

MyAll Pty Ltd Registration number: 2024/494838/07

(“MyAll”):

Privacy Policy

This Privacy Policy explains how MyAll collects, uses, maintains, and discloses information from users (each, a "User") of the website www.myall.co.za (the "Website"). The policy applies to the Website as well as all products and services offered by MyAll.

General

MyAll has appointed a data representative responsible for overseeing questions regarding this Policy. For any inquiries or requests to exercise your legal rights, please contact the representative using the details provided below.

Full name of legal entity: MyAll (Pty) Ltd, **Registration number:** 2024/494838/07

- **Name and title of data representative:** name: Charles Schreuder- Information Officer registered at the South African Information Regulator's office
- **Email address:** reporting@myall.co.za
- **Postal address:** CBC House, 261 Surrey Avenue, Randburg

You have the right to file a complaint with the South African data regulator's office (Information Regulator's Office of South Africa). However, we would appreciate the opportunity to address your concerns first, so please contact us initially.

The Website may contain links to third-party websites, plug-ins, and applications. Engaging with these may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or terms. When you leave our Website or interact with third parties, we encourage you to review their distinct privacy policies.

Personal Identification Information

We may collect personal identification information from Users in various ways, including when Users visit our Website, fill out a form, or use other services, features, or resources available on our Website. We may ask for information such as name, email address, phone number, etc. We collect personal identification information only if users voluntarily provide it. Users may decline to provide personal information, which might limit their access to certain Website -related activities.

Non-personal Identification Information

We may collect non-personal identification information about users when they interact with our Website. This information may include the user's browser name, computer type, and technical details



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about their connection to our Website, such as the operating system and Internet service provider. Additionally, we may gather other similar information.

Collection of Personal Information

We will process your personal information in the following circumstances:

- When you contact us for products and/or services online, by phone, or by email
- When you send us supporting documentation for advice, appointments, or other information
- When you access our Website, which may use DB sessions (see below for details)
- When you register for our newsletter, request a quote, or make an inquiry
- When you interact with our employees or account managers at events such as presentations, trade shows, or conferences
- When you participate in surveys
- When you engage with us on social media

Web Browser DB Sessions

The Website may use "DB sessions" to enhance the User experience. DB sessions store session information securely on our server, and a unique session ID is stored on your web browser. DB sessions help us recognize repeat visitors, track usage patterns, and compile aggregate data to improve our Website. The information collected by DB sessions is not used to personally identify you. You can manage your session by adjusting your browser settings, but this may limit your ability to use certain features of the Website.

How We Use Your Personal Information

MyAll may collect and use users' registration information for the following purposes:

We process your registration information strictly for our legitimate business purposes and as a necessary function of your engagement with the Website and/or our Services. By using our website and/or Services, you consent to this processing. However, we will not use your registration information without your express consent, except for the purposes outlined below:

- To provide you with Services and/or access to the Website.



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- To fulfill orders for products and Services.
- To offer telephonic or email support.
- For internal record-keeping and the development of metrics for responsible third-party searches.
- To contact you about current or new Services or any other product offered by us or any of our divisions and/or partners (unless you have opted out of receiving marketing material from us).
- To inform you of new features, special offers, and promotional competitions offered by us or any of our divisions and/or partners (unless you have opted out of receiving marketing material from us).
- To enhance our product selection and your experience on our Website by monitoring your browsing habits or tracking your activities on the Website.

We may share your personal information with third parties only as detailed below:

- To our employees and/or third-party service providers who assist us in interacting with you via our Website, email, or any other method, for your use of the Services. These parties need to know your personal information to communicate with you effectively.
- To our professional service providers (such as insurers or lawyers) when we believe it is required under our contractual relationship with our insurance provider.
- To law enforcement, government officials, fraud detection agencies, or other third parties when we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity or the violation of applicable law, or to investigate breaches of this Policy and/or the Website's other policies.
- To our service providers (under contract with us) who assist with parts of our business operations (delivery service providers, fraud prevention, marketing, technology services, etc.). Our contracts ensure that these service providers may only use your information in connection with the services they perform for us, not for their own benefit, and under the same standards as how we operate.

All personal information disclosed will always be kept to a minimum and strictly for the original purposes acquired, or to satisfy the minimum requirements of a party to whom it is disclosed. We will never provide your personal information to any third party unless it is absolutely necessary.



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Our Legal Basis for Processing Your Personal Information

We may use or disclose your registration information when necessary to comply with applicable laws, subpoenas, court orders, or legal processes served on us, or to protect and defend our rights or property. In cases of fraudulent online payments, MyAll reserves the right to disclose relevant personal registration information for criminal investigations or as required by legal obligations.

Legal Justifications for Processing

By using the Website and/or our Services, you explicitly consent to our processing of your personal registration information. Additionally, we rely on our contractual agreements with you as the lawful basis for collecting and processing your personal registration information when you order Products and Services.

Alternatively, in some instances, we rely on our legitimate business interests (e.g., measuring customer satisfaction, resolving customer issues) when processing your personal registration information. Whenever we rely on these interests, we ensure they are balanced against your rights.

Reasons for Processing Your Personal Information

Subject to the other provisions of this Policy, the following outlines the reasons for processing your personal information:

- **Internal Business Purposes:** We use your personal registration information for administrative purposes such as order fulfillment, invoicing, project management, and internal reporting.
- **Website Optimization:** Your registration data helps us monitor Website usage and ensures our Website is presented in the most effective and relevant manner for you and your device, including setting default options.
- **Legitimate Business Interests:** It is in our legitimate interests to use your personal registration information to maintain a customer-friendly Website, ensure efficient Products and Services, and facilitate easy interaction with us.
- **Security and Compliance:** We use your personal registration information to verify the accuracy of personal and financial information, conduct fraud checks, prevent illegal activities, protect our rights and property (and those of others), and fulfill legal and compliance obligations.
- **Legal Obligations:** In cases where legally required (e.g., responding to law enforcement requests, appointing arbitrators in disputes), we process your personal registration information to comply with these obligations.



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- **Legitimate Interests:** We rely on our legitimate business interests to use your personal registration information, especially in fraud detection scenarios. When doing so, we always ensure these interests are balanced against your rights.
- **Administrative Communications:** We may send you administrative messages and email updates regarding the Website or any changes to it for your information, action, and records.

This approach ensures that we handle your personal information responsibly, respecting both legal requirements and your rights.

Protection of Personal Information

We adopt appropriate data collection, storage, and processing practices to protect against unauthorized access, alteration, disclosure, or destruction of your personal information. Our website is hosted in a secure server environment with advanced security measures.

Sharing of Personal Information

We may also create and share anonymised and aggregated datasets with trusted business partners, affiliates, and service providers. This information may be used for analytics, research, and marketing insights. All partners are contractually prohibited from attempting to re-identify users, reselling, or using the data outside the agreed purpose. Where aggregated data is combined with identifiers, it will be treated as personal information.

We will only use anonymised and aggregated information for partner marketing where you have provided explicit opt-in consent. You may withdraw this consent at any time in your account settings, without affecting your access to the core MyAll services.

User Rights and Responsibilities

As a user, you have the right to request access to any relevant information held by MyAll that is necessary for you to exercise and protect your rights. For personal information held by third-party responsible parties, please contact them directly to assert your personal information rights, as MyAll may not have direct control over their data processing.

Under POPIA (Protection of Personal Information Act), you are entitled to the following rights regarding your information. Please contact us to learn more about or exercise these rights:

- Have your data processed in a fair, lawful, and transparent manner.
- Be informed about how your personal information is used, as outlined in this privacy policy.



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- Access the personal registration information we hold about you.
- Request corrections to any inaccuracies in your personal registration information.
- Request deletion of personal registration information in certain circumstances where continued processing is unnecessary.
- Object at any time to the processing of your personal registration information for direct marketing purposes.
- Object to automated decision-making processes that significantly affect you.
- Object to our continued processing of your personal information in certain situations.
- Alternatively, restrict or temporarily suspend our processing of your personal information in certain circumstances.

There is no fee for accessing your personal information or exercising your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. In such cases, we may also refuse to comply. To ensure your information remains secure, we may request specific details from you to verify your identity before providing access or making any corrections.

We strive to respond to all legitimate requests within one week. If your request is particularly complex or if there are multiple requests, it may take longer, in which case we will notify you and keep you updated.

For users outside South Africa, please note that MyAll adheres to South African data protection laws when processing your personal information related to our Services. If foreign laws apply to your use of our Services or how we process your personal information, please contact us at reporting@MyAll.co.za for clarification on its application and your rights.

By accepting this Policy, you consent to receive emails from MyAll. Your email address will be used to contact you periodically and for security purposes to verify your identity. You have the right to opt out of receiving email communications by following the instructions in each email or by contacting hello@MyAll.co.za to request no further contact.

Rights of MyAll Regarding Personal Information

MyAll may disclose your personally identifiable information if we reasonably believe it is required by law, regulation, or other governmental authority, or to protect the rights and property of MyAll, its affiliates, or the public. We may also cooperate with law enforcement in official investigations and disclose your personally identifiable information to relevant agencies or authorities as necessary.



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Additionally, we collect, use, and share aggregated or de-identified data, such as statistical or demographic data, for various purposes. This type of data does not directly or indirectly identify you and is not considered personal information under the law. For example, we may analyze usage data to determine the percentage of users accessing specific features of our website. However, if we combine aggregated data with your personal information in a way that it can directly or indirectly identify you, we treat the combined data as personal information and handle it according to this Privacy Policy.

Users acknowledge that unauthorized use of MyAll's information systems violates the MyAll General Terms and applicable laws, including Section 86 of the Electronic Communications and Transactions Act, 2002. Such violations may result in civil and criminal penalties.

MyAll reserves the right to intercept, monitor, block, filter, read, delete, and disclose any communication over its private information systems as necessary.

Changes to This Privacy Policy

MyAll may update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users to review this policy periodically to stay informed about how we protect the personal information we collect.

Acceptance of These Terms

By using this Website, you indicate your acceptance of this Privacy Policy. If you do not agree with this policy, please refrain from using our Website. Continued use of the Website following any changes to this policy will be deemed as your acceptance of those changes.

Contacting Us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

- **Name and title of data representative:** person name: Charles Schreuder, Information Officer registered at the South African Information Regulator's office
- **Email address:** reporting@myall.co.za
- **Postal address:** All formal communications should be directed via email to the businessspecific email address provided. Further contact details, including a physical address, will be supplied upon request or for official correspondence as necessary.

Policy for Providing Information to Executors on User's Passing



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Frequently Asked Questions (FAQ)

1. Why does MyAll have this policy? MyAll has established this policy to address the sensitive handling of user data, especially in cases where the user has passed away. Ensuring privacy and complying with legal requirements is paramount for MyAll, and we have protocols to securely provide information to the designated executor.

2. What steps does MyAll follow?

2.1 User Consent and Data Retention Policy: MyAll requests explicit consent from users to share their data with their nominated executors or legal representatives after their passing. Users are required to provide verification information about the nominated person. For security reasons, additional undisclosed procedures are in place. Users are responsible for notifying their nominee, who can contact us via email after the user's passing to gain access.

2.2 Verification Process for the User's Nominated Executors: MyAll has a thorough verification process to ensure that only the nominated executor or legally authorized representative can access the deceased user's data. Necessary documents, such as a death certificate and legal authorization papers, are required to establish identity and authority.

2.3 Secure Communication: MyAll uses secure communication channels to interact with the nominated executor and/or the trusted contact.

2.4 Data Segregation and Encryption: Various protection mechanisms, including firewalls and encryption algorithms, are in place to safeguard information and prevent unauthorized access.

2.5 Designated Contact Person: MyAll has designated a specific individual and department to handle such requests. A senior attorney from our legal division oversees the verification process and authorizes data access to the nominated executor or user-chosen individual.

2.6 Time Limitations: Data is stored for three months for the trusted contact to access upon the user's passing, allowing a seamless transition and sufficient time for the nominated executor to initiate the verification process.

2.7 Audit Trail: MyAll maintains a detailed audit trail of user nominations and correspondence during the verification process. When contacted by a nominated person, we attempt to reach the user through the latest contact details to verify the user's passing.



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2.8 Secure Data Transfer: Upon successful verification, MyAll securely transfers the user's data to the nominated executor and/or trusted contact using secure methods.

2.9 Sensitive Handling of the Verification Process: MyAll handles data after a user's passing with great sensitivity, prioritizing privacy and security throughout the verification process. We strive to show empathy and compassion towards the family and loved ones of the deceased user.

MyAll's Commitment to Security in Accordance with the Protection of Personal Information Act (POPIA) Frequently Asked Questions (FAQ)

Why does MyAll have this guide? This guide provides transparency about the security measures MyAll has implemented to protect user data, while balancing the need for confidentiality to prevent potential security threats. We offer a high-level overview of our security measures and are willing to share more detailed information in a secure manner during a security review or engagement with a cybersecurity professional.

What if more information is required? If more technical details are needed, we can provide such information in a controlled and secure manner, ensuring that transparency does not compromise security.

Guide to MyAll's Commitment to Security: MyAll is dedicated to safeguarding the privacy and security of our users' data. Our platform is designed with comprehensive security measures to protect against potential threats. In the event of unauthorized access or serious security breaches, MyAll will act promptly, considering legal requirements and necessary measures to restore the integrity of our information systems.

In accordance with POPIA, we will notify both the Information Regulator and the user in the event of a breach, providing adequate information to enable protective measures. We also ensure compliance with sections 20 and 21 of the POPIA by establishing data processing agreements with Operators responsible for processing Personal Information on our behalf.

Security Features Implemented by MyAll:

- Password Hashing:** Advanced techniques to securely store and manage user passwords.
- DB sessions Protection:** Encryption keys safeguard user DB sessions, enhancing session security.
- Encryption:** Strong mechanisms ensure the confidentiality and integrity of sensitive data.
- Session Management:** Secure practices enhance user privacy and minimize vulnerabilities.



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- **Secure Queries:** Advanced query builders and ORM practices prevent injection attacks.
- **File Security:** Restricted access ensures only authorized files are accessible via the web interface.
- **Additional Measures:** Ongoing monitoring and updates adapt to evolving threats and best practices.

For more detailed information, please contact our support team at reporting@myall.com. Thank you for entrusting MyAll with your data. We remain committed to providing a secure and reliable platform for all our users.

Guide to South Africa's Protection of Personal Information Act (POPIA or POPI Act)

Frequently Asked Questions (FAQ)

Why does MyAll have this policy? MyAll has implemented this policy to ensure the secure handling of user data, particularly in cases involving the passing of a user. Privacy and legal compliance are paramount at MyAll, and we take steps to securely provide data and information to the user's designated trusted contact for estate matters upon their passing.

This guide provides an overview of POPIA's purpose and principles, focusing on safeguarding user and minor children's personal information. It outlines MyAll's responsibilities to comply with POPIA, ensuring the responsible handling of user and, if applicable, their minor children's personal information.

The guide aims to promote the protection of user information and establish regulations in accordance with relevant standards. It details MyAll's procedures for processing personal information while emphasizing privacy rights and lawful handling as required by South Africa's Protection of Personal Information Act (POPIA or POPI Act).

What is POPIA? The Protection of Personal Information Act, known as POPIA or POPI Act, is legislation designed to safeguard individuals' privacy rights regarding their personal information. Grounded in South Africa's constitutional principles, particularly section 14 of the Constitution, POPIA affirms every individual's right to privacy and protection against unlawful collection, retention, dissemination, and use of personal information.

The Act applies to the processing of personal information by both public and private entities, aligning with international norms while balancing privacy rights with other significant interests.

When did POPIA take effect? POPIA officially came into effect on July 1, 2020, as announced by the President of South Africa.



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What is the scope of POPIA? POPIA governs the processing of personal information inputted into records by or on behalf of users, whether through automated or non-automated means.

Whose personal information does POPIA refer to regarding MyAll's website? POPIA applies when a user is domiciled in South Africa or when their personal information is used within South Africa, irrespective of their domicile.

What constitutes personal information? According to section 1 of POPIA, personal information includes details that identify an individual or a juristic person. This encompasses various aspects such as demographic data, biometric information, opinions, and correspondence.

What is MyAll's role under POPIA? As a responsible party under POPIA, MyAll processes user information adhering to the Act's eight conditions for lawful processing. These principles guide MyAll's handling of personal information, requiring voluntary consent from data subjects or users on MyAll's online platform.

Who is the South African Information Regulator? The Information Regulator, established under section 39 of POPIA, oversees compliance with the Act and promotes access to information.

What are the Regulator's functions, powers, and duties? The Regulator's responsibilities include public education on POPIA objectives, monitoring compliance, facilitating conflict resolution, handling complaints, and issuing codes of conduct.

What are my rights under POPIA? Users have rights including access to their personal information, correction of inaccuracies, objection to processing for marketing, and protection against automated decision-making.

What security measures must MyAll implement for personal information? MyAll is required to implement reasonable measures to safeguard personal information against loss, unauthorized access, or processing.

What are the responsibilities of operators under POPIA? Operators processing personal information on behalf of MyAll must do so with authorization, treat data confidentially, and maintain security measures as outlined in their contract with MyAll.

How are serious security breaches handled under POPIA? In case of serious security breaches, MyAll must notify affected users and the Regulator promptly, providing necessary details and protective measures.

When does POPIA not apply to personal information processing? POPIA exemptions include personal information processed in purely personal activities, de-identified data, and certain information related to national security or judicial functions.



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This summary aims to clarify your rights and MyAll's obligations under POPIA, ensuring transparency and compliance with South Africa's data protection laws. For further details or to exercise your rights under POPIA, please contact us at MyAll.

MyAll Password Policy and FAQs Supporting the Policy

Frequently Asked Questions (FAQ)

1. Why does MyAll have a password policy?

At MyAll, we prioritize the security of your accounts and information. Our password policy is designed to ensure that your passwords are strong, unique, and protected against unauthorized access attempts. By adhering to this policy, we bolster our defenses against potential security threats.

2. What are the requirements for creating a password on MyAll?

Your password must meet the following criteria:

- Minimum length of 15 characters.
- Includes a combination of uppercase letters (A-Z), lowercase letters (a-z), numbers (0-9), and special characters (e.g., !@#\$%^&*()_-+=).

3. What should I avoid when creating a password?

To enhance your password's security, avoid using:

- Common words or variations thereof.
- Sequential lists of numbers or letters (e.g., "abcde" or "12345").
- Personal details like your name, ID number, or birthdate.
- Strings of repeated characters (e.g., "aaaaa" or "0000").

4. Can you provide some examples of strong passwords?

Here are examples using different methods:

- Modified Phrase:** Original: "Dunkin' Donuts is great for summer" → Password: "Dunkisgr84\$umm3R."
- Interspersed Words:** Original: "books 930 Pleasant" → Password: "b00K\$930PL3^S^n+."
- Acronym from Quote:** Original: "Two things are infinite..." → Password: "2Trl&h\$;&Ins@tU."



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These methods create robust, unique passwords that are difficult for unauthorized users to guess.

5. How are passwords stored on MyAll?

Passwords are stored securely using advanced encryption algorithms and are protected by firewall and access rules.

6. What can I do to improve my password security?

In addition to following our password policy, you can:

- Educate yourself on password security best practices.
- Report any suspicious login attempts or security incidents to our support team.

7. Why is MyAll's password policy essential for me?

Adhering to our password policy enhances the security of your online activities and safeguards your personal information. Strong passwords are crucial for maintaining a secure online experience.

8. Where can I find MyAll's full password policy?

You can access our comprehensive password policy in the section below.

For further questions or concerns regarding password security or our policy, please contact our support team at reporting@myall.co.za. We are here to ensure the utmost security for your MyAll account.

Password Policy: Safeguarding Your Account with Strong Passwords

MyAll is committed to protecting user accounts through a rigorous password security approach. Our policy ensures the confidentiality, integrity, and availability of user passwords, reinforcing the overall security of our platform.

1. Password Complexity and Length ○ Minimum password

length: 15 characters.

- Requires a mix of uppercase letters, lowercase letters, numbers, and special characters.



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2. User Communication

- The FAQ section outlines specific password creation requirements to guide users in setting secure passwords.

3. Secure Password Storage

- Passwords are securely encrypted and stored using advanced techniques to prevent unauthorized access.

4. User Education and Awareness

- MyAll educates users on password security best practices and encourages reporting of security incidents.

5. Monitoring and Auditing

- We regularly monitor and audit password-related activities to detect and respond to potential security threats.

6. System-Level Protections

- Measures are in place to defend against common attacks such as brute force and dictionary attacks.

7. Compliance and Documentation

- Our password policy is documented to ensure adherence and is regularly updated to address evolving security threats.

By following these measures, MyAll aims to ensure the highest standards of password security, protecting user accounts effectively.

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This version outlines MyAll's commitment to robust password security while providing clear guidelines and examples for users.

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