



Privacy Policy

You may be required to submit personal information while using the vt.smartonlinetrader.com website ("Website"), browse or uses any of our landing pages, or services, or want to connect with us.

This Privacy Policy describes the Company's policies and procedures on the collection, use, disclosure, and safekeeping of your personal information. This Policy complies with the Protection of Personal Information Act (POPIA) and with the General Data Protection Regulation (GDPR) to the extent that the GDPR applies.

Personal Data (as defined in Article 4 of the GDPR) means any information that relates to an identified or identifiable natural person (data subject) An identifiable natural person can be directly- or indirectly identified.

Personal Information will have the same meaning as defined in Section 1 of POPIA. In this Policy, when referring to Personal Information reference thereof will include Personal Data.

The Company also referred to as "we", "our" and "us" means Diversit-e Smart Trade College (Pty) Ltd, registration number 2016/305525/07, address Cambridge Park, Block 8, Mezzanine, 5 Bauhinia Street, Highveld Techno Park, Centurion, South-Africa, 0169. Reseller Agents, appointed by the Company, also comply with the terms of this Policy.

We take all reasonable and necessary steps to ensure your personal information is protected.

By communicating electronically with us, accessing your Smart Online Trader Learning Management System (SOT LMS), and browsing through any of our other websites or landing pages you acknowledge that you have read this Privacy Policy and consent to the processing of your personal information as provided for in this policy ("Policy")

Scope of Policy

The primary object of this policy is to inform you, being the person or organization to whom the personal information relates, as to

- i) Who is responsible for collecting personal information
- ii) Types of data we collect
- iii) How we collect data
- iv) Use and analysis of your data
- v) Third parties with whom we may share your personal information
- vi) Storage and retention of personal information/personal data
- vii) Data security
- viii) Analytics
- ix) Transfer of your data
- x) Unauthorized access to your information
- xi) Links to other websites/landing pages
- xii) Governing law
- xiii) Your rights
- xiv) How to contact us
- xv) Details for the Information Regulator
- xvi) Amendments or changes to this Policy

Who is responsible for the collecting and safekeeping of your personal data

Where we collect, use, and have access to your personal information, the Company will be responsible, in the context of this Policy to protect your personal information safe, as reasonably required and expected.

Types of data we collect

Personally identifiable information that we will use to contact you or to identify you. This identification information may include, but is not limited to:

- Your first and last name
- Your email address
- Contact number
- Identification number
- Billing information (billing address, shipping address, payment information, including credit card details, etc.)
- Login and usage history
- You consent that authorized representatives of ours may access your self-managed trading account history, solely to give after-sales-support coaching.

How we collect data

- Active Information Collection
- Inactive Information Collection
- Tracking Technologies and Cookies

When we collect personal information/personal data from a data subject, we will comply with the notification requirements as set out in Section 18 of POPIA, and to the extent applicable, Articles 13 and 14 of the GDPR.

We will collect and process personal information/personal data in compliance with the conditions as set out in POPIA and the processing principles in the GDPR (as the case may be), to ensure that it protects the data subject's privacy.

Active Information Collection

Active information collection refers to instances where we obtain information from a data subject where they have directly provided us with Information, such as when we receive an inquiry in respect of a specific offering or service, or when a data subject subscribes to receiving marketing material from us. Throughout the use of our Website(s) or pursuant to providing a data subject with the relevant products and/or services, we may request that the data subject provides us with Personal Information and views/ or opinion in the form of a questionnaire, such information is required to assist us to not only improve our products and services to our client but also ensure that our clients continue to experience products and services that are of exceptional value and quality. We may also use personal information to provide data subjects and clients with electronic updates, alerts, and other information regarding our products and services.

Inactive Information Collection or Usage Data

Usage Data

refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit)

Inactive or passive Information collection

refers to instances where we collect Information from data subjects that they have not actively provided as contemplated above. To this end, we may use technologies to passively collect information while data subjects or clients are visiting, accessing, or using our Website or making use of our services or products. These technologies allow us to collect certain kinds of information which can perhaps not be linked to a data subject or client as a person (i.e. non-personally identifiable information), such as their internet domain name, the type of web browser they use, the operating system they use, the date and time of their visit to our Website, the specific pages they may have visited, and the address of the website which they have visited before entering our Website.

Kindly note that we do not link this passively collected non-personally identifiable information with personally identifiable information a data subject or client has actively provided elsewhere on our Website or at any of our physical locations and/or facilities. We reserve the right to share with third parties, including our business partners and advertisers, any anonymous aggregated non-personal information which we may have passively collected via our Website.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to collect information passively or inactively through our Website, namely:

i) Cookies:

Our Website uses cookies, which are small text files that store non-personally identifiable information about a client or data subject, either temporarily in connection with their Internet Protocol (IP) address (known as a temporary or session cookie, and deleted once they close their browser window) or more permanently on the hard drive of their computer (known as a permanent or persistent cookie). We use session cookies so that a data subject or client does not have to fill in the same information from page to page within our Website. If a data subject or client elects not to receive cookies, they may be able to view some, but not all, of the content on our Website.

ii) Web Beacons:

We may include small graphic images called web beacons, also known as “Internet tags” or “clear gifs,” in our web pages and email messages. Web beacons may be invisible to data subjects or clients, but any electronic image inserted into a web page or e-mail can act as a web beacon. We may use web beacons or similar technologies for several purposes, including, without limitation, counting the number of visitors to our Website, monitoring how users navigate the Website, counting how many emails that we sent were opened, or counting how many particular articles or links were viewed.

iii) Embedded Scripts:

An embedded script is programming code that is designed to collect information about your interactions with the relevant Website. It is temporarily downloaded onto the computer of a data subject or client from our web server or a third party we may work with, is active only while a data subject or client is connected to the relevant Website, and is deleted or deactivated thereafter.

iv) Mobile Device Identifiers:

Certain mobile service providers uniquely identify mobile devices and we or our third-party service providers may receive such device information if a data subject or client accesses our Website through mobile devices. Certain features of the relevant Website may require the collection of mobile phone numbers and we may associate that phone number with the mobile device identifiers. Additionally, some mobile phone service providers operate systems that pinpoint the physical location of devices that use their service. Depending on the provider, we and our third-party service providers may receive this information. If we associate any such passively collected information with a data subject or client's Personal Information/Personal Data, we will treat the combined information as Personal Information as contemplated in this Policy.

Use and analysis of your data

All Personal data/information that may be collected from a data subject will only be processed in accordance with this Policy or as specifically disclosed to you and/or brought to your attention at the time you provide the information.

We generally will use your data:

- To perform in terms of an online order, or purchase sale agreement.
- Providing- and maintaining our service, which includes monitoring your usage of our service.
- To contact you via email, telephone calls, SMS, or any other form of electronic communication.
- To inform you of events, coaching sessions, and general information about the SOT LMS and services.
- Address your inquiries.
- Processing payment/s, invoicing, and or billing.
- Screen for potential fraud or risk (in particular, your IP address).
- For record-keeping purposes. Our CRM (Customer Relations Management) System details interactions made with consumers or clients such as notes or recordings of incoming- and outbound calls, email correspondence, letters sent to us, sms notifications, or other records of any contact with us.
- We analyze our clients' browsing and interaction behaviours. This information is used for marketing and advertising campaigns.

A data subject has the right to a copy of his/her personal information/personal data which is held by us.

If you made a purchase, online- or entered into a purchase sale agreement, and or opt-in to receive emails or SMS notifications, you agree to receive email- or SMS communications from us, including but not limited to events, site updates, promotions, newsletters, or general correspondence. Always check your spam or junk mail folders. We are not responsible if you do not receive emails and it is your responsibility to ensure our email addresses are not blocked or in a junk- or spam folder. When you unsubscribe or opt-out from receiving emails, you confirm that you may not receive important information, promotions, or advertising material.

ActiveCampaign is a marketing email service provider that we use to manage and send emails to you.

Their Privacy Policy can be viewed at https://www.activecampaign.com/legal/privacy-policy?_ga=2.268394055.891089512.1658332718-2551186.1657188583

Third parties with whom we might share your personal information

- We will be entitled to lawfully process your Personal Information and to disclose such Personal Information to any employees, contracted third parties, or authorized agents or representatives, as well as trade partners, to facilitate the procurement of products and/or services which you may have requested. We will only disclose personal information/personal data to third-party service providers where necessary to achieve the purpose/s for which the personal information/personal data was originally collected and processed. We will ensure that contractual agreements are entered into with such third-party service providers to ensure that they comply with applicable laws according to the processing of personal information/personal data provided to them by us.
- We will not sell, transfer, share, or otherwise permit access to your Personal Information with any third parties other than as described in this Policy. Please note that we reserve the right to transfer, or otherwise share without restriction aggregated, de-identified, and other non-personally identifiable information as contemplated in this Policy.
- We further reserve the right to use or disclose your Personal Information provided by you through, or using, our Website or the use of our products and/or services as may be required from time to time to respond to your requests, comply with applicable laws, regulations, legal processes, and law enforcement inquiries, as required by litigation, to take precautions against liability, and protect the security and integrity of our Website and the safety of its users.
- We may use third-party services for payment processing (e.g., payment processors).

When you submit an online purchase, we will not store or collect your payment card details. This information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards and requirements to ensure the secure handling of payment information.

When you apply for financing, your information will be shared with the financial institution, who will in terms of their privacy policies make contact directly with you to finalize any finance application.

- Privacy policies of payment processors we use:

Stripe <https://stripe.com/us/privacy>

Netcash https://netcash.co.za/wp-content/uploads/2022/10/netcash_privacy-notice.pdf

Payfast <https://payfast.io/privacy-policy/>

PayPal <https://www.paypal.com/za/webapps/mpp/ua/privacy-full>

- Fraud- and security prevention providers.
- Our developers might need to import personal data.
- Service Providers to monitor and analyze the use of our service, for payment processing, to contact you.
- Service Providers for email- or telephone recording and record management.
- You may give your consent to use your personal information for marketing purposes.
- Billing, collections, or payment-related matters.

Access to Personal Information classified as “Confidential” or “Restricted” shall be limited to authorized persons who in the fulfillment of their obligations require such access.

Storage and retention of personal information/personal data

All Personal Information provided to us electronically will be stored on our secure servers located in South Africa. We also make provision for any hard-copy information to be stored and filed securely.

Your personal information will be stored by us, for our records, unless you ask us to remove/delete this information.

We are ATMOS (an entity that fulfills all regulatory compliance standards by encrypting recordings with a 256-bit AES rotating encryption and storing them on a secure cloud server) compliant, which means that any call made to a data subject, client, or a third party may be retrieved for quality and control purposes.

Data Security

We are committed to implementing leading data security safeguards to protect your personal information from unauthorized access, copying, accidental loss, disclosure, theft, or destruction.

If we have a contract with another organization to provide us with services or a service on our behalf to process your personal information, we will ensure that your information is protected and that they only process your information in the way we have authorized them to. These organizations will not be entitled to use your personal information for their purposes or to make it available to any other third party.

Unfortunately, the transmission of information *via* the internet is not completely secure. Whilst we have taken all appropriate, technical, organizational, and reasonable measures to secure the integrity and confidentiality of the Personal Information in our possession, to guard against the loss of, damage to, or unauthorized destruction of Personal Information and unlawful access to or processing of Personal Information, we do not guarantee that our security system is 100% secure or error-free. Therefore, we do not guarantee the security or accuracy of the information (whether it be Personal Information or not) that we collect from data subjects and process under this Policy.

We however commit to notify any affected data subject and the relevant regulator as soon as reasonably possible should we become aware of any security breach.

You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter, and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information. Social plug-ins and social applications are operated by the social network themselves and are subject to their terms of use and privacy and cookie policies. You should make sure you are familiar with these.

We will never ask for your secure personal or account information by unsolicited means of communication. You are responsible for keeping your personal and account information secure and not sharing it with others. By accepting the terms and conditions to which this policy relates, the data subject agrees to indemnify and hold us harmless for any security breaches which may potentially expose the personal information/personal data in our

possession to unauthorized access or the unlawful processing of such personal information/ personal data by any third party.

Analytics

Third-party service providers may be used to monitor and analyze the use of our services.

Google Analytics, a service offered by Google, tracks, and monitors website traffic and the use of our services. This data is shared with other Google services and may Google use this data to personalize the ads on its advertising network.

You can opt-out by installing the Google Analytics opt-out browser add-on that will prevent Google Analytics from sharing information with Google Analytics about visit activity.

Visit the Google Privacy and Terms page: <https://policies.google.com/privacy>

Transfer of your data

We process your personal information and personal data at our operating offices and in any other places where the parties involved in the processing are located. This means that information may be transferred or maintained on servers or computers outside of your country, province, state, or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction.

Your submission of your information will represent your agreement to such transfer.

We will take all reasonable steps to ensure that your personal information and personal data are not transferred to an organization or country where there is not adequate control to secure- and protect your personal information.

Unauthorized access to your information

Despite the security measures we have in place to protect your personal information (firewalls, password access, and encryption methods) you acknowledge that it may be accessed by an unauthorized third party, e.g., because of illegal activity.

You acknowledge that any transmission of Personal Information will be solely at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorized access to it. We shall not however be held responsible for, and by accepting the terms and conditions to which this Policy relates, you agree to indemnify us and hold us harmless for any security breaches which may potentially expose the Personal Information in our possession to unauthorized access and or the unlawful processing of such Personal Information by any third party.

Links to other websites

On our Website, you may see references or links to websites that are owned and/or managed by third parties which third parties are unrelated to us ("Third Party Websites"), and which Third Party Websites are specifically excluded from this Policy.

These Third-Party Websites have separate and independent terms and conditions and privacy policies applicable to their respective sites, services, and or products. These Third-Party Websites may follow different practices in the processing and security of Personal Information,

and you are strongly advised to read the privacy policy of each Third-Party Website you visit before providing Personal Information.

We shall bear no responsibility or liability for the products offered, services rendered, or content provided through or using any Third Party Websites. We, therefore, make no warranties or representations whatsoever regarding the products offered or services rendered by any third party or the content or activities of any Third-Party Websites which may be accessed or used through or using our Website and/or their associated services.

Governing law

We protect a data subject's constitutional right to privacy and will use and process your personal information or data following the laws of South Africa, and more specifically in terms of the POPIA Act.

Your rights

We are committed to processing Personal information in a manner that is consistent with applicable data protection laws. Below we set out details on how you can exercise your rights. Please note that the same is not intended to be a closed list and that you are advised to consult the relevant legislation or take legal advice in respect of your rights and entitlements under the applicable data protection laws, should you so desire.

Right to correct or update personal information

Upon request, having provided adequate proof of identity, you have the right to have information held about you corrected or updated if it is not accurate or has changed. To request a correction or to update your personal information, please do this in writing at info@smartonlinetrader.com.

Right to access personal information

You have the right to have access to your personal information.

Right to Opt-Out

If you no longer want to receive marketing messages from us or if you do not want to be contacted by us, please send this written instruction to helpme@smartonlinetrader.com / info@smartonlinetrader.com and you will be 'opted out'.

We are registered members of the DMASA. A data subject may visit the following link to opt out from receiving marketing material or to be contacted by a member of the DMASA <https://www.nationaloptout.org/>

How to contact us

Should you feel that we have in some way not adhered to this policy you can forward any comments or complaints to our Information or Deputy Information Officer.

Information officer: Francois Oosthuizen

Deputy Information Officer: Lizelle Oosthuizen

E-Mail helpme@smartonlinetrader.com / info@smartonlinetrader.com

Contact numbers +27 10 7535 460 / +1 (302) 208 7284

Chatbot Assist: <https://vt.smartonlinetrader.com/>

Details for the Information Regulator

The Information Regulator (South Africa)

Physical Address: 33 Hoofd Street Forum III, 3rd Floor, Braampark, Johannesburg, 2001

P.O Box 31533 Braamfontein, Johannesburg, 2017 Contact Person: Mr. Marks Thibela Chief Executive Officer Tel No. +27 (0) 10 023 5207.

Complaint's email: complaints.IR@justice.gov.za General enquiries email: infoereg@justice.gov.za

Residents outside of South Africa may complain to their local data protection regulator.

Amendments or changes to this Policy

We reserve the right to update or amend this Policy, if necessary, these reasons may include but are not limited to operational, legal, or regulatory reasons.