

<b>Document No:</b>	SD 106 A
<b>Document Name:</b>	Terra Analytics (Pty) Ltd Privacy Policy
<b>Effective Date:</b>	01 February 2021
<b>Developed By:</b>	CF&HC
<b>Reviewed By:</b>	CF&HC

Revision History			
Description of Changes:	New Version No:	Date Changed:	Changed By:
1. Document creation	A	01/02/2021	CF&HC
2. Review			
3. Review			
4. Review			
5. Review			
6. Review			
7. Review			
8. Review			
9. Review			
10. Review			
11. Review			
12. Review			



## Contents

1. INTRODUCTION.....	3
2. ABBREVIATIONS, DEFINITIONS AND TERMINOLOGY .....	3
3. TYPES OF DATA COLLECTED .....	4
4. LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR) .....	5
5. YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR) .....	7
6. SERVICE PROVIDERS .....	7

## 1. INTRODUCTION

Terra Analytics (Pty) Ltd (“us”, “we”, or “our”) operates the <http://www.terra.group> website (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <http://www.terra.group>

## 2. ABBREVIATIONS, DEFINITIONS AND TERMINOLOGY

<b>Service</b>	Service is the <a href="http://www.terra.group">http://www.terra.group</a> website operated by Terra Analytics (Pty) Ltd
<b>Personal Information / Data</b>	<p>Personal information is any information that can be used to reveal a person’s identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:</p> <ul style="list-style-type: none"> <li>▪ race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;</li> <li>▪ information relating to the education or the medical, financial, criminal or employment history of the person;</li> <li>▪ any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>▪ the biometric information of the person;</li> <li>▪ the personal opinions, views or preferences of the person;</li> <li>▪ correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>▪ the views or opinions of another individual about the person;</li> <li>▪ the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.</li> </ul>
<b>Data Subject or User</b>	This refers to the natural or juristic person to whom personal information relates, such as an individual client, customer or a company that supplies the organisation with products or other goods.
<b>Usage Data</b>	Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
<b>Cookies</b>	Cookies are small pieces of data stored on your device (computer or mobile device).

<b>Data Controller</b>	Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.
<b>Data Processors (or Service Providers)</b>	Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
<b>Information Collection and Use</b>	We collect several different types of information for various purposes to provide and improve our Service to you.
<b>NDA</b>	Confidentiality and Non-Disclosure Agreement

### 3. TYPES OF DATA COLLECTED

#### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Full name at birth
- Date of birth
- Personal Relationship status
- Cookies and Usage Data
- Gender

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

#### Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

#### Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

### **Use of Data**

Terra Analytics (Pty) Ltd uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

## **4. LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR)**

If you are from the European Economic Area (EEA), Terra Analytics (Pty) Ltd legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

### **Terra Analytics (Pty) Ltd may process your Personal Data because:**

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

### **Retention of Data**

- Terra Analytics (Pty) Ltd will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.
- Terra Analytics (Pty) Ltd will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods



## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside of South Africa and choose to provide information to us, please note that we transfer the data, including Personal Data, to South Africa and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Terra Analytics (Pty) Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data**

### **1. Business Transaction**

If Terra Analytics (Pty) Ltd is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **2. Disclosure for Law Enforcement**

Under certain circumstances, Terra Analytics (Pty) Ltd may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **3. Legal Requirements**

Terra Analytics (Pty) Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Terra Analytics (Pty) Ltd
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

### **4. Security of Data**

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### **5. “Do Not Track” Signals**

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## 5. YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Terra Analytics (Pty) Ltd aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us.

### **In certain circumstances, you have the following data protection rights:**

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Terra Analytics (Pty) Ltd relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

### **You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data.**

For more information, please contact your local data protection authority in the European Economic Area (EEA). In South Africa the Information Regulator is the Regulator in terms of Protection of Personal Information.

## 6. SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform service-related services or to assist us in analyzing how our Service is used.