

Thank you for visiting the make[sense]global Website ("Website"), owned and operated by make[sense] global ("make[sense]", "we," "us," "our," or other similar pronouns). We take the protection of your privacy and your personal information/data (Personal Information) seriously and therefore, created this Privacy Policy ("Privacy Policy") to inform you how we collect, use, share, and secure your Personal Information. By accessing or using the Website, you agree to this Policy and authorise us, our Associates, Service Providers, and other third-parties to process such Personal Information as set out herein as well as for the purposes stated in this Policy. We will not use your Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure or access. Please note that we may review and update this Policy from time to time. The latest version of this Policy is available on request.

This Policy applies to all external parties with whom we interact, including but not limited to individual clients, representatives of client organisations, visitors to our offices, and other users of our legal and related services. Defined terms used in this Policy are explained in "Annexure A".

All Personal Information collected through the Website will be treated as strictly confidential and will only be used as set out in this Privacy Policy. The applicable data protection laws will be adhered to. This Privacy Policy is incorporated into, and part of, the make[sense] [Website Terms and Conditions of Use](#), which governs your use of the Website in general.

Please read this Privacy Policy thoroughly. If you disagree with the way Personal Information will be used, please do not use the Website. If you have any questions about make[sense]'s collection of your data, please contact info@makesenseglobal.com

1. Purpose of data collection

1.1. The main purposes of collecting Personal Information through this Website is:

1.1.1. To provide the features and functionality of the Website to you;

1.1.2. To consider your candidacy for employment;

- 1.1.3. To identify you as the sender of, and to process, your emails;
 - 1.1.4. To respond to questions and comments;
 - 1.1.5. To improve, enhance, and tailor the Website for you, and to improve and enhance the overall Website experience for all Website users;
 - 1.1.6. To carry out specific actions you may request;
 - 1.1.7. For account validation purposes; and
 - 1.1.8. For analytics and trending purposes.
- 1.2. Additionally, individuals who voluntarily register on our mailing list, will receive our monthly email, Crib Sheet, along with information about upcoming events.

2. What Personal Information do we collect and process?

- 2.1. We collect information about you in various ways, namely: directly from you, from third-party sources, and through automated technologies. The types of Personal information that we collect from you depends on how you interact with Us.
- 2.2. Personal Information means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.
- 2.3. We collect the following Personal Information through the Website:
- 2.3.1. Information You Provide to Us:
 - 2.3.1.1. When you use our Website, or when you ask a question through the Website, you may provide us with information that identifies you or your contacts ("Personal Information"), such as:
 - 2.3.1.1.1. Your full name, address, email address, other information that may identify you as an individual;

- 2.3.1.1.2. Any personal information you submit to us in any forums, chats or blogs; and
- 2.3.1.1.3. The email addresses of your friends and family members, should you choose to send any of the content on our Website to your contacts through our “Email to a Friend” feature.

2.3.2. Information We Collect from You Automatically:

2.3.2.1. When you use the Website, we may also collect information about your use of the Website and the device used to access the Website that relates to you, but on its own does not identify you (“Non-Personal Information”) such as your:

- 2.3.2.1.1. **Personal Details:** name; and photograph(s);
- 2.3.2.1.2. **Demographic Information:** gender; date of birth/age; nationality; salutation; title; and language preferences;
- 2.3.2.1.3. **Identifier Information:** passport or national identity number; utility provider details; bank statements; tenancy agreements;
- 2.3.2.1.4. **Contact Details:** correspondence address; telephone number; email address; and details of your public social media profile(s);
- 2.3.2.1.5. **Instruction Details:** details of individuals instructing make[sense]; Personal Information included in correspondence, documents or other materials that we process in the course of providing our services;
- 2.3.2.1.6. **Attendance Records:** details of meetings and other events organised by or on behalf of make[sense] that you have attended;

2.3.2.1.7. **Consent Records:** records of any consent you may have given, together with the date and time, means of consent and any related information;

2.3.2.1.8. **Payment Details:** billing address; payment method; bank account number or credit card number; invoice records; payment records; SWIFT details; IBAN details; payment amount; payment date; and records of cheques;

2.3.2.1.9. **Data Relating to Your Visits to Our Website:** your device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Website; and any other technical communications information;

2.3.2.1.10. **Employer Details:** where you interact with us in your capacity as an employee of an organisation, the name, address, telephone number and email address of your employer, to the extent relevant; and

2.3.2.1.11. **Content and Advertising Data:** records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including, but not limited to, mouse hover, mouse clicks and any forms you complete).

2.4. Where we need to process your sensitive Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable law.

- 2.5. To the extent make[sense] associates your Personal Information with non-personal information within our database, we will treat all the associated information as Personal Information under this Privacy Policy.

3. What legal grounds do we rely on?

- 3.1. We will Process your Personal Information in the ordinary course of the business of providing our services. We will primarily use your Personal Information only for the purpose for which it was originally or primarily collected. We will use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. We may subject your Personal Information to processing during the course of various activities, including, without limitation, the following:

3.1.1. operating our business;

3.1.2. analysis, evaluation, review and collation of information in order to provide our services;

3.1.3. compliance with applicable law and fraud prevention;

3.1.4. transfer of information to our Service Providers and other third parties; and/or

3.1.5. recruitment.

- 3.2. We may process your Personal Information for relationship management and marketing purposes in relation to our services (including, but not limited to, processing that is necessary for the development and improvement of our services), for accounts management, and for marketing activities in order to establish, maintain and/or improve our relationship with you and our Service Providers. We may also analyse your Personal Information for statistical purposes.

- 3.3. We may process your Personal Information for internal management and management reporting purposes, including but not limited to conducting internal

audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis. We may process your Personal Information for safety and security purposes.

- 3.4. When we obtain Personal Information through a consent form, the legal ground is consent. Otherwise, we may rely on the legitimate interest within which the information is obtained and processed.

4. How do we share your Personal Information?

- 4.1. make[sense] may share your Personal Information in connection with:

- 4.1.1. **Operation of the Website:** We disclose your Personal Information to third parties where necessary to provide the Website and its features and functionality to you.
- 4.1.2. **Your requests:** We disclose your Personal Information to a third party whenever you request us to do so.
- 4.1.3. **Business transfers:** If a third party acquires all or substantially all of make[sense]'s assets, your Personal Information, and any other information that we have collected in connection with the Website may be transferred to such third party as part of our business assets. Also, if any bankruptcy or reorganisation proceeding is brought by or against us, all such information may be considered one of our assets and may be sold or transferred to third parties.
- 4.1.4. **Legal purposes and protection of make[sense] and others:** We reserve the right to share your Personal Information with third parties if required to do so by law, or if we believe such action is necessary in order to: (1) conform to the requirements of the law or comply with legal processes served upon us; (2) protect or defend our legal rights or property, the Website, or our users; or (3) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of the make[sense] Website Terms and Conditions of Use.

4.1.5. **Service providers:** We use third-party service providers, including but not limited to our affiliates, to perform certain services on our behalf, such as processing, storing, maintaining and transmitting data, processing and fulfilling email and other promotional campaigns, and providing marketing assistance, web analytics, and data analysis. We may provide your Personal Information to these third-party service providers when the information is necessary for them to perform their duties. These third-party service providers are contractually restricted from using your Personal Information for any other purpose and required to comply with all applicable laws with respect to the information they receive.

4.1.6. **Government agencies:** We will disclose your Personal Information to third parties if required to do so by law.

4.1.7. **As otherwise permitted by law:** We may disclose your Personal Information to third parties as otherwise permitted by applicable law. We may share your Non-Personal Information and your aggregated Personal Information with our existing or potential business partners, sponsors, and advertisers in order to describe the use of the Website by our users.

4.2. We may also group demographic information that we collect from the Website users into aggregate data for the same purposes. We reserve the right to use and share any such Non-Personal Information collected on the Website with third parties for any lawful purpose.

4.3. We will not disclose your Personal Information to anyone else under any circumstances, except as otherwise stated in this Privacy Policy, to successors in title to our business, to establish, exercise or defend our rights, or where required by law.

5. **A special note about minors**

5.1. The Website is intended for use only by persons who are at least 18 years of age and who are fully able and competent to enter into and be legally bound by this Privacy Policy. Accordingly, we do not intend to collect Personal Information from anyone whom we know to be under 13 years of age.

6. Viewing, editing, updating or deletion of your Personal Information

- 6.1. Please contact info@makesenseglobal.com if you want to see any Personal Information stored about you in our records. We will honour your legal right to view your Personal Information in accordance with applicable privacy law. If you think that any of the Personal Information collected through the Website is incorrect, confusing, or incomplete, please contact info@makesenseglobal.com.
- 6.2. You may also ask us to erase, restrict or port your Personal Information and you may tell us if you object to our use of your Personal Information.
- 6.3. Personal Information will be stored by us in accordance with our applicable data retention requirements and corporate policies.

7. Data security

- 7.1. We use a variety of methods, such as firewalls, intrusion detection software and manual security procedures, to secure your Personal Information against loss or damage and to help protect the accuracy and security of Personal Information and to prevent unauthorised access or improper use.
- 7.2. However, due to the inherent nature of the internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. We will have no liability for disclosure of your information due to errors or unauthorised acts of third parties during or after transmission.
- 7.3. If you think that the Website or any Personal Information is not secure or that there has been unauthorised access to the Website or your Personal Information, please contact info@makesenseglobal.com immediately.

8. Data transfers

- 8.1. Your Personal Information is transferred to the US, which is not considered to have the same level of data protection as in the EU. However, we ensure all data transfers

comply with applicable legal requirements (under intercompany agreements with appropriate contractual protections). Should you wish to know more about how data is protected or wish to request a copy of the contractual protections please contact info@makesenseglobal.com.

9. Data accuracy

- 9.1. The Personal Information provided to make[sense] should be accurate, complete, and up to date. Should Personal Information change, the onus is on the provider of such data to notify make[sense] of the change and provide make[sense] with the accurate data.

10. Data minimisation

- 10.1. make[sense] will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

11. Data retention

- 11.1. make[sense] shall only retain and store Personal Information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

12. Direct marketing

- 12.1. We may process your Personal Information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time. If you currently receive marketing information from us, which you would prefer not to receive in the future, please email us at info@makesenseglobal.com.

13. Cookies and other tracking technologies

- 13.1. Cookies:

13.1.1. A cookie is a small file which is placed on your computer's hard drive. If you choose to accept cookies (see below), the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us to provide you with a better Website, by enabling us to monitor which pages you find useful and which you do not.

13.2. Google Analytics " ga" and " gat G-GLGJE5FEE5":

13.2.1. Google Analytics uses cookies to measure user-interactions on websites. See: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

13.2.1.1. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Website.

13.3. Web beacon:

13.3.1.1. A Web beacon is an electronic image, also called a single-pixel or clear GIF, placed in the code of a webpage or in emails. The Website uses Web beacons to track traffic patterns of users as they navigate from one page to another. This information lets us tune and improve our users' browsing experience. We also use Web beacons through a third-party Website analytics provider, as well as standard Web server log files, to help us count visitors and evaluate the Website's technical capacity. This information tells us how many people visit the Website, and helps us decide how to arrange pages

in the most user-friendly way. This also helps us keep the Website browser-friendly and more useful to our users.

14. Do not track

- 14.1. make[sense] does not currently take actions to respond to Do not track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

15. Third-party Websites, content and resources

- 15.1. Please be aware that when you are using the Website, you could be directed via links or other means to third-party Websites, content, and resources that are not affiliated with the Website. These third-party Websites, content, and resources may send their own cookies to visitors, collect data, or solicit and use your personal information in ways different than set forth in this Privacy Policy. The privacy policies of these third-party Websites, content, and resources may be very different from this Privacy Policy. We are not responsible for the privacy practices of the providers of these other Websites, content, and resources and cannot guarantee the security of any of your personal information collected, used, or shared there.

16. Notification of changes

- 16.1. Should we wish to change this Privacy Policy, if you have already provided Personal Information through this Website we will contact you to inform you of the new Privacy Policy and, in some circumstances, we may need to obtain your consent to affect the changes. In other circumstances, any such changes to this Privacy Policy will be promptly communicated on this page, and you should check back to see whether there are any changes. Continued use of the Website after a change in the Privacy Policy indicates your acknowledgement and acceptance of the use of Personal Information in accordance with the amended Privacy Policy. If you wish to save this text, please mark the entire statement (e.g. with your mouse) and copy paste by pushing Ctrl+C.

17. Annexure A – Definitions

- 17.1. **"Associates"** means make[sense] shareholders, make[sense] subsidiaries and the directors, employees and consultants of make[sense] or of any of its subsidiaries.
- 17.2. **"Cookie"** means a small file that is placed on your device when you visit a website. In this Policy, a reference to a "Cookie" includes analogous technologies such as web beacons and clear Graphic Interchange Format files ("GIFs").
- 17.3. **"Operator"** means any person or entity that Processes Personal Information on behalf of the Responsible Party.
- 17.4. **"Personal Information"** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.
- 17.5. **"POPIA"** means the Protection of Personal Information Act 4 of 2013.
- 17.6. **"Process", "Processing" or "Processed"** means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- 17.7. **"Responsible Party"** means the entity that decides how and why Personal Information is processed.
- 17.8. **"Sensitive Personal Information"** means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- 17.9. **"Service Provider"** means third-party providers of various services whom we engage, including, but not limited to, providers of information technology,

communication, file storage, data storage, copying, printing, accounting or auditing services, counsel, experts, investigators, correspondent attorneys, translators, taxation consultants and our insurers and professional advisors.

17.10. **"Website"** means any website operated, or maintained, by us or on our behalf.