

PRIVACY POLICY

1. INTRODUCTION

1.1 Anew Leasing Services (Pty) Ltd (“us” or “we”) leases a wide range of baby products to its clients and while offering this premium service, we are committed to respecting the privacy of our clients and website users (“you” or “users” or “clients”).

1.2 This Privacy Policy is in place to let you know how we process your information including how we collect, store, use, protect and share your information.

1.3 We take all reasonable steps to protect your personal information in line with the relevant provisions of the Protection of Personal Information Act 4 of 2013 (“POPIA” or “the Act”).

2. TERMS AND CONDITIONS

2.1 By accessing and/or using our website and/or completing our online application form to lease our products, you agree to accept the terms of this Privacy Policy and the Terms and Conditions of use of our website.

2.2 By accepting the terms of this Privacy Policy, you are deemed to have read, understood, accepted and agree to be bound by the terms of this Privacy Policy as well as our Standard Terms and Conditions which can be found on our website.

3. WHEN WILL WE PROCESS YOUR PERSONAL INFORMATION

3.1 We may process your personal information when:

3.1.1 You browse our website; and

3.1.2 When you complete our online application form.

3.2 You consent to us processing all personal information requested by us for the purposes specified in this Privacy Policy.

3.3 We will not process your personal information for any reason other than as set out in this Privacy Policy without obtaining your consent.

4. TYPES OF PERSONAL INFORMATION WE PROCESS

4.1 Personal information has a wide definition, which can be found and read in more detail in the definition of the Act.

4.2 For the purposes of this Privacy Policy, we have referred only to the personal information most likely to be relevant to our services and your use of our website. This in no way limits the intended definition of personal information or the information that we may be required to collect from you in respect of the purposes set out in this Privacy Policy or otherwise required by law.

4.3 When you up visit our website and complete our online application form, we may collect certain information from you including but not limited to:

- 4.3.1 Your name and surname;
- 4.3.2 Your email address;
- 4.3.3 Your mobile number;
- 4.3.4 Your address;
- 4.3.5 Your date of birth;
- 4.3.6 Your IP address;
- 4.3.7 Your credit card information.

5. WHAT WE DO WITH YOUR INFORMATION

5.1 We process the information that you provide us with for the following purposes:

- 5.1.1 To enable you to make full use of all features on our website, including all search functions in relation to our products and services;
- 5.1.2 To enable you to complete and submit your application on our website, to process the application, to approve or reject the application and to contract with us on this basis;
- 5.1.3 For the fulfilment of any electronic payment transactions when paying for our services;
- 5.1.4 To enable us to fulfil our obligations in terms of our contractual agreement(s) with you;
- 5.1.5 To respond to you enquiries and manage our relationship with you;
- 5.1.6 To ensure that our records are kept up to date;
- 5.1.7 To send administrative information including information about policy changes or updates to our terms and conditions;
- 5.1.8 To contact you regarding current or new services offered by us (unless you have opted out from receiving marketing material from us);
- 5.1.9 To improve your experience on our website and our service offering;
- 5.1.10 To comply with any applicable laws or legal requirements;
- 5.1.11 For fraud prevention and assisting in law enforcement;
- 5.1.12 Generally to render the services offered by us on our website.

6. CONSENT TO PROCESS PERSONAL INFOMATION

6.1 By using our website and completing our online application form, you hereby consent to us processing your personal information for the purposes set out in this Privacy Policy.

6.2 If you provide any further information in addition to the minimum information required to use our website and engage our services, you do so at your own risk, and agree that the information provided is accurate and current information and not for the purpose of misrepresentation or impersonation of any other person or entity.

6.3 You are not required to provide any personal information when accessing our website, however, you may voluntarily choose to do so when completing our online application

to lease our products. Should you not agree with the provisions of this Privacy Policy and not consent to the processing of your personal information as detailed in this Privacy Policy, we may be unable to render any services to you.

6.4 If you refuse to provide us with any mandatory information (information required to be obtained by us by law or another lawful obligation), we reserve the right to discontinue the rendering of any services to you.

7. YOUR RESPONSIBILITIES & RIGHTS

7.1 All users / clients accept responsibility for ensuring that the personal information provided to us is both accurate and up to date. Should you send personal information on behalf of someone other than yourself, you warrant that you have their permission to do so in respect of the purposes as set out in this Privacy Policy and are deemed to have accepted the terms of this Privacy Policy on their behalf.

7.2 You have the right to:

7.2.1 Request that we correct, destroy, delete or update any of the personal information that we may have processed in accordance with this Privacy Policy.

7.2.2 Request access to or confirmation of any personal information that we hold about you.

7.2.3 Withdraw your consent to our processing of personal information, unless the processing of such information is in compliance with an obligation imposed on us by law or prevents the proper performing of any contractual obligation that we may have with you.

7.2.4 Object to the processing of your personal information by us unless the processing of such information is required by law.

7.3 In order to ensure that your information is protected, we will require that you verify your identity before accessing your personal information held by us or making any changes or correction to such information.

7.4 Should you no longer want to receive any marketing related emails or other electronic communications from us based on the personal information provided by you, you can opt out from such communications at any time.

8. ACCURACY OF INFORMATION

8.1 We will take all reasonable steps to ensure that all information provided to us when you make use of our website or complete our online application form is secure, responsibly used, correct and treated confidentially.

8.2 While we will try to ensure that all personal information we collect is relevant, accurate, complete and up to date in accordance with our legal obligations, we may from time to time, request that you update and review your personal information to ensure that it is accurate.

9. DISCLOSURE OF PERSONAL INFORMATION

9.1 We may disclose your personal information in certain instances set out in this Privacy Policy or where we are required to do so by law.

9.2 We shall not without your express consent, disclose your personal information to any third party nor will we use, sell, trade, or otherwise transfer any of your personal information to any third parties, other than as set out below:

- 9.2.1 To our third-party service providers who require such information in assisting us with fulfilling our obligations and in respect of the purposes listed in clause 5.1.1 – 5.1.12 above, provided such employees and/or third party service providers agree to keep such information confidential;
- 9.2.2 If we have a legal or contractual duty to provide the information to a third party;
- 9.2.3 If required to do so by law in terms of applicable legislation including but not limited to the Protection of Personal Information Act;
- 9.2.4 To third-party service providers who may assist us with the operation and maintenance of our website or with the communication with our users;
- 9.2.5 To our service providers contracted under us to assist with business operation, fraud detection and prevention, marketing and other technology services;
- 9.2.6 Credit bureaus to report account information, as permitted by law;
- 9.2.7 To law enforcement, government officials, fraud detection agencies or other third parties in instances where we believe it is necessary in good faith, to disclose personal information of our users to prevent physical harm or financial loss, to report to support the investigation into suspicious or suspected illegal activity or the violation of this Privacy Policy or the Terms and Conditions of our website.

9.3 Should we want to share your personal information for any other reason not listed above, we will not do so without first obtaining your prior consent.

10. COLLECTION OF ANONYMOUS INFORMATION AND COOKIES

10.1 In addition to the information that you provide to us in order to engage our services, when you browse our website we may place small files referred to as 'cookies' on your computer or device.

10.2 Cookies allow a small amount of information to be held by us related to your device in order for us to link your information with a particular device, but do not collect any other personal information about you.

10.3 Cookies have important functions which include but are not limited to the following:

- 10.3.1 Personalizing your experience by letting us remember your preferences;
- 10.3.2 Improving our website performance based on feedback by our users;
- 10.3.3 Allowing third parties to provide services to our website; and
- 10.3.4 Email marketing or targeted advertising where applicable and appropriate in compliance with the applicable provisions and restrictions of relevant laws.

10.4 Cookies which are generated when you visit our website can be accessed both by us and by you and can easily be deleted from your device.

10.5 In the event that you elect to either delete cookies or to change your device settings related to cookies, you accept that you may no longer be able to access all functions or aspects of our website.

11. THIRD PARTY WEBSITES

11.1 Once you leave our website or are re-directed to any third-party website or application, you are no longer governed by this Privacy Policy or the Terms and Conditions of our website and are advised to consult the policies of such third-party websites.

11.2 We will not be held liable or responsible for any loss or harm suffered by you whether directly or indirectly as a result of disclosing such information to any third-party, including in respect of the failure of such third-party to lawfully process any information provided to them by you.

12. THIRD PARTY SERVICES

12.1 Anew Leasing is an online platform designed to facilitate the leasing of specialized baby products, enabling our clients to make use of our wide selection of products as and when the need arises. We makes use of..... to facilitate payment when you engage our services.

12.2 Any payment or other personal information required from you by in order to process such payment, is not governed or regulated by this Privacy Policy or the Terms and Conditions of our website, and you are encouraged to familiarize yourself with the policies and terms of such third-party service provider.

13. SECURITY AND RETENTION

13.1 While we are in possession of your personal information, all necessary measures are in place to ensure that:

13.1.1 Your personal information is treated as strictly confidential, save for the provisions regarding disclosure of personal information as contained in this Privacy Policy;

13.1.2 Your personal information is stored in a secure manner and is protected against unauthorized or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or unauthorized access;

13.1.3 You are notified as soon as reasonably possible in the event that we become aware of any possible or actual threats to the privacy and confidentiality of your information, any unauthorized access, use or processing of your information;

13.1.4 Upon your written request, any and all personal information held by us is either returned or destroyed save for any information required by law to be retained by us.

13.2 Your personal information shall not be retained or stored by us for a period longer than for which it was originally obtained and required, unless we are required to do so by law or you consent to such information being retained by us for a longer period.

14. AGE OF CONSENT

14.1 By using our website, you warrant that you are 18 years of age or older and of full legal capacity. If you are under the age of 18 or if you are not legally permitted to enter into a binding agreement, then you may use only with the involvement and supervision of your parent or legal guardian.

14.2 If your parent or legal guardian supervises you and gives his/her consent, then such person agrees to be bound by this Privacy Policy and to the Terms and Conditions of our website and to be liable and responsible for you and all your obligations under this Privacy Policy and our Terms and Conditions.

15. CHANGE OF POLICY

15.1 We reserve the right to make changes to and/or update any of the terms in this Privacy Policy at any time.

15.2 If you opt out of receiving electronic updates from us, you accept responsibility for ensuring that you are aware of any changes made to this Privacy Policy, and thereby accept the updated terms. The most recent version of this Privacy Policy will always appear on our website.

16. DISCLAIMER & INDEMNITY

16.1 The use of <https://a-new.co.za/> and the engaging of our services is entirely at the risk of the user and the user assumes full responsibility for any risk to or loss of personal information resulting from the use of the website or as a result of the reliance on any information provided or displayed on the website.

16.2 While we undertake to do all things necessary to protect your rights of privacy and to protect your personal information, we cannot guarantee nor do we accept any liability whatsoever for the unauthorized or unlawful disclosure of any user or user's personal information by us or any third parties who are not subject to our control, while such information is in our possession, unless such disclosure is as a result of our gross negligence.

17. CONTACT INFORMATION

For more information or to access, correct, amend, delete or update any personal information or to register a complaint, you may contact our Information Officer at nina@a-new.co.za or lushinka@a-new.co.za.