

# .Altify

## Privacy Policy

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### Version History

Version	Release Date	Notes
1.0	5 September 2023	Original version

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## Introduction

This **Privacy Policy** (the Policy) explains the way in which Revix SA OpCo (Pty) Ltd and Revix International Limited (hereinafter referred to individually or collectively as "Altify"), collect, use, share, and protect Personal Information of Users ("you") obtained through altify.app ("Website"), any related applications (including but not limited to the mobile one) and exchange tools integrated into third-party services ("Services"). The terms "we," "us," and "our" refer to the entities indicated below.

We are fully committed to respecting privacy and to protecting any information that our clients provide. Your privacy and security are both our highest priorities and we make every effort to ensure that all the information provided by you is protected.

We follow and comply with best practices and regulations in the sphere of privacy including but not limited to South Africa's Protection of Personal Information Act (POPIA).

By using the Altify platform you acknowledge and agree to the Privacy Policy which is set out below.

Personal information for the purposes of this document means all information specific to you, which is provided to us through the use of our app. In other words, information that identifies you. This includes but is not limited to the following personal information that you may provide to us when using the app:

1. Your name and surname;
2. RSA identity number or date of birth;
3. Contact numbers;
4. E-mail address.

By using any of the services on our app you hereby consent that we may send you promotional material or details which we think may be of interest to you.

### 1. Use of Personal Information

Altify may use and disclose your personal information in the following manner:

1. by the use of your email address and/or mobile phone number to contact you from time to time relating to promotions and offers, to send you notifications, and for security reasons;
2. to aggregate statistics and data about the use of Altify and/or to customise the Altify's content, layout, and services;

3. by the aggregation of your personal information with other people's personal information to create and disseminate, as Altify considers appropriate, as aggregated data without specific identification or your unique personal data;
4. to verify your identity in accordance with Know Your Customer (KYC), Anti-Money Laundering (AML), and sanctions screening requirements.

You may at any time, via written notice to Altify, require that we do not disclose your personal information in the manner contemplated above, in which case Altify will not do so, but Altify may, on the basis of operational requirements, preclude your use of our services.

You may opt-out of receiving promotional communications from Altify but you may still receive non-promotional communications from Altify relating to your account and services provided to you.

All payment/transaction information will be conducted by electronic funds transfer (EFT). Altify shall retain a user's Designated Bank Account details for utilisation in respect of the user's withdrawals as and when required.

We will not collect, use or disclose sensitive information (such as information about racial or ethnic origins or political or religious beliefs, where relevant) except with your specific consent or in the circumstances permitted by law.

**By Agreeing to the Terms Contained in This Privacy Policy, You Consent to the Use of Your Personal Information in Relation to:**

1. Developing a Altify client profile;
2. The provision and performance of the services;
3. Informing you of changes made to our website, services, and platforms;
4. Responding to any queries or requests you may have;
5. Developing a more direct and substantial relationship with you for the purposes described in this clause;
6. For security, administrative and legal purposes; and
7. The creation and development of market data profiles that may provide insight into market norms, practices, and trends to help us improve our offering to you. Such information will be compiled and retained in aggregated form, but shall not be used in any way which may comprise the identity of a user.
8. Marketing of our services and other related offerings to you;

9. Understanding general user trends and patterns so that we can develop and support existing and ongoing marketing strategies;

Although absolute security cannot be guaranteed on the internet, Altify places great importance on the security of your Personal Information and has in place technical and organisational security measures to protect your Personal Information against accidental or intentional manipulation, loss, misuse, destruction, or against unauthorised disclosure or access to the information we process online.

Altify is allowed to contact you via email, push notification, Whatsapp, phone calls, text message, or other forms of communication to inform you of offers, product information, special offers, discounts, and competitions.

Please note that you will not be allowed to use the services unless you consent to us using your information for marketing purposes in the future.

By using the Altify you consent that select non-monetary information relating to your investing preferences, performance, holdings, personal information, and connectivity will be shown to other users in the interest of transparency and treating other community members fairly.

All information collected is processed solely for the purpose it is obtained, namely offering and providing Altify services and products to users.

Data collected is done so in accordance with the [POPI Act](#) and is processed and utilised in accordance with POPIA requirements.

## **2. User-Generated Content**

You are solely responsible for your conduct and any data, text, files, information, usernames, images, graphics, photos, profiles, audio, and video clips, sounds, musical works, works of authorship, applications, links, and other content or materials (collectively, "Content") that you submit, post or display on or via the Service.

You must not create or submit unwanted emails, comments, likes, or other forms of commercial or harassing communications (a/k/a "spam") to any Altify users.

By using our Service you understand and agree that we are providing a platform for you to post content, including photos, comments, and other materials ("User Content"), to the Service and to share User Content publicly. This means that other Users may search for, see, use, or share any of your User Content that you make publicly available through the Service, consistent with the terms and conditions of this Privacy Policy and our Terms of Service.

## **3. Automatically Collected Information**

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, information about the phone you are using and information about the way you use the Application.

When you visit our application, we may use GPS technology (or other similar technology) to determine your current location in order to determine the city you are located within. We will not share your current location with other users or partners.

If you do not want us to use your location for the purposes set forth above, you should turn off the location services for the mobile application located in your account settings or in your mobile phone settings and/or within the mobile application.

We use third-party analytics tools to help us measure traffic and usage trends for the Service. These tools collect information sent by your device or our Service, including the web pages you visit, add-ons, and other information that assists us in improving the Service. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User.

#### **Do Third Parties See and/or Have Access to Information Obtained by the Application**

Yes. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided and Automatically Collected Information as required by law, such as to comply with a subpoena or similar legal process; when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them and have agreed to adhere to the rules set forth in this privacy statement.

#### **4. Data Retention Policy, Managing Your Information**

There may be links from the Service, or from communications you receive from the Service to third-party websites or features. There may also be links to third-party websites or features in images or comments within the Service. The Service also includes third-party content that we do not control, maintain or endorse. Functionality on the Service may also permit interactions between the Service and a third-party website or feature, including applications that connect the Service or your profile on the Service with a third-party website or feature. For example, the Service may include a feature that enables you to share Content from the Service or your Content with a third party, which may be publicly posted on that third party's service or application.

## **5. Data Protection**

We will retain User-Provided data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to 72 months and thereafter may store it in aggregate. If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at [support@altify.app](mailto:support@altify.app) and we will respond in a reasonable time. Please note that some or all of the User-Provided Data may be required in order for the Application to function properly.

## **6. Children**

We do not use the Application to knowingly solicit data from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [support@altify.app](mailto:support@altify.app). We will delete such information from our files within a reasonable time.

## **7. Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect the information we process and maintain. For example, we limit access to this information to authorised employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent, excluding in-app information relating to your insurance/ asset activity.

If at any stage, after you have given us your consent, you no longer wish that we use your personal information, you may at any stage withdraw your consent by uninstalling the Altify app from your mobile device and notify us either telephonically or by email of the withdrawal of your consent.

We have the highest regard for the privacy of the personal information obtained through the use of our app and therefore will only use the personal information obtained subject to the Terms and Conditions of this agreement and for the purpose for which it was collected and only for the purposes of positively identifying the user when the app is accessed as well as in order to quote you.

We value the information you chose to provide and which we collect from you and will take reasonable steps to protect your personal information from loss, misuse, or unauthorised alteration.

The information we maintain concerning you is stored in databases that have built-in safeguards to ensure the privacy and confidentiality of that information.

In this regard, however, we cannot guarantee the security of any personal information that you disclose through our app. You, therefore, accept the inherent risk of providing information when using our app and will not hold us, our directors, employees, or agents responsible for any breach of security.

The following are the instances when we will be entitled to disclose the personal information obtained from you:

1. When any regulatory authority for the various financial sectors requests same; To comply with any regulation passed under relevant legislation, or any legal process;
2. To enforce and protect our rights and property (including intellectual property);
3. When you have expressly authorised us to do so.

Please ensure that you have read and understood the Terms and Conditions of this Privacy Policy before you provide us with your personal information.

We reserve the right in our sole discretion to amend this Privacy Policy from time to time. You agree to review the Privacy Policy whenever you visit our app for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.