


PRIVACY POLICY

APPROVED BY:



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ENDORSED BY:



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CHIEF EXECUTIVE OFFICER

PRIVACY POLICY

1. Definitions

“Personal Information” means information defined from time to time as personal information in any Data Protection Laws, including information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including:

- 1.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- 1.2 information relating to the education or the medical, financial, criminal or employment history of the person;
- 1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 1.4 the biometric information of the person;
- 1.5 the personal opinions, views or preferences of the person;
- 1.6 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;
- 1.7 the views or opinions of another individual about the person; and
- 1.8 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.

2. Introduction

Privacy, especially around Personal Information is important to Novus Holdings. This Privacy Policy, applicable to all Novus Holdings stakeholders, including, but not limited to subsidiaries, customers, prospective customers, employees, prospective employees, suppliers, contractors, agents and representatives (hereinafter referred to as “the policy”) sets out the practices applicable to the protection of Personal Information on all Novus Holdings websites and platforms. The policy applies to all our products and services which are used on any platform, including but not limited to websites, mobile sites, social media platforms, e-mails or any other technology or service that are used to access any Novus Holdings product or service.

This policy must also be read in conjunction with privacy provisions as it relates to contracts, terms and conditions, notices, and requests when Personal Information is collected. This policy does not rescind, cancel or withdraw any privacy notice and/or policies that may apply.

3. Use of information

Novus Holdings is committed to keeping Personal Information confidential. Novus Holdings collects Personal Information that is necessary to provide services and products as advertised or marketed and will only collect and use the minimum Personal Information that is needed in order to provide and improve our services and products.

Personal Information that can be collected and processed may include: names; e-mail and/or physical addresses; mobile numbers and race/ethnic origin, gender, age, financial information, banking details, health or biometric information, culture, language, education or employment history (only when express consent is obtained).

4. **Personal information**

A Novus Holdings platform can be visited without revealing any Personal Information, however, Novus Holdings may request Personal Information. This information may be requested in order to facilitate communication or to process an order.

When requested to provide Personal Information, Novus Holdings will communicate how it will use the Personal Information before the information is collected. Should a person wish that his/her Personal Information not be used as a basis for further communication or for any other purpose, Novus Holdings will respect this and will not use the information for any further purpose.

What Novus Holdings does with Personal Information collected:

- 4.1 Identification, verifying identity and create a user account (if applicable).
- 4.2 Provide interested parties with information, marketing material, products and/or services upon request from Novus Holdings.
- 4.3 Comply with any contractual obligations Novus Holdings has in respect of the provision of any information, services and/or products.
- 4.4 Communicate with interested parties with regards to sharing information, billing, customer support, quality control and resolving complaints.
- 4.5 Obtain customer feedback to improve our products and/or services.
- 4.6 Comply with applicable legislation.

Novus Holdings will not use any Personal Information for any other purpose without consent and will only keep Personal Information for as long as it is needed to provide our platforms, products and/or services to interested parties. This will be governed by law or (if applicable) the contract between stakeholders and Novus Holdings, or where consent has been provided that Personal Information be kept.

Novus Holdings will not willfully sell, rent or trade any Personal Information to third parties for their marketing or any other purposes. Personal Information will only be shared/provided to third parties in the event that explicit consent has been provided to share Personal Information with third parties, where stakeholders have expressed interest in a product and/or service. When sharing Personal Information with third parties (after obtaining explicit consent), Novus Holdings will require these third parties to honour this Policy to the full extent required by applicable legislation.

Mandatory disclosure:

Personal Information may be disclosed to third parties if required for legal purposes, such as:

- a) Law enforcement by a court order; or
- b) To regulators as law or governmental audit requires; or
- c) Other third parties as applicable legislation requires.

5. **Information security and quality**

Novus Holdings intends to protect the quality and integrity of Personal Information and has implemented suitable technical and organisational information security measures to ensure that Personal Information is kept secure, safe, accurate and complete. However, Novus Holdings cannot guarantee the security of any information which have been submitted on any Novus Holdings platform and all stakeholders are hereby notified that Personal Information is/will be submitted at their own risk.

Novus Holdings regularly check that the safeguards in place are correctly implemented and continually updated in response to new risks or any identified deficiencies.

All commercially reasonable efforts will be made to accommodate and respond to requests to rectify any incorrect Personal Information in a timeous manner.

6. **Customer/supplier rights**

6.1 Customers and/or Suppliers have the right to request access to the Personal Information Novus Holdings has collected about them and request that the information be corrected and/or update any incorrect or incomplete information

6.2 Customers and/or Suppliers have the right to ask not to be contacted for marketing purposes.

7. **Changes to this Privacy Policy**

Novus Holdings may occasionally update this Privacy Policy. Any changes made will be posted on our communication platforms. The Privacy Policy posted on any Novus Holdings platform, will be applicable to all visitors to such platform. We encourage all stakeholders to review the Privacy Policy whenever any Novus Holdings platform is accessed.