prior to your notice of withdrawal.

**Children's Privacy**

Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from children without parental consent.

**Changes to This Privacy Policy**

We may update this Privacy Policy periodically to reflect changes in our practices or legal requirements. We will notify you of any material changes by posting the updated policy on our website.

**Contact Us**

If you have any questions about this Policy or our data practices, please contact us at:

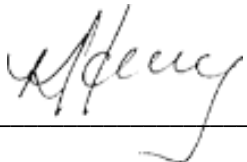
**Pro Float (Pty) Ltd**

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[www.profloat.com](http://www.profloat.com)

Signed: 

**Approval:** Keane Harvey

**Date:** 1 July 2024

**Capacity:** Managing Director