

Privacy Policy

Stem and its affiliates (collectively “Stem” “us” and “we”) understand the importance of protecting your personal data.

This Privacy Statement describes how Stem collects and uses your personal data, who we share it with, and your choices and rights in relation to your personal data.

It applies to personal data that we collect from you during your interactions with us, whether online, including through our websites (including mobile sites) and social media sites (“Sites”), mobile applications (“Apps”) (collectively “Online Services”) that link to this Privacy Statement, in writing or orally, or personal data that we may collect offline or receive from third parties.

Personal data we collect

Personal data is any information that identifies you as an individual or relates to you as an identifiable individual.

Depending on how you interact with us, personal data we collect may include:

- your name;
- email address;
- postal address;
- telephone number;
- log-in and account information for authentication purposes and account access;

- your gender; and
- social media account information.

We may also collect other information that does not personally identify you. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, primary language, and information collected through cookies and other technologies or information that has been anonymised or aggregated. If we link this information with your personal data, we will treat that linked information as personal data.

You can choose not to provide personal data to us when requested. However, if this is necessary to provide you with our solutions and services, access to our Online Services, or to perform administrative functions, we may be unable to do these things.

Sensitive personal data

We do not collect sensitive personal data about you, e.g. information relating to your health, religion, political beliefs, race or sexual orientation and ask that you do not send or provide this information to us.

How we collect your personal data

We may collect your personal data from you in a variety of ways when you interact with us, including:

[When you access our Online Services, or interact with us in any other way, or use our solutions and services:](#)

- You place orders for our solutions and services

- Create an account with us
- Your orders are processed and the associated payment transactions
- Perform administrative and business functions
- Market our solutions and services to you
- You register for our events, workshops and seminars
- You subscribe to our mailing lists and newsletters.

[When you communicate with us:](#)

- We respond to your inquiries and requests,
- Obtain feedback from you about our solutions and services or
- Applying for employment with us.
- From third party sources:
 - Social media sites
 - Business partners with whom we offer co-branded services or engage in joint marketing activities
 - Third parties that provide list enhancement or similar services

When you use our Online Services, we may, and third parties we engage may automatically collect data, including personal data through use of cookies and similar technologies. For more information, see the "Cookies and Similar Technologies" section below.

Legal basis for processing your personal data

When we process your personal data in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:

- Our legitimate interests (or those of a third party with whom we share your personal data) for the purpose of managing, operating or promoting our business, including direct marketing, and intra-Stem transfers of personal data for business and administrative purposes, except where such interests are overridden by your interests or fundamental rights or freedoms which require protection of personal data
- Where this is necessary to comply with a legal obligation on us
- To protect the vital interests of any individual
- Where you have consented

Use of your personal data

We may use your personal data to enable you to effectively use and to improve our solution and services. For example, to:

- Perform administrative and business functions and internal reporting
- Send administrative information to you
- Obtain feedback from you about our services and solutions including through client satisfaction surveys, in which event, we will only use your personal data for the sole purpose of sending you a survey (through our third party email delivery provider)
- Respond to your inquiries and fulfil requests by you
- Assess the performance of our Online Services and to improve their operation

- Inform you about and provide you with our services and solutions
- Update our records and keep contact details up to date
We engage in these activities to manage our contractual relationship with you, to comply with our legal obligations, or for our legitimate business interests.

Provide you with marketing materials and to personalise your experience. For example, to:

- send marketing communications to you.
- provide you with a more personalised experience when you interact with us.
- enable you to subscribe to our newsletters and mailing lists.
- enable you to register for Stem events, workshops and seminars.
We engage in these activities with your consent or for our legitimate business interests.

Achieve our business purposes and analyse information. For example, to:

- establish, manage, and maintain our business relationship with you.
- compile usage statistics for our Online Services.
- recruit staff.
- process and respond to privacy requests, questions, concerns and complaints.
- fulfil legal and contractual obligations.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation and for our legitimate business interests.

Security of your personal data

Stem is committed to protecting your personal data from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal data do the same.

Sharing your personal data

We may share your personal data for the purposes set out in this Privacy Statement (as applicable):

- With our affiliates and subsidiaries for the purposes set out in this Privacy Statement. Stem is the party responsible for the management of jointly used personal data
- With business partners with whom we offer co-branded services or engage in joint marketing activities
- With service providers to provide operational services or facilitate transactions on our behalf, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, client support, email delivery, data analytics and auditing
- Where you consent to the sharing of your personal data

- In connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company
- For other legal reasons:
 - We may share your personal data in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process
 - Where necessary to comply with judicial proceedings, court orders or government orders
 - To protect the rights, property or safety of Stem, its business partners, you, or others, or as otherwise required by applicable law.

Any third parties with whom we share personal data are contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

Links to third party websites and applications

Our Online Services may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third party websites and applications. Your use of such sites and applications is subject to the applicable third party privacy statement and is at your own risk.

Cookies and Similar Technologies

When you access our Online Services, we use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage (HTML 5). We use cookies to assist us with activities such as:

- Enabling you to sign in to our Online Services
 - Authenticating you
 - Keeping track of information you have provided to us
 - Improving your browsing experience
 - Customising our interactions with you
 - Storing and managing your preferences and settings
 - Compiling statistical data
 - Analysing the performance and usability of our Online Services
 - Measuring traffic patterns for our Online Services
 - Determining which areas of our Online Services have been visited
- These technologies collect information that your browser sends to our Online Services including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

Our Online Services may also contain web beacons or similar technologies from third party analytics providers, through which they collect information

about your activities across our Online Services to help us compile aggregated statistics.

Direct marketing

We may send you direct marketing communications about our solutions and services. You can choose whether you wish to receive marketing communications from Stem by email, SMS, post and phone. You may opt out of receiving marketing materials from us at any time and manage your communication preferences by:

- Following the unsubscribe instructions included in each marketing email or SMS text message from us
- Sending an email to privacyoffice@stem.co.za
- Including your details and a description of the marketing material you no longer wish to receive from us. We will comply with your request as soon as is reasonably practicable

If you opt out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our solutions and services, which you will be unable to opt out of.

We do not provide your personal data to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal data commercially available to any third party.

Retaining your personal data

We will retain your personal data for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or

enforce agreements. The criteria we use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain personal data, or as part of an investigation or for litigation purposes
- Personal data is needed to maintain accurate business and financial records
- There are automated means to enable you to access and delete your personal data at any time
- The personal data is sensitive personal data in which event we will generally retain this for a shorter period of time
- You have consented to us retaining your personal data for a longer retention period, in which case, we will retain personal data in line with your consent.

Updates to this Privacy Statement

We may update this Privacy Statement at any time. If we do, we will update the “last modified” section at the bottom of this Privacy Statement.

We encourage you to regularly review this Privacy Statement to stay informed about our privacy practices.

How to contact us

If you have any questions about how your personal data is handled by Stem, you have a privacy concern or you wish to make a request or a complaint relating to your personal data, please contact us.

You can reach us at privacyoffice@stem.co.za or at:

Stem

Attn: Privacy Officer

169 Corobay Avenue, 3rd Floor, Block B,

Corobay Corner,

Waterkloof Glen, Pretoria, South Africa 0181

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