

PROTECTION OF PERSONAL INFORMATION ACT – POLICY DOCUMENT

1. COLLECTION OF INFORMATION

1.1. As part of your interactions with K2019527378 (South Africa) (Pty) Ltd T/A Pinnacle Health and Wellness (“**Pinnacle Health and Wellness**”), Pinnacle Health and Wellness collects various data from you, both by you providing it directly, and automatically from, amongst other things, browsing our website. This Policy Document explains how Pinnacle Health and Wellness collects your data and what it can and cannot do with such information.

1.2. Personal information

1.2.1. Personal information includes:

1.2.1.1. certain information that Pinnacle Health and Wellness collects automatically when you visit our website;

1.2.1.2. certain information collected on registration (see below);

1.2.1.3. certain information collected on submission; and

1.2.1.4. optional information that you provide to Pinnacle Health and Wellness voluntarily (see below);

but excludes:

1.2.1.5. information that has been made anonymous so that it does not identify a specific person;

1.2.1.6. permanently de-identified information that does not relate or cannot be traced back to you specifically;

1.2.1.7. non-personal statistical information collected and compiled by Pinnacle Health and Wellness; and

1.2.1.8. information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and

does not constitute personal information subject to protection under this policy).

1.2.2. Sensitive personal information

Depending on the services required, Pinnacle Health and Wellness may also collect sensitive personal information including your:

- 1.2.2.1. financial information – such as your bank account details;
- 1.2.2.2. biometric information – such as images of your face or fingerprints; and
- 1.2.2.3. historical conduct – such as payment defaults and credit bureau listings.

1.3. From Browsers

Pinnacle Health and Wellness automatically receives and records internet usage information on its server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and Pinnacle Health and Wellness has no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

1.4. Cookies

1.4.1. Pinnacle Health and Wellness may place small text files called 'cookies' on your device when you visit its website. These files do not contain personal information, but they do contain a personal identifier allowing Pinnacle Health and Wellness to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- 1.4.1.1. granting you access to age restricted content;

- 1.4.1.2. tailoring our website's functionality to you personally by allowing your preferences to be remembered;
- 1.4.1.3. improving how our website performs;
- 1.4.1.4. allowing third parties to provide services to our website; and
- 1.4.1.5. helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

1.4.2. Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary.

1.5. Third Party Cookies

Some of Pinnacle Health and Wellness's business partners use their own cookies or widgets. Pinnacle Health and Wellness has no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by Pinnacle Health and Wellness.

1.6. Optional Details

You may also provide additional information to Pinnacle Health and Wellness on a voluntary basis (optional information). This includes content or products that you decide to upload or download from Pinnacle Health and Wellness's website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional services, or otherwise use the optional features and functionality of our website.

1.7. Purpose of Collection

1.7.1. Pinnacle Health and Wellness may use or process any services information, or optional information that you provide to it for the purposes that you indicated when you agreed to provide it to Pinnacle Health and Wellness. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. Pinnacle Health and Wellness

generally collects and processes your personal information for various purposes, including:

- 1.7.1.1. services purposes – such as requests for and providing our services;
 - 1.7.1.2. marketing purposes – such as pursuing lawful related marketing activities;
 - 1.7.1.3. business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, other proposed and actual transactions; and
 - 1.7.1.4. legal purposes – such as handling claims, complying with regulations, or pursuing good governance.
- 1.7.2. Pinnacle Health and Wellness may use your usage information for the purposes described above and to:
- 1.7.2.1. remember your information so that you will not have to re-enter it during your visit or the next time you access Pinnacle Health and Wellness's website;
 - 1.7.2.2. monitor website usage metrics such as total number of visitors and pages accessed; and
 - 1.7.2.3. track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.
- 1.8. Consent to Collection
- 1.8.1. Pinnacle Health and Wellness will obtain your consent to collect personal information:
 - 1.8.1.1. in accordance with applicable law;
 - 1.8.1.2. when you provide Pinnacle Health and Wellness with any registration information or optional information voluntarily.
 - 1.8.2. To the extent that you object to Pinnacle Health and Wellness processing your personal information, you can request that Pinnacle Health and

Wellness no longer process your personal information by completing Form 1 of the regulations relating to POPIA and submitting your form to Pinnacle Health and Wellness via email, alternatively by accessing your account online (if applicable), emailing Pinnacle Health and Wellness, or phoning Pinnacle Health and Wellness, notifying us of your objection.

2. **USE**

Pinnacle Health and Wellness may use your personal information to fulfil its obligations and to provide services to you.

3. **DISCLOSURE**

3.1. Sharing

Pinnacle Health and Wellness may share your personal information with:

- 3.1.1. other divisions or companies within the group of companies to which Pinnacle Health and Wellness belongs so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of its policies, and to guide decisions about its products, services, and communications (such divisions or companies will only use this information to send you marketing communications if you have requested their services);
- 3.1.2. an affiliate, in which case Pinnacle Health and Wellness will seek to require the affiliates to honour this privacy policy, and which affiliates will include entities which provide products and services relating the services which Pinnacle Health and Wellness provides;
- 3.1.3. Pinnacle Health and Wellness service providers under contract who help provide certain services or help with parts of Pinnacle Health and Wellness's business operations, including fraud prevention, bill collection, marketing, technology services (Pinnacle Health and Wellness's contracts dictate that these service providers only use your information in connection with the services they supply or services they perform for Pinnacle Health and Wellness and not for their own benefit);
- 3.1.4. credit bureaus to report account information, as permitted by law;

- 3.1.5. banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- 3.1.6. other third parties who provide Pinnacle Health and Wellness with relevant services where appropriate.

3.2. Regulators

Pinnacle Health and Wellness may disclose your personal information as required by law or governmental audit.

3.3. Law enforcement

Pinnacle Health and Wellness may disclose personal information if required:

- 3.3.1. by a subpoena or court order;
- 3.3.2. to comply with any law;
- 3.3.3. to protect the safety of any individual or the general public; and
- 3.3.4. to prevent violation of our customer relationship terms.

3.4. No selling

Pinnacle Health and Wellness will not sell personal information for purposes other than those related to the services which Pinnacle Health and Wellness provides. No personal information will be disclosed to any person, save for any third-party with whom Pinnacle Health and Wellness contracts for the purposes of providing products and/or services related to the services provided by Pinnacle Health and Wellness, as contemplated in this policy. Pinnacle Health and Wellness will only disclose personal information collected by Pinnacle Health and Wellness during the ordinary course of its business and any third-party will provide similar products and services in the ordinary course of its business, which products and services are closely related.

3.5. Marketing purposes

Pinnacle Health and Wellness may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

3.6. Employees

Pinnacle Health and Wellness will need to disclose personal information to its employees that require the personal information to do their jobs. These may include Pinnacle Health and Wellness's responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

3.7. Change of ownership

If Pinnacle Health and Wellness undergoes a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, Pinnacle Health and Wellness may assign its rights to the personal information it processes to a successor, purchaser, or separate entity. Pinnacle Health and Wellness will disclose the transfer on its website. If you are concerned about your personal information migrating to a new owner, you may request Pinnacle Health and Wellness to delete your personal information.

4. **SECURITY**

4.1. Protocols

Pinnacle Health and Wellness adheres to strict security protocols in respect of data protection laws. Our website is hosted in a secure server environment that uses a firewall in addition to other advanced security measures aimed to prevent any interference or access from unwarranted outside third parties.

4.2. Access

Access to any personal information is only authorised for employees who require such information in order to fulfil their employment responsibilities.

5. **ACCURACY OF INFORMATION**

5.1. Pinnacle Health and Wellness aims to ensure that all personal information collected is accurate, complete and up to date as is necessary for the purposes defined in this policy. In order to maintain accurate information, Pinnacle Health and Wellness may request that you update your information on our website.

5.2. Updating Information

You are able to review and update any personal information that may be held by Pinnacle Health and Wellness by accessing your account online (if applicable), emailing Pinnacle Health and Wellness, or phoning Pinnacle Health and Wellness, alternatively by completing Form 2 of the regulations relating to POPIA and submitting the completed form to Pinnacle Health and Wellness via email. The identity of any person wishing to update any information is required to be verified prior to the granting of any access to the respective person's account or making any changes to any personal information.

6. RETENTION OF INFORMATION

6.1. Period of Retention

Pinnacle Health and Wellness will retain personal information for as long as it deems it necessary to do so in order to perform services in the ordinary course of its business, and for as long as retention of the record is required or authorised by law.

6.2. Obligations

During the period of retention, Pinnacle Health and Wellness will continue to abide by all its obligations stipulated in this policy.

6.3. Pinnacle Health and Wellness reserves the right to retain information in physical or electronic records at its discretion.

7. TRANSFER OF INFORMATION

Pinnacle Health and Wellness undertakes not to transfer any personal information across any country border without prior written consent.

8. LIMITATION

8.1. Liability

Pinnacle Health and Wellness is not responsible for, gives no warranties and makes no representations whatsoever in respect of any privacy policy and/or practice belonging to linked or third-party websites.

9. ENQUIRIES

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.