



# Edge Growth Privacy Notice

POPI Policy / June 2021



**EDGE GROWTH BUSINESS DEVELOPMENT PROPRIETARY LIMITED**

(Registration number 2007/034836/07)

**EDGE GROWTH VENTURES PROPRIETARY LIMITED**

(Registration number 2017/148177/07)

**EDGE GROWTH ACCELERATE PROPRIETARY LIMITED**

(Registration number 2017/124541/07)

**EDGE GROWTH ACCESS PROPRIETARY LIMITED**

(Registration number 2017/124543/07)

**EDGE GROWTH BLUE SKIES PROPRIETARY LIMITED**

(Registration number 2021/516484/07)

**EDGE GROWTH TECHNOLOGY SERVICES PROPRIETARY LIMITED**

(registration number 2018/315303/07)

**Collectively referred to herein as “Edge Group”**

***This is an ever-evolving document, please see our website from time to time for the latest version.***



## INTRODUCTION

All entities within the Edge Group ("**Edge Group**", "**us**", "**we**", or "**our**") are committed to complying with applicable data protection laws and set out below details regarding our approach to data protection in all our operations.

We will only process your personal information in accordance with relevant laws and this Privacy Notice.

This Privacy Notice applies to all our Platforms. "**Platforms**" refers to all our websites, mobile sites, mobile applications, online web applications, tools, software-based services, social media platforms, emails, or any other technology or any other mechanism or means through which you may use to interact with us.

This Privacy Notice describes how we process the personal information we collect and receive from you and the rights available to you in relation to that personal information.

**By using our Platforms and submitting your personal information for processing by the Edge Group in accordance with this Privacy Notice, you agree to the provisions of this Privacy Notice. Should you not agree to the provisions of this Privacy Notice, you should not use our Platforms.**

### 1. Information we collect

#### 1.1. Information you give us

We may collect different types of information about you in the following ways:

We may ask you to provide us with certain information about you. This includes any information (including personal information) that you provide to us directly, whether through our Platforms, phone, data messages, fax or any other medium. This includes, but is not limited to, information you provide to us:

- 1.1.1. by filling in forms on our Platforms (when you sign up for an account or apply to be a participant in an Edge Group programme or apply for funding or when you subscribe or register to use services or access data on our Platforms);
- 1.1.2. when you enter a competition, promotion or complete a survey;
- 1.1.3. by posting or uploading any data, content or comments to our Platforms;
- 1.1.4. when you contact us; or
- 1.1.5. when you otherwise provide information directly to us.

#### 1.2. Information we collect or receive when you use our Platforms

- 1.2.1. We collect information through various means when you use our Platforms. This may include using cookies, web beacons and other tracking technologies. A cookie is a device transmitted to the hard disk of a user. Cookies do not contain intelligible information but allow linking between you and your personal information, such as your IP address and other information about your experience on the website. The information and data are gathered directly and automatically by the **website**. We process information collected by cookies in a collective and anonymous way in order to optimize the website for the needs and preferences of the users. You can manage or disable these tracking technologies in your browser settings. If you have started the procedure of deleting cookies, we cannot ensure that all of our web pages will be displayed and that all of our



services will be available to you. Depending on how you access and use our Platforms, we may receive or collect:

- 1.2.1.1. log information (information about your interactions with our Platforms);

- 1.2.1.2. other services you use, the time and date of your visit, the time spent on a page, the pages you visit, or the content you view and the search queries you submit);
- 1.2.1.3. information we infer about you based on your interaction with our Platforms;
- 1.2.1.4. device information (the type of device you're using, how you access our Platforms, your browser type, browser version, or operating system, diagnostic data and your Internet Protocol ("IP") address);
- 1.2.1.5. location information (your device's GPS signal and information about nearby Wi-Fi networks and cell towers). We get this information when you use location-enabled services. You can disable location services when you use our Platforms, through your device settings;
- 1.2.1.6. data about you or your business, including but not limited to, data that will allow us to determine patterns, trends and/or risks in an industry;
- 1.2.1.7. any other information collected when you communicate with us in any way; and
- 1.2.1.8. Google Analytics (website traffic data –also refer to clause 3.3.9 below).

1.2.2. We are aware that extra protection is afforded to special categories of personal information. We will ensure that the collection and processing of any of the following special categories of personal information is limited and implemented in strict compliance with the additional protective requirements afforded to each category under applicable data protection laws:

- 1.2.2.1. health related information;

- 1.2.2.2. race or ethnic origin;
- 1.2.2.3. political opinions;
- 1.2.2.4. religious or philosophical beliefs;
- 1.2.2.5. trade union memberships;
- 1.2.2.6. genetic or biometric data; and
- 1.2.2.7. sexual life or sexual orientation.

### 1.3. Information from third-party sources

We may receive additional information about you that is publicly or commercially available, or that you consented to us receiving from third parties and combine that with the information we have collected or received about you in other ways. We may also receive information about you when you choose to connect with social networking services while using our Platforms.

We process the information you provide in your curriculum vitae, in our application form and supporting documentation and information during the recruitment process purely for the purposes of assessing your suitability for the role, for contacting you to progress your application and to take up any references you have provided. The basis for the processing of this information is a potential employment contract may be concluded, depending on the outcome of our assessment and we have a legitimate



interest in finding candidates for roles that we have. In the event that you are successful, this data will form part of your employee file.

#### **1.4. Information we collect from you when you apply for a job**

We process the information you provide in your curriculum vitae, in our application form and supporting documentation and information during the recruitment process purely for the purposes of assessing your suitability for the role, for contacting you to progress your application and to take up any references you have provided. The basis for the processing of this information is a potential employment contract may be concluded, depending on the outcome of our assessment and we have a legitimate interest in finding candidates for roles that we have. In the event that you are successful, this data will form part of your employee file.

## **2. How we use the information we collect and receive**

We use the information we collect and receive for the following purposes:

- 2.1. to provide you with information or services you request from us;
- 2.2. to improve and maintain our Platforms;
- 2.3. to be effective and relevant in the services we provide you;
- 2.4. to provide you with support;
- 2.5. to communicate with you;
- 2.6. for purposes of our recruitment processes;
- 2.7. for purposes of processing your application/s for one or more of our programmes (which includes processing required for and related to the pre-qualification and selection processes involved in the adjudication of your application and, where your application is successful, includes processing required and related to your participation in the specific programme);
- 2.8. for purposes of processing your application/s for funding;
- 2.9. internal record keeping and updating our records with changes to your information; to respond to your enquiries and complaints or processing your requests in relation to your information;
- 2.10. to allow you to participate in interactive features of our Platforms when you choose to do so;
- 2.11. to monitor the usage of our Platforms;
- 2.12. making our Platforms easier for you to use and providing you with access to certain parts of our Platforms;
- 2.13. to provide effective advertising (provide you with news, special offers and general information about other services, programmes and events which we offer, that are similar to those that you have already purchased or enquired about);
- 2.14. in connection with competitions and other promotions;



- 2.15. to create anonymized databases and reports, including but not limited to, industry benchmarking and other aggregated reports, trend/pattern reports, risk profile reports, all of which we may provide or sell to our customers or other third parties;
- 2.16. for the detection and prevention of fraud, crime, money laundering or other malpractice;
- 2.17. to conduct market or customer satisfaction research or for statistical analysis;
- 2.18. for audit and record keeping purposes; and
- 2.19. in connection with any legal proceedings.

### **3. How we process and transfer the information we collect and receive**

- 3.1. We don't sell your personal information to third parties.
- 3.2. Personal information held by us is processed by appropriate members of staff for the purposes for which the information was provided.
- 3.3. We may share your information with:
  - 3.3.1. our affiliates, in other words, other companies in our group;
  - 3.3.2. our funds and our investors, where you have applied for funding or where you have provided your consent for us to share your information;
  - 3.3.3. the sponsors, partners and investors of our programmes, where you have applied to be a participant in a programme or where you have provided your consent for us to share your information;
  - 3.3.4. third parties, where we share anonymized data and reports (we share non-personally identifiable information (anonymized data) with our customers or third parties, by using the data we collected to create aggregated and anonymized reports;
  - 3.3.5. third parties, where you provided consent for us to share your information;
  - 3.3.6. other parties in response to legal process, laws, or when necessary to conduct, enforce or protect our legal rights;
  - 3.3.7. other parties in connection with certain business transactions (in the event that we restructure or sell any of our businesses or assets, we may disclose your personal information to the prospective buyer of such business or assets or other transacting party);
  - 3.3.8. companies that provide services to us or you (companies that provide services to us or you, or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you);
  - 3.3.9. Google Analytics (Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Platforms. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about your activities. For more information on the privacy practices of



Google, visit the Google Privacy Terms web page:  
<http://www.google.com/intl/en/policies/privacy/>).

#### 4. Your rights in relation to your personal information

- 4.1. Subject to certain limitations on certain rights, which will be communicated to you if we are not able to grant any request submitted by you in terms of this clause 4, you have the following rights in relation to your personal information:
- 4.1.1. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - 4.1.2. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - 4.1.3. **Withdraw consent** to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
  - 4.1.4. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to ask us not to contact you for direct marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you direct marketing messages if you tell us not to, but we will still send you service-related messages.
  - 4.1.5. **Request correction**: You can update or correct your personal information directly within your account settings section. If you are unable to change your personal information, please contact us to make the required changes.
  - 4.1.6. **Request erasure** of your personal information. If you wish for your personal information to be removed from our systems, please contact us. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).
- 4.2. You should be aware that certain information is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.
- 4.3. You should also be aware that in some instances, if you do not provide information or exercise any rights regarding the deletion or restriction of your information or object to the processing of your information or withdraw consent, we may not be able to proceed with the particular transaction, action or enquiry that is relevant to our information request.



## 5. Monitoring of communications

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about the products and services you use or ask us about, and to meet our legal and regulatory obligations generally.

## 6. Retention of data

- 6.1. We will not retain your personal information longer than the period for which it is needed for the purposes set out in this Privacy Notice and to comply with applicable law.
- 6.2. We determine retention periods in respect of information we hold based on:
  - 6.2.1. legal obligations relating to minimum periods to retain data;
  - 6.2.2. the purposes for which we process the personal information and whether we can achieve those purposes through other means;
  - 6.2.3. whether the information is required for reporting and analysis purposes relating to our operations;
  - 6.2.4. the amount, nature, and sensitivity of the personal information;
  - 6.2.5. the potential risk of harm from unauthorised use or disclosure of the personal information.

## 7. Transfer of data

- 7.1. We are based in and operate from South Africa. Your information, including personal information, may be transferred to and maintained on servers located outside of your country, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.
- 7.2. We may transfer your personal information to places outside of South Africa and store it there, where our suppliers may process it. If that happens, we require our suppliers to apply the same security standards as when we process your information in South Africa.
- 7.3. Your use of our Platforms followed by your submission of such information to us, represents your agreement to such transfer.
- 7.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice and the laws of your country of residence.





## 8. Security of data

- 8.1. We will ensure that all our third-party service providers and other entities within the organisation are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We will not permit them to process your personal information for any purpose other than the purposes specified by us and in accordance with our instructions.
- 8.2. We take appropriate technical and organisational steps to ensure the security of your personal information including policies and procedures around use of technology and devices, IT security, document retention and destruction and data breach procedures. Only persons within our organisation which require your personal information for the performance of their work have access to that information and we do not transfer your information outside of the organisation or your resident country unless we are satisfied that the personal information will be afforded an equivalent level of protection.
- 8.3. Some of our systems are provided by third parties (for example, hosted databases and newsletter, website, survey providers and cloud storage providers). We will ensure that this is always subject to contractual assurances that personal information will be kept securely and only in accordance with our specific directions. We do not share or sell personal information to other organisations for their own purposes.
- 8.4. While we take care of the above –
- 8.4.1. you are responsible for ensuring the security of your username and password information. You must take extreme care not to divulge this information to anyone. In this regard, we will never ask you to disclose your password in an unsolicited communication (whether by telephone or email). You therefore indemnify us against any damages or losses that may result from your failure to ensure the security and secrecy of your username and password information; and
  - 8.4.2. the transmission of data over the internet cannot be guaranteed to be 100% secure and protected. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from via electronic transmission This is particularly true for information you send to us via email, which we cannot guarantee is protected in transit. Once we receive your information, we apply the methods mentioned above to ensure its protection while in our possession. If you are concerned about submitting your personal information to us electronically, please contact us to enquire about making other arrangements.

## 9. Payment service providers

- 9.1. We may provide paid products and/or services on our Platforms. We use third-party services for payment processing.
- 9.2. We will not store or collect your payment card details. That 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 set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.



9.3. The payment processor we work with is Payfast. Their privacy policy can be viewed at <https://www.payfast.co.za/privacy-policy>.

## 10. Links to other sites

- 10.1. Our Platforms may contain links to or from other websites, mobile applications or services of third parties, advertisers or affiliates, that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.
- 10.2. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## 11. Automated decision-making

There may be instances where we process your personal information using automated means. This means that a decision will be made through an automated mechanism with no human intervention.

- 11.1. No decision will be made based solely through automated means where that decision will have a significant impact on you. Where such decisions are made, we will notify you and provide you with clear information regarding why we rely on automated decision making for purposes of the relevant decision to be made and always ensure that the automated decision is implemented in compliance with applicable data protection laws.
- 11.2. Where a decision that is made through automated means, will have a significant effect on you, you will be afforded the right to make representations about such decision. To enable you to make any representations, you have the right to request us to provide you with sufficient information about the underlying logic of the automated processing of the information that relates to you.

## 12. Contact us

- 12.1. If you have any questions regarding this Privacy Notice, or would like to enforce any rights you may have under applicable data protection laws, please contact us at:

Information Officer:	Mr. Daniel Hatfield 010001 3715 DHatfield@edgegrowth.com
Deputy Information Officer:	Matthew Sidebottom 010001 3715 MSidebottom@edgegrowth.com



- 12.2. We will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits in the applicable country. In some instances, we may be able to charge a fee for responding to your request and will advise you of this and any applicable amount prior to responding.
- 12.3. Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.
- 12.4. You also have the right to lodge a complaint with the relevant supervisory authority, details of which are set out below:

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

Mr Marks Thibela

Chief Executive Officer

Tel No. +27 (0) 10 023 5200, Cell No. +27 (0) 82 746 4173

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

### **13. Changes to this Privacy Notice**

- 13.1. We may update this Privacy Notice from time to time. Any changes to this Privacy Notice will be posted on our Platforms and, where appropriate, notified to you by e-mail.
- 13.2. You are advised to visit our website periodically and review our Privacy Notice. Changes to our Privacy Notice are effective from when they are posted on our Platforms.

**March 2021, Version 2**

