POPIA Compliance Notice

Protection of Personal Information Act 4 of 2013 | 13 May 2026

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This notice is issued by Trade Grid (Pty) Ltd in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA"), which came into full effect in the Republic of South Africa on 1 July 2021.

POPIA regulates the processing of personal information by public and private bodies and grants individuals the right to privacy and protection of their personal information.

Trade Grid is committed to full POPIA compliance and has appointed a designated Information Officer registered with the Information Regulator of South Africa.

Document	POPIA Compliance Notice
Version	1.0
Effective Date	13 May 2026
Issued By	Trade Grid (Pty) Ltd
Address	1437 Market Street, Johannesburg, South Africa 2094
Contact	legal@tradegrid.com	+27 (83) 720-4520

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1 Responsible Party Details

In terms of Section 55 of POPIA, we confirm the following responsible party details:

RESPONSIBLE PARTY

Responsible Party: Trade Grid (Pty) Ltd

Registration Number: [Company Registration Number]

Physical Address: 1437 Market Street, Johannesburg, Gauteng, South Africa 2094

Designated Information Officer: [Full Name of Information Officer]

Information Officer Email: informationofficer@tradegrid.com

Information Officer Phone: +27 (83) 720-4520

The Information Officer has been duly registered with the Information Regulator of South Africa in terms of Section 55 of POPIA and is responsible for ensuring compliance with POPIA throughout the organisation.

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2 Condition 1 — Accountability

Trade Grid, as the responsible party, accepts full accountability for ensuring that all eight conditions for lawful processing set out in Chapter 3 of POPIA are complied with at all times when processing personal information.

We have implemented a comprehensive POPIA compliance programme that includes:

- Appointment and registration of a designated Information Officer.
- Development and maintenance of a POPIA Privacy Manual and processing register.
- Staff training and awareness programmes on responsible data handling.
- Regular compliance audits and gap assessments.
- Documented policies and procedures for all personal information processing activities.

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3 Condition 2 — Processing Limitation

Trade Grid collects and processes personal information only for specific, explicitly defined, and lawful purposes directly related to the provision of the Trade Grid platform and associated services.

We do not process personal information in a manner incompatible with the purposes for which it was originally collected. Specifically, we collect personal information:

- Only with the knowledge and, where required, the consent of the data subject.
- Only to the minimum extent necessary for the stated purposes (data minimisation principle).
- Never for the purpose of selling, renting, or trading personal information to third parties for commercial gain.

All processing activities are documented in our internal Processing Register, which is maintained and reviewed by our Information Officer on a quarterly basis.

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4 Condition 3 — Purpose Specification

Personal information is collected directly from data subjects wherever reasonably practicable. The purposes for collection are clearly stated at the point of collection. Our primary purposes for collecting personal information include:

- Business registration, identity verification, and account management on the Trade Grid Platform.
- AI-powered trade matching, Business Profile creation, and display to other verified Users.
- Communication regarding platform services, verification status, and trade opportunities.
- Legal and regulatory compliance including FICA obligations, SARS reporting, and sanctions screening.
- Platform security, fraud detection, and prevention of money laundering and financial crime.
- Aggregated, anonymised analytics to improve platform quality and user experience.

Personal information will not be retained for longer than is necessary to fulfil the stated purpose or as required by law. Our retention schedule is documented and enforced through automated data lifecycle management processes.

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5 Condition 4 — Further Processing Limitation

Personal information collected by Trade Grid will not be processed for a secondary purpose that is incompatible with the original purpose of collection.

Further processing of personal information is permitted only where:

- The data subject has provided explicit written consent to the further processing.
- The further processing is required or permitted by applicable law or regulation.
- The further processing is compatible with the original purpose and does not prejudice the legitimate interests of the data subject.
- The information has been de-identified to a standard that prevents re-identification.

Any proposed further processing activity that is not clearly covered by the original consent or legal basis must be reviewed and approved by the Information Officer before implementation.

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6 Condition 5 — Information Quality

Trade Grid takes reasonable steps to ensure that all personal information we collect and process is:

- Complete and not missing material fields required for the stated processing purpose.
- Accurate and not containing material errors at the time of collection.
- Not misleading — we verify key business information against third-party registries where possible.
- Updated where necessary — Users are required and encouraged to maintain the accuracy of their Business Profiles.

Users are responsible for notifying Trade Grid promptly of any changes to their personal or business information. Inaccurate information may result in suspended verification status or account restrictions. Users may update their information at any time through the account settings page or by contacting support.

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7 Condition 6 — Openness

Trade Grid maintains full transparency about our personal information processing activities through the following measures:

- This POPIA Compliance Notice, publicly available on our website and linked from our signup form.
- Our Privacy Policy, which provides detailed information about data collection, use, retention, and User rights.
- Our Terms of Service, which governs the legal relationship between Trade Grid and its Users.
- Our PAIA Manual, available on request from our Information Officer, describing all categories of records held by Trade Grid.
- In-platform notifications and consent mechanisms at all points where personal information is collected.

Our Privacy Manual is available to any data subject or interested party on written request to informationofficer@tradegrid.com. A reasonable processing fee may apply in accordance with applicable regulations.

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8 Condition 7 — Security Safeguards

Trade Grid has implemented appropriate, reasonable technical and organisational measures to safeguard the integrity and confidentiality of all personal information in our possession or under our control.

Our security measures include:

- AES-256 encryption for all personal information and documents stored at rest in our systems.
- TLS 1.3 protocol for all personal information transmitted between users and our platform.
- Role-based access controls (RBAC) ensuring staff access only the information necessary for their specific role.
- Multi-factor authentication (MFA) for all administrators and operators with access to personal information.
- Annual independent penetration testing and quarterly internal vulnerability assessments.
- ISO 27001-aligned information security policies covering all aspects of personal information handling.
- A documented, tested incident response plan with defined response timelines and escalation procedures.

In the event of a security breach that is likely to cause harm to a data subject, Trade Grid will notify both the Information Regulator of South Africa and affected data subjects within 72 hours of becoming aware of the breach, in accordance with Section 22 of POPIA.

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9 Condition 8 — Data Subject Participation

Trade Grid fully recognises and upholds the rights of data subjects under POPIA. Data subjects have the right to:

- **Access (Section 23):** Request confirmation that Trade Grid holds their personal information and receive a copy thereof.
- **Correction (Section 24):** Request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained.
- **Objection (Section 11(3)):** Object at any time to the processing of personal information for purposes of direct marketing.
- **Complaint (Section 74):** Lodge a complaint with the Information Regulator of South Africa where the data subject believes their rights under POPIA have been infringed.

To exercise any of the above rights, data subjects may contact our Information Officer at informationofficer@tradegrid.com. All requests will be acknowledged within 3 business days and fully responded to within 30 days (extendable by a further 30 days for complex requests with notification).

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10 Special Personal Information

POPIA provides heightened protection for certain categories of "special personal information" under Section 26. Trade Grid does not intentionally collect, process, or store the following categories of special personal information unless strictly necessary and with explicit written consent:

- Religious or philosophical beliefs.
- Race or ethnic origin.
- Trade union membership.
- Political persuasion or affiliation.
- Health, medical, or sex life information.
- Biometric data (fingerprints, facial recognition, voice prints, etc.).
- Criminal behaviour, alleged offences, or criminal proceedings.

Where identity documents (such as South African IDs or passports) are collected for verification purposes, Trade Grid processes only the minimum information necessary for identity confirmation. No biometric data is extracted, processed, or stored from any submitted document.

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11 Cross-Border Data Transfers (Section 72)

Section 72 of POPIA restricts the transfer of personal information to recipients in foreign countries. Trade Grid may transfer personal information across borders only where one of the following conditions is met:

- The recipient country has been declared by the Information Regulator as having adequate data protection legislation.
- The recipient organisation is bound by a binding corporate rule or contractual data processing agreement upholding standards equivalent to POPIA.
- The data subject has explicitly consented to the proposed transfer with full knowledge of the recipient country and its privacy framework.
- The transfer is necessary for the performance of a contract to which the data subject is a party or to take pre-contractual steps at the data subject's request.

We maintain a register of all cross-border data flows and ensure that all international service providers sign our standard Data Processing Agreement (DPA) before any transfer of personal information occurs.

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12 PAIA Manual & Access to Records

In terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), Trade Grid has compiled a PAIA Manual describing:

- The categories of records held by Trade Grid and the purposes for which they are held.
- The procedures and forms for submitting a formal access request.
- The fees applicable to processing access requests.
- The grounds upon which a request for access may be refused.

To request a copy of our PAIA Manual or to submit a formal PAIA access request:

- Email informationofficer@tradegrid.com with subject line: "PAIA Manual Request" or "PAIA Access Request".
- The prescribed PAIA Form C must accompany all formal access requests.
- A processing fee may be charged in accordance with the PAIA Regulations (GN 187 of 2002).
- We will respond to all access requests within 30 days as required by Section 25 of PAIA.

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13 Updates & Information Officer Contact

This POPIA Compliance Notice will be reviewed at least annually and updated as required by changes in legislation, regulatory guidance, Information Regulator decisions, or our processing activities.

The effective date displayed on this document reflects the date of the most recent revision. Material updates will be communicated to all registered Users via email notification.

INFORMATION OFFICER CONTACT

Designated Information Officer, Trade Grid (Pty) Ltd

1437 Market Street, Johannesburg, Gauteng, South Africa 2094

Email: informationofficer@tradegrid.com

Phone: +27 (83) 720-4520 | Hours: Monday–Friday, 9:00 AM – 6:00 PM SAST

INFORMATION REGULATOR OF SOUTH AFRICA

JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001

Website: www.inforeg.org.za

Email: inforeg@justice.gov.za | complaints.IR@justice.gov.za

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