POPIA & PRIVACY POLICY

Compiled in conjunction with the Protection of Personal Information Act, 2013 (POPIA) came into effect and governs the processing of personal information by public and private bodies across the board.

1. CUSTOMER PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

By providing your personal information, you agree that:

1. Commerce Edge South Africa may collect, process, and store your details to assist with course enquiries and related educational services.

2. If we cannot assist you directly, your information may be securely shared with trusted partner institutions within the UXi Group for the sole purpose of helping you enrol in a suitable course.

3. Your personal information will only be used in accordance with applicable data protection laws (e.g., POPIA) and will not be shared for unrelated marketing or other purposes without your explicit consent.

4. You have the right to withdraw your consent or request access to your information at any time by contacting our Information Officer at: informationofficer@ce-learn.com

At Commerce Edge South Africa (Pty) Ltd (and including our websites: www.commerce-edge.com; https:/ /connect.brains-on.corn; https://spwonline.co.za; https://mycareer.commerce-edge.com; https://cips.commmerce-edge.com; https://executive.commerce-edge.com; https://tcohero.com; and https://smartprocurementworld.com; www.smartprocurement.co.za) we are committed to

protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

2. ABOUT THE COMPANY

Commerce Edge South Africa (Pty) Ltd is an organisation that complies with the laws of South Africa and recognises that a person's constitutional right to privacy is of the upmost importance, therefore the protection of personal information is vital for sustainability and growth of our business.

Commerce Edge South Africa (Pty) Ltd comprises the following businesses or business units which all subscribe and are subject to this Privacy Policy:

- Smart Procurement
- Commerce Edge Academy
- Commerce Edge Training
- Commerce Edge Learning Innovation

Smart Procurement provides world class procurement and supply chain trends, and solutions, events and initiatives focusing on continued professional development of individuals.

Commerce Edge Academy is a registered international study centre for the Chartered Institute of Procurement and Supply (CIPS), an associate of the Da Vinci Institute offering the Supply Chain component of the Da Vinci Institute's Bachelor of Commerce in Business Management with electives in Integrated Supply Chain Management qualification, an Authorised Education Provider for the Chartered Institute of Logistics and Transport (CILT) in South Africa and an accredited training provider for QCTO Supply Chain qualifications.

The Academy supports students on qualification programmes on an international basis and provides blended-learning tuition at all levels.

Commerce Edge Training offers a range of short courses to enhance skills and increase supply chain and procurement competence in the workplace. These courses are regularly presented to the public and can also be tailored for companies as in-house options.

Commerce Edge Learning Innovation is a learning technology and strategy provider and enabler that focuses on the optimisation of learning retention to ultimately deliver competence.

3. SCOPE AND PURPOSE

The POPI Act stipulates 8 conditions for the lawful processing of data. These include:

1. Accountability
2. Processing limitation
3. Purpose specification
4. Further processing limitation

5. Information quality
6. Openness
7. Security safeguards
8. Data subject participation

This document outlines the process followed on Commerce Edge (Connect) to ensure compliance with the POPI Act.

4. TRAINING AND NON-DISCLOSURE

All employees of Commerce Edge has been trained on POPI Act Awareness during July 2021. All employees and contractors of Commerce Edge South Africa (Pty) Ltd has signed a Non-Disclosure Agreement as part of their employment contracts which stipulates that they may not share any personal information of any of our clients, students and system users with any third parties without the express written permission of the data subject (you).

5. CONDITION 1: ACCOUNTABILITY

Commerce Edge South Africa (Pty) Ltd will ensure conditions for lawful processing of Personal Information - especially when it comes to the electronic processing of such information on Commerce Edge Connect.

6. CONDITION 2: PROCESSING LIMITATION

The second condition handles the processing of data on the system. This include processing data in such a way that it doesn't risk the subject's privacy, that only relevant data is processed, that the subject gives consent for this data to be used. Proof of this consent must be kept on the system and the subject should be able to withdraw this consent at any given time.

The following data is processed on the system:

6.1. Personal Information

Enquiry Forms

- Name
- Surname
- Email address
- Contact Number

Purpose of this information is to be able to contact you regarding your enquiry.

Sign up to our Events and Learning Management systems:

Only relevant personal information, which is required for identification purposes, is asked from the user upon signing up to any of our mailing lists as well as Connect and Events (SPW Online):

- Name

Surname
Email address
Organisation
Contact Number

From browser

Automatic Internet usage information is logged on the system, such as Internet Protocol address (IP address), browsing habits, click patterns, cookie preferences, 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).

Cookies

Small text files called 'cookies' are put on the user's device when they visit the site. These files do contain a personal identifier allowing Commerce Edge Connect to associate personal data with a certain device. These files ensure the tailoring of the website's functionality to the user's personal preferences, e.g. allowing quick access links to most recently used areas of the site.

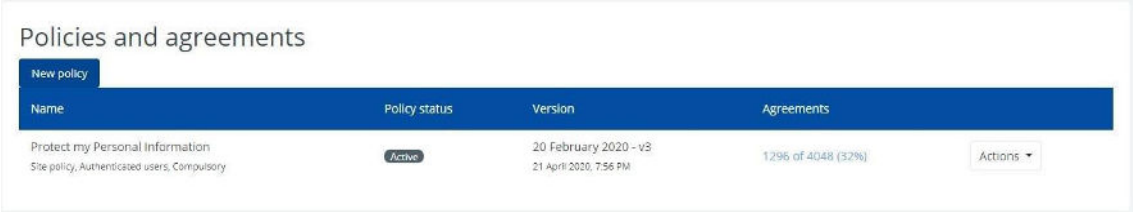
7. PRIVACY POLICY AGREEMENT

7.1. Enquiry Forms

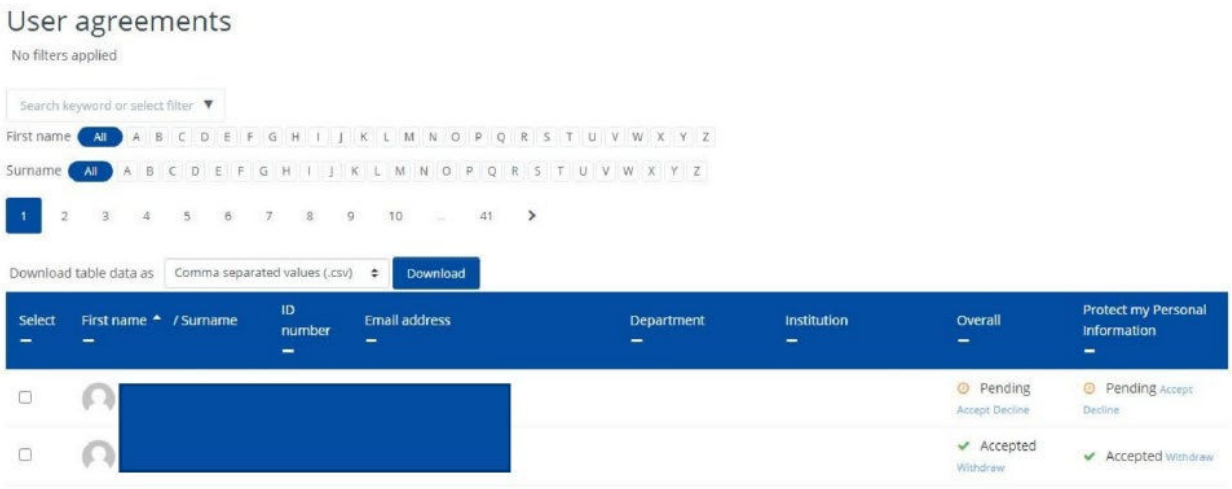
There is an opt-in option provided on all enquiry forms as well as a link to our Privacy Policy. This serves as your agreement that we may process your personal information.

7.2. Events and Learning Management systems

All users must accept a privacy policy when logging in the first time and thereby giving consent for personal data to be processed and used to complete services rendered by Commerce Edge.



A copy of the user agreements (proof of acceptance of policy) is kept on the system.



The user can withdraw this consent at any time. See following example:



8. CONDITION 3: PURPOSE SPECIFICATION

Condition 3 details the reasons for collecting data and specifies that this data should only be kept on the system(s) or websites for as long as necessary to process what the users do on systems.

There are two aspects around this. The first one is that the learner/delegate should be identified, and that proof of this identity could be required to be uploaded to the system.

SPW Online is an online events system, whereby users on the system completes various eventrelated activites and records of these activities are linked to the users.

Commerce Edge Connect is an online learning system, whereby users on the system completes learning activities and records of these activities are linked to the users. The law requires that this information is kept for 5 years.

8.1. Third party data processing

Certain information is required by governing bodies, e.g. the Quality Council for Trades and Occupations (QCTO), various SETAs, CIPS and CILT. By rule of law, we trust that these organisations will abide by the POPI Act, and therefore cannot take any responsibility or liability for these bodies' processing policies.

The Company Website may offer links to third-party websites, including payment gateways for credit card payment. You should be aware that operators of linked websites may also collect your personal information (including information generated using cookies) when you visit their websites. If you

follow a link to any of these websites, it is important to note that these websites have their own terms of use and privacy policies and that the Company does not accept any responsibility or liability for them.

The Company is not responsible for any representations, information, warranties, or content on any website of any third-party. The Company does not exercise control over third-parties' privacy policies. The Company is not responsible for how such parties collect, use, or disclose your information. It is important for you to familiarize yourself with their privacy policies before providing them with your personal information

The Company may use Google Analytics or other similar analytical tools to obtain information collected to display, optimise, and personalise advertisements and customer experience on our Website(s) to determine which advertisements you may find useful, and to personalise your experience on the Website.

Other information may be used for Alumni Communication, Notification of Professional Development Events, Training and Further Education.

9. CONDITION 4: FURTHER PROCESSING LIMITATION

The following measures are put in place to ensure users' privacy:

There are three options available on the Commerce Edge Connect and SPW Online systems when it comes to users' information:

- Not visible
- Visible to user
- Visible to everyone

All data fields are set to "Visible to user", so that only the user and the Systems Administrator can access their own personal data. Relevant information may be sent to our CRM and be viewed by our Customer Service Agent to support our learners in their studies.



Email display default is set to hidden:



10. CONDITION 5: INFORMATION QUALITY

When a user signs up with the Academy and Training Business Unit for an Accredited Programme, proof of ID is required for registration with the relevant Academic Body or Authority. Therefore, along

with personal information entered on the system, a verified proof of ID should also be uploaded to the system (Only for learners studying towards an Accredited Programme. ID Documents are not required for non-accredited short courses). The user receives a username and password, which is used to log in to Commerce Edge Connect.

Commerce Edge will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary

- In taking the steps referred to above, Commerce Edge must have regard to the purpose for which personal information is collected or further processed

Commerce Edge Connect provides all users with the ability to update and ensure correctness of their own personal information through the "Update my profile" functionality.

11. CONDITION 6: OPENNESS

Commerce Edge South Africa will take reasonably practicable steps to ensure that learners and delegates (All users) are made aware of:

- the information being collected and if not directly from the data subject, the source from which it is collected
- the name and address of Commerce Edge South Africa
  the purpose for which the information is being collected (Available in Annexure A)
- whether or not supply of this information by the data subject is voluntary or mandatory
- the consequences of failure to provide such information
- any particular law which authorizes or requires the collection of the information
- the intention of Commerce Edge South Africa to transfer the information to a third country or international organization and the level of protection provided to this information by that country or organization
- any further information necessary to enable processing in respect of the learner to be reasonable, taking into account the specific circumstances in which the information is to be (or not to be). For example:
- recipient or category of recipients of the information
- nature or category of the information
- existence of the right of access to and right to rectify the personal information collected
- the existence of the right to object to the processing of the information
- the right to lodge a complaint to the Information Regulator

12. CONDITION 7: SECURITY SAFEGUARDS

Commerce Edge Connect and SPW Online work with system roles and capability security. Thus, only individuals who should have the capability to view certain information, has that capability.

Commerce Edge South Africa subscribes to industry standards for information technology security as per the POPI Act.

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security
- Computer and network security
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information
- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigating and reacting to security incidents

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

13. CONDITION 8: DATA SUBJECT PARTICIPATION

Commerce Edge Connect provides all users with the ability to update and ensure correctness of their own personal information through the "Update my profile" functionality. Users can at any time access their profiles to view the information that we keep on them.

14. DATA REQUESTS

If you want to update your information, find out what information we keep on you, or have your personal information deleted from any of our systems, please send an email to informationofficer@ce-learn.com.

You have the right to complain to the Information Regulator, whose contact details are:

Woodmead North Office Park
54 Maxwell Drive
Woodmead
Johannesburg
2191

P.O Box 31533 Braamfontein

Johannesburg

2017

POPIA Complaints e-mail: **POPIAComplaints@inforegulator.org.za**

PAIA Complaints e-mail: **PAIAComplaints@inforegulator.org.za**

General enquiries e-mail: **enquiries@inforegulator.org.za**

15. CHANGES TO THIS POLICY

We reserve the right, in our sole and absolute discretion, to update, modify or amend (including without limitation, by the addition of new terms and conditions) this policy from time to time with or without notice or justification. You therefore agree to review the policy whenever you visit the website for any such change. Save as expressly provided to the contrary in this policy, the amended version of the policy shall supersede and replace all previous versions thereof.