

Stash Privacy and Security Statement

This Privacy and Security Statement explains how we collect, disclose and otherwise process personal information securely as required by legislation, applicable regulations and app store policies. Acceptance of these terms is voluntary, but is a requirement for the activation and servicing of the App. If you do not accept these Terms, then we cannot activate and service your Product.

These terms and conditions govern the Tax-Free Investment and the use of the App and should be read in conjunction with Stash Tax-Free Investment Terms and Conditions and the Stash Application Terms.

Your privacy is important to us

We treat personal information collected as private and confidential. You may give us this information yourself or we may collect it from other sources.

We are required to:

- Keep your information secure, confidential and only for as long as is required.
- Only process information as permitted by law.
- Provide you with access to, update or rectify any of your information.
- Notify you if any of your information has been compromised

The App obtains your personal information

Personal information includes, but is not limited to, your name, surname, phone number, email address, health data, information relating to your physical or mental health conditions, your ID number, transaction-related information (such as when you make purchases, respond to offers, how you use the App, card details for the use of the App) that can be used on its own or with other information to identify you.

You hereby authorise and give us and our service providers express permission, as long as required and potentially after your death, to:

- collect any personal, medical, financial and other information about you directly from all available internal and external sources to meet our regulatory obligations, fraud detection, servicing and internal processing purposes;
- collect location data about you. We will not share your current location with other users or partners. **If you do not want us to use your location, you should turn off the location services for the App.** Some features of the Product(s) may not work if you switch off location services;
- collect health data about you. health data can include, but is not limited to: wellness information (e.g., exercise or fitness habits, nutrition, or sleep data), health markers (e.g., blood pressure, BMI, or glucose), information on physical or mental health conditions, insurance or health care information, or information that integrates into or receives information from a personal health record. **If you do not want us to use your health data, you should turn off the permissions in the App or on your device.** Some features of the Product(s) may not work if you switch off health data access;
- for external sources, you agree that this authorisation is considered a legally binding personal instruction to the parties concerned to provide any relevant information requested directly to us; and
- process and share this information internally and externally only as required in order to assess risks, provide terms, service your product, consider claims and conduct research.

How we use your data internally

We process (which includes the use of, sharing and disclosure of your personal information) your personal information in order to:

- Provide the primary service of the App to you;
- Provide services and products to you;
- Meet our responsibilities to you;
- Follow your instructions;
- Inform you of new services and products;
- Make sure our business suits your needs;
- Monitor and analyse your conduct for quality control, fraud, compliance and other risk-related purposes;
- for security, administrative and legal purposes;
- Carry out statistical and other analyses to identify potential market trends and develop new products and services;
- Comply with applicable regulations.

How we share your data externally with third parties

We engage third party service providers to provide managed services to us. When we do this, they have to agree to our privacy principles, associated policies and practices should they need access to any personal information to carry out the services provided.

We will not disclose your personal information to external organisations that are not our service providers, unless you gave us your consent, or unless we may do so by law, or if it is necessary for the conclusion or performance of our agreement with you.

We may compile, use and share any information that does not relate to any specific individual. In other words, your information will be de-identified for such purposes.

Liberty owns and retains all rights to non-personal statistical information collected and compiled by Liberty.

Liberty may disclose such statistical information provided that any statistics shall not contain any personal information of clients/users of the App.

We share your personal information:

- to a third party contracted by us who requires such information to render a service to you and only if such contracted third party maintains the desired level of data compliance;
- as required by law, the public interest or if we believe that disclosure is necessary to protect your and our rights and/or comply with judicial proceedings, court orders, or legal processes;
- with any credit bureau or credit providers industry association with information relating to your creditworthiness or any consumer credit information including but not limited to credit history, financial history, and judgement or default history in accordance with the requirements of the National Credit Act;
- To comply with any applicable data legislation protecting your right to privacy and any other regulatory body or requirement with respect to the processing of Personal Information, applicable to us. Before we share your personal information for any other reason, we will ask for your permission.
- To comply with The Electronic Communications and Transactions Act; The Income Tax Act; The Financial Intelligence Centre Act; The Financial Advisory and Intermediary Services Act; The National Credit Act; The Regulation of Interception of Communications

and Provision of Communication-related Information Act; The Consumer Protection Act; amongst others.

If we are involved in a proposed or actual merger, acquisition or any form of sale of some or all its assets, we may use and disclose your personal information to third parties in connection with the evaluation of the transaction. The surviving company, or the acquiring company in the case of a sale of assets, would have access to your personal information which would continue to be subject to these Terms.

When we may reveal personal information without consent

We will only reveal personal information to third parties without your permission, if:

- We must do so by law or in terms of a court order;
- It is in the public interest; and
- We need to do so to protect your and our rights.

We do not sell your identifiable data to data brokers (companies that collect personal information about consumers from a variety of public and non-public sources and resell the information to other companies), marketing, advertising networks, or analytics firms.

How we store your data

We store your data on the device as well as on our servers or with a cloud computing service. Cloud computing means a kind of Internet-based computing that provides shared processing resources and data to computers and other devices on demand.

How we encrypt your data

We store personal information collected through our App securely and we have taken reasonable steps to ensure that no outside entity can gain unauthorised access to it.

By default, the App encrypts your data:

- in the device or App;
- when stored on our servers or with a cloud computing service; and
- while it is being transmitted.

Encryption means a method of converting an original message of regular text into encoded text in such a way that only authorised parties can read it.

We are committed to providing reasonable secure online services. All use of our App and transactions through it are protected using best industry practice. Our systems are protected to guard against intruders. We have taken reasonable measures to ensure that only authorised individuals can gain access to your information. We have also used independent security experts to test our system security.

You must read the security tips and updates on our App regularly to make sure that you benefit from our security practices.

We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorised employees and contractors who need to know that information to operate, develop or improve our App. Although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. We therefore cannot guarantee that these measures will ensure that your personal information will always be 100% secure.

How the App accesses other data

By using the App, you consent to and acknowledge that the App may collect certain information automatically, including, but not limited to, the type of phone you use, your phone's unique device ID, the IP address of your phone, your operating system, the type of mobile Internet browsers you use.

The App will request access to other device data or applications to be able to connect to:

- Camera
- Photos
- Documents
- Location services
- Health monitoring devices

The App does not allow you to share the collected data with social media accounts.

What you can do with the data we collect

We may retain your personal information until such time as you request us to destroy it (unless we are obliged by law to retain it).

You may ask us to update, correct or delete your personal information.

We have a duty to take all reasonable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To do this, we will always try to obtain personal information from you directly. Where we are unable to do so, we will make use of verifiable independent third-party data sources.

Should you believe that we have utilised your personal information contrary to applicable law, you will first resolve any concerns with us. If you are not satisfied with such process, you have the right to lodge a complaint with the information regulator.

What happens to your data when your account is deactivated

When your account is deactivated, by you or us, your data is retained for as long as is required by legislation and used as stated above until such time as you request deletion unless we are obliged by law to retain it. Deactivation happens when you take action or we cease operation or deactivate your account due to inactivity.

General

By using the App, you consent to the collection and use of your information.

We may amend these terms from time to time. Your continued use of the Product and App is your agreement to these new terms.

We will notify you of policy changes via our website and the App.

Your acceptance of these terms extends beyond your death.

Links to other apps

Our App may contain links to, or from other Apps. We try to link only to Apps that also have high standards and appreciation for privacy but we are not responsible for their security and privacy practices/compliance or their content. We recommend that you always read the privacy and security statements of these Apps.

Cookies

We use cookies on our App. A cookie is pieces of text that are saved on your device browser when you use our App. The cookie is sent back to our server each time you visit our App. Cookies make it easier for us to give you a better experience online. You can stop your browser from accepting cookies, but if you do, some parts of our Apps or online services may not work. We recommend that you allow cookies.

Personal use of emails and notice about checking on emails

Our communication and information systems are for business use. However, we realise that our employees occasionally use our systems for personal use. Personal use includes sending or receiving personal emails within or outside Liberty. We do not accept responsibility for the contents of personal information sent by our employees using our systems. Please note that we reserve the right to intercept, check on and delete any communications created, stored, sent, or received using our systems, according to relevant laws.

Privacy and security statements that apply to specific online services

Different online services or businesses of Liberty may have their own privacy and security policies.

Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at help@stash.co.za or 0860 456 789.