

LEME MARKET PTY LTD
PRIVACY NOTICE

1. ABOUT US

- 1.1. This Privacy Notice sets out how your Personal Information will be used by Leme Market. It applies to Personal Information and Special Personal Information you give to us or which we may collect from third parties.
- 1.2. Leme Market is a private company registered according to the laws of the Republic of South Africa, with its registered address at 4 Club Crescent, Southdowns, Irene, Centurion, 0157.
- 1.3. Leme Market is a “**Responsible Party**” in respect of the Personal Information described in this Privacy Notice. This means that we are responsible for deciding how we hold and use Personal Information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.
- 1.4. It is important that you read this Privacy Notice carefully before submitting any Personal Information to Leme Market.

2. DEFINITIONS

- 2.1. For purposes of this Privacy Policy:
 - 2.1.1. “**Applicable Laws**” means all laws, regulations that Leme Market is required to comply with;
 - 2.1.2. “**Leme Market**”, “**us**”, “**we**” or “**our**” means Leme Market Pty Ltd, a company registered according to the laws of the Republic of South Africa, with registration number 2025/523562/07;
 - 2.1.3. “**Information Officer**” or “**IO**” means the Information Officer of Leme Market;
 - 2.1.4. “**Personal Information**” means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.1.5. “**Platform**” means any platform owned or controlled by Leme Market, including our website, our mobile application, e-commerce facilities and official accounts on social-media platforms such as Instagram, Facebook, TikTok, YouTube, X and LinkedIn;
 - 2.1.6. “**POPIA**” means the *Protection of Personal Information, 2013* and any regulations or codes of conduct promulgated thereunder;

- 2.1.7. “**Process**” means any activity that involves the use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
- 2.1.7.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.1.7.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 2.1.7.3. merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 2.1.8. “**Special Personal Information**” means Personal Information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence. It also covers information about a Data Subject’s criminal behavior if it relates to alleged crimes they might have committed, or any legal proceedings related to those alleged crimes; and
- 2.1.9. “**you**” or “**your**” refers to any third party of Leme Market, for example users of our Platforms, suppliers, contracting parties, business partners, website users, etc, whose Personal Information we Process.

3. **SCOPE AND APPLICATION**

- 3.1. This Privacy Notice applies to you if you are a:
- 3.1.1. user of Leme Market’s Platforms;
 - 3.1.2. business entities that subscribe to, commission or receive research, insight reports, newsletters or other business-to-business communications from Leme Market;
 - 3.1.3. directors, officers, employees, interns, consultants and volunteers who render services to or on behalf of Leme Market; and
 - 3.1.4. potential, current or former customers of ours (including representatives), which includes buyers and sellers on Leme Platforms, and/or

- 3.1.5. any other Data Subject whose Personal Information is Processed by or on behalf of Leme Market.
- 3.2. By providing us with your Personal Information, you acknowledge that Leme Market may rely on any of the reasons mentioned above when Processing your Personal Information as set out in this Privacy Notice, unless your explicit consent is required by Applicable Law (for example, for direct marketing communications).
- 3.3. The provisions of this Privacy Notice are subject to Applicable Laws.
- 3.4. Please do not provide us with any Personal Information if you do not agree with any of the provisions of this Privacy Notice. If you do not agree with any part of this Privacy Notice, we may not be able to provide our products and services to you.
- 3.5. You have the right to withdraw your consent for a specific Processing activity at any time. To withdraw your consent, please contact our IO. Once we have received notification that you have withdrawn your consent, we will no longer Process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 3.6. In most circumstances, providing your Personal Information to us is voluntary. Sometimes, it may be compulsory to provide your Personal Information to us. If you fail to provide certain Personal Information when requested, we may not be able to perform the services you requested from us or we may be prevented from complying with our legal obligations.

4. **HOW TO CONTACT US**

If you have any comments or questions about this Privacy Notice or how we handle your Personal Information, please contact the Information Officer.

IO Name: Carlyn Davies

E-mail address: info@lememarket.com

5. **CHANGES TO THIS PRIVACY NOTICE**

- 5.1. We may change this Privacy Policy from time to time for any of the following reasons:
 - 5.1.1. to provide for the introduction of new systems, methods of operation, services, products or facilities;
 - 5.1.2. to provide for any changes to our Processing activities;
 - 5.1.3. to provide for any changes to our entity's or IO's details;

- 5.1.4. to comply with developments in, or changes to, Applicable Laws or guidance notes or requirements issued by the Information Regulator of South Africa from time to time; or
 - 5.1.5. for any other reason which we, in our sole discretion, may find reasonable or necessary.
- 5.2. Any such change will automatically come into effect and become part of any agreement you have with Leme Market. We may notify you of any material changes that we make by publication on our Platforms, however please ensure that you regularly check our Platforms.

6. **INFORMATION WHICH WE MAY COLLECT ABOUT YOU**

- 6.1. Depending on the nature of our relationship with you, we may collect and Process one or more of the following categories of your Personal Information:
- 6.1.1. identification particulars (including names, identity or passport numbers, company registration numbers and tax reference numbers);
 - 6.1.2. contact details (such as postal and physical addresses, contact numbers, e-mail addresses and social-media handles);
 - 6.1.3. demographic attributes (for example age, gender, nationality and language preference);
 - 6.1.4. employment, professional and educational details (job title, employer, qualifications, curriculum vitae information and references);
 - 6.1.5. transactional data (purchase histories, invoices and payment confirmations);
 - 6.1.6. browsing behaviour, search queries, product interactions, livestream engagement, and seller performance metrics;
 - 6.1.7. imagery, audio-visual content and biometric material (photographs, video footage and, where expressly required, facial recognition data for secure access at events);
 - 6.1.8. device and technical information (IP address, browser type, operating system, cookies, pixel tags and log data);
 - 6.1.9. user-generated content (comments, survey responses, competition entries, posts and messages sent to us on social-media platforms);

- 6.1.10. preferences and marketing indicators (records of consents, areas of professional or creative interest and communication settings); and
 - 6.1.11. where legally permissible, special-category information (referred to as “**Special Personal Information**”) such as dietary or accessibility requirements disclosed for the purpose of attending an event.
- 6.2. Leme Market does not collect or store credit card information, or other forms of payment information, on our Platform. Payment Card Industry compliance is managed by our payment processors, not Leme Market.
- 6.3. Where you provide us with the Personal Information of third parties:
- 6.3.1. you should take steps to inform the third party that you need to disclose their details to us, identifying us; and
 - 6.3.2. you warrant that you are authorised to provide us with such Personal Information and that you have complied with Applicable Law (for example, obtaining consents, directing them to our Privacy Policy, etc.) in doing so.

7. HOW WE COLLECT INFORMATION

- 7.1. **Directly** – Leme Market obtains Personal Information directly from you if you sign-up on our website and/or application, join livestream recordings, chat on our Platforms, viewer analytics, moderation events, interact with our social-media channels, contact us by phone or e-mail, or otherwise volunteer information to us in the course of engagement. We also collect information automatically through the use of cookies and similar tracking technologies when our Platforms are visited.
- 7.2. **Indirectly** – In addition, we may lawfully receive personal information from third-party sources such as educational institutions, industry associations, payment service providers, delivery and logistics partners, publicly available registers, credit-rating agencies, social-media networks (subject to the privacy settings chosen by each user) and referees supplied in support of job or grant applications.
- 7.3. **Public sources** — Personal Information may be obtained from public registers (such as Companies and Intellectual Property Commission), news articles, sanctions lists, and Internet searches and other similar public platforms.
- 7.4. **Social and professional networking sites** — If you register or login to our websites using social media (e.g., LinkedIn, Google, or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That

information may include your name and email address and depending on your privacy settings, additional details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.

8. **USE OF INFORMATION COLLECTED**

8.1. Leme Market may Process Personal Information for the following purposes:

- 8.1.1. To provide products and services to you, including analytics regarding your products and sales.
- 8.1.2. To meet legal and regulatory requirements.
- 8.1.3. To manage and respond to any request you submit through our website, application or social media channels.
- 8.1.4. To confirm and verify your identity or to verify that you are an authorised user for security purposes.
- 8.1.5. To ensure delivery of products and services ordered on the Platform, your Personal Information will be shared with sellers and other necessary service providers such as couriers.
- 8.1.6. Administering, maintaining and ensuring the security of our information systems, applications and websites.
- 8.1.7. To moderate and administer the livestream events and other necessary moderation, to ensure no spam, bullying or other conduct that is against our community guidelines.
- 8.1.8. To conduct market or customer satisfaction research or for statistical analysis.
- 8.1.9. In connection with legal proceedings.
- 8.1.10. Operating, improving, securing and auditing our digital platforms;
- 8.1.11. Personalising content, recommendations and advertising, subject to data subjects' marketing preferences; complying with obligations imposed by applicable statutes, regulations, court orders or regulatory directives; and
- 8.1.12. detecting, preventing and responding to fraud, money-laundering, infringement of intellectual property and other unlawful activities; and pursuing or defending legal claims.

- 8.2. Each processing activity is undertaken on one or more lawful bases recognised under POPIA and, where relevant, under comparable data-protection regimes in other African jurisdictions, including:
- 8.2.1. the necessity of the processing for the performance of a contract or to take steps at the data subject's request prior to entering a contract;
 - 8.2.2. Leme Market's legitimate interests or those of a third party, balanced against the data subject's rights and expectations;
 - 8.2.3. compliance with our legal or regulatory duties;
 - 8.2.4. the protection of a legitimate interest of the data subject; or
 - 8.2.5. where none of the foregoing bases applies, the data subject's informed, voluntary and revocable consent.
 - 8.2.6. Please note: Consent is the only ground we can rely on if you are a child and we are Processing your information (e.g. if you attend workshops, masterclasses and educational programmes delivered by or in partnership with Leme Market). If this is applicable, we will need the consent of your parent or legal guardian to Process your information.
- 8.3. We may from time to time contact you about services, products and offerings available from Leme Market which we believe may be of interest to you, by email, phone, text or other electronic means, provided we have received your consent to do so. You can unsubscribe from receiving such communications by contacting the IO, or following the prompt in any communications we send you.

9. **DISCLOSURE OF YOUR INFORMATION**

- 9.1. Leme Market does not sell your Personal Information.
- 9.2. We may, however, share Personal Information where one or more of the lawful bases described above is present, and strictly to the extent necessary for the purpose concerned.
- 9.3. Recipients may include:
- 9.3.1. payment processors and financial institutions facilitating transactions;
 - 9.3.2. sellers who provide products and/or services through our Platform;
 - 9.3.3. couriers, freight forwarders and event venues responsible for delivery and access control;

- 9.3.4. accredited educational partners and guest lecturers collaborating on learning initiatives;
 - 9.3.5. cloud-hosting providers, IT-security vendors, analytics specialists and other service providers who support our technological infrastructure under binding confidentiality obligations;
 - 9.3.6. marketing agencies, media partners and social-media platforms to the extent required to execute targeted campaigns compliant with applicable laws;
 - 9.3.7. professional advisers such as auditors, insurers and legal counsel;
 - 9.3.8. regulatory authorities, courts and law-enforcement bodies where disclosure is mandated or prudent to protect Leme Market's rights or those of Data Subjects; and
 - 9.3.9. prospective or actual successors in title in connection with a merger, acquisition, corporate restructuring or transfer of Leme Market's activities, provided that any such successor will be bound by privacy safeguards no less protective than those set out in this Privacy Notice.
- 9.4. We are based in and operate from South Africa. A third party recipient could carry on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the similar level of protection as if we were dealing with it. Also, your Personal Information will only be transferred to and stored in country where the service provider is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.

10. **RETENTION OF YOUR INFORMATION**

We will retain your Personal Information for as long as it is necessary to achieve the purpose for which it was collected, and in some cases this may be for an indefinite period, if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your Personal Information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose (for example, for the purposes of complaints handling, legal processes and proceedings).

11. **YOUR RIGHTS**

- 11.1. You have the right to withdraw your consent for certain specific Processing activities at any time. To withdraw your consent, please contact the IO. Once we have received notification that you have withdrawn your consent, we will no longer Process your Personal Information

for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

- 11.2. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.
- 11.3. You may request details of Personal Information which we hold about you under Applicable Law.
- 11.4. You may request the correction of Personal Information Leme Market holds about you. Please ensure that the information we hold about you is complete, accurate and up to date.
- 11.5. You have a right to object on reasonable grounds to the Processing of your Personal Information where the Processing is carried out in order to protect our or a third party's legitimate interests or your legitimate interests, unless the law provides for such Processing.

If you wish to exercise any of these rights, please contact us using the contact details set out above in paragraph 4.

12. **DELETION OF AN ACCOUNT**

- 12.1. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the Processing of Personal Information held about you.
- 12.2. You can delete your account via the application settings in our Platform, failing which, by contacting the Information Officer noted in section 4 above.
- 12.3. Certain data may be retained where required by law, including transaction records for financial reporting and fraud prevention.

13. **OUR COMMITMENT TO SECURITY**

The security of your data is important to us. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorised access or disclosure of your information. We will do our best to protect your Personal Information and we will use up to date technology that will help us to do this. We will at all times comply with our obligation under Applicable Law. It is important that you take all necessary and appropriate steps to protect your Personal Information yourself (for example, by ensuring that all passwords and access codes are kept secure).

14. **TRANSFER OF DATA**

- 14.1. We are based in and operate from South Africa.
- 14.2. We may transfer your Personal Information outside of the country where you provided it, but only if such transfers are permitted in terms of privacy laws.
- 14.3. We may also transfer certain Personal Information outside of the country where you provided it, to third parties working with us or on our behalf for the purposes described in this Privacy Notice. When transferring Personal Information internationally to third parties we will ensure your Personal Information will continue to be protected for example, by entering into binding data transfer agreements or by ensuring there are adequate data privacy laws, which requires the relevant third party to adhere to the data handling and data protection requirements, acceptable to Leme Market.

15. **LINKS TO OTHER WEBSITES AND COOKIES**

- 15.1. Our Platforms may contain links to and from websites, mobile applications or services of third parties, social media platforms, payment gateways, appointment scheduling and/or live chat platforms, advertisers or affiliates ("**Third Party Website**"). Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects Personal Information. If you select a link to any Third Party Website, you may be subject to such Third Party Website's terms and conditions and/or other policies, which are not under our control, nor are we responsible therefore.
- 15.2. Hyperlinks to Third Party Websites are provided "as is", and we do not necessarily agree with, edit or sponsor the content on Third Party Websites.
- 15.3. We do not monitor or review the content of any Third Party Website. Opinions expressed or material appearing on such websites are not necessarily shared or endorsed by us and we should not be regarded as the publisher of such opinions or material. Please be aware that we are not responsible for the privacy practices, or content, of other websites, either.
- 15.4. Users should evaluate the security and trustworthiness of any Third Party Website before disclosing any Personal Information to them. We do not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of Personal Information.
- 15.5. Our Platforms may use cookies. If cookies are used, your browser will receive a warning explaining how they are used.

16. COMPLAINTS

16.1. Should you believe that Leme Market has utilised your Personal Information contrary to Applicable Laws, we would appreciate if you could first attempt to resolve any concerns with us.

16.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the applicable data protection authority.

16.2.1. In South Africa, the details of the Information Regulator are listed below:

E-mail address POPIAComplaints@inforegulator.org.za

Physical address JD House
27 Siemens Street
Braamfontein
Johannesburg, 2001

17. LATEST VERSION

17.1. Leme Market keeps this Privacy Notice under regular review and may update or make material changes this Privacy Notice from time to time.

17.2. It is your responsibility to regularly check our Privacy Notice for any updates or changes. Continued use of our services after any changes to this Privacy Notice will constitute your acknowledgment of the modifications and your agreement to abide by the updated terms.

17.3. In the event of any material changes to this Privacy Notice, we will notify you of the update on our website.