Privacy Policy

Version 1.0 | Effective 13 May 2026

Privacy Policy

Trade Grid (Pty) Ltd — Data Protection Statement

Trade Grid is committed to protecting the privacy and personal information of all Users. This Privacy Policy explains what personal and business data we collect, why we collect it, how we use and protect it, and what rights you have over your information.

This policy applies to all individuals and businesses who interact with the Trade Grid platform, including visitors, registered Users, and prospective partners.

This Privacy Policy must be read together with our Terms of Service and our POPIA Compliance Notice.

Document	Privacy Policy
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 Who We Are (Responsible Party)

The responsible party for the purposes of the Protection of Personal Information Act 4 of 2013 (POPIA) and, where applicable, the General Data Protection Regulation (GDPR) is:

RESPONSIBLE PARTY

Trade Grid (Pty) Ltd

Registration No: [Company Registration Number]

1437 Market Street, Johannesburg, Gauteng, South Africa 2094

Information Officer: [Full Name]

Email: privacy@tradegrid.com | Phone: +27 (83) 720-4520

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2 Information We Collect

2.1 Identity & Business Information

- Full name, job title, and national ID or passport number of the account holder and directors.
- Business name, trading name, company registration number, CIPC number, VAT number, and SARS tax reference number.
- Business entity type, industry sector, year of establishment, employee headcount, and annual turnover range.

2.2 Contact Information

- Business email address, mobile number, business landline, and website URL.
- Registered business address including street, suburb, city, region/province/state, and country.
- LinkedIn company page URL and other professional social media profiles where provided.

2.3 Verification Documents

- CIPC Certificate of Incorporation, SARS Tax Clearance Certificate, Director ID/Passport copies.
- Bank Confirmation Letter, Import/Export Licences, and B-BBEE Certificates where provided.

2.4 Platform Usage Data

- IP address, browser type and version, device identifiers, operating system, and referral URL.
- Pages visited, time spent on the Platform, search queries, match interactions, and feature usage patterns.
- Messaging metadata (we do not read or store the content of private messages).

2.5 Financial Information

- Annual turnover range (for matching purposes) and subscription payment records.
- Credit/debit card details are processed by our PCI-DSS compliant payment provider and are never stored by Trade Grid.

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3 How We Use Your Information

We use your personal and business information only for the following lawful purposes:

- **Account creation & verification:** To register your business, verify your identity and documentation, and display a verified Business Profile.
- **Service delivery:** To generate AI-powered trade matches, surface relevant market insights, and facilitate business connections between Users.
- **Communication:** To send transactional emails (account confirmations, verification updates, match notifications) and, where opted in, marketing communications.
- **Legal compliance:** To meet our obligations under POPIA, FICA, the Companies Act, SARS requirements, and other applicable legislation.
- **Security & fraud prevention:** To detect and prevent fraudulent accounts, sanctions violations, money laundering, and platform abuse.
- **Platform improvement:** To analyse usage patterns and improve the relevance and quality of our services using aggregated, anonymised data only.
- **Customer support:** To respond to queries, complaints, and requests submitted through our support channels.

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4 Legal Basis for Processing

We process your personal information on the following legal grounds as recognised under POPIA and GDPR:

- **Contractual necessity:** Processing required to deliver the services you have registered for and contracted with Trade Grid to provide.
- **Legal obligation:** Processing required to comply with POPIA, FICA, tax legislation, sanctions regulations, and other applicable law.
- **Legitimate interest:** Processing for fraud prevention, platform security, network integrity, and aggregated analytics — where these interests are not overridden by your rights.
- **Consent:** Processing for optional features such as marketing email communications. You may withdraw consent at any time by updating your account preferences or emailing privacy@tradegrid.com.

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5 Sharing of Information

Trade Grid does not sell, rent, or trade your personal information. We may share information in the following limited circumstances:

- **Other Verified Users:** Your Business Profile (excluding sensitive documents, ID numbers, and financial details) is visible to other verified Users for trade matching and networking purposes.
- **Service Providers:** Trusted third-party vendors who assist in operating the Platform — including cloud hosting providers, payment processors, email delivery services, and analytics platforms — under strict data processing agreements requiring equivalent privacy protections.
- **Regulators & Law Enforcement:** Where required by law, court order, regulatory directive, or to protect the rights, property, and safety of Trade Grid, its Users, or the public.
- **Business Transfers:** In the event of a merger, acquisition, restructuring, or sale of substantially all of our assets, your information may be transferred to the successor entity subject to equivalent or greater privacy protections.

Trade Grid will never share your verification documents, national ID number, or bank confirmation letter with any other User or third party without your explicit written consent.

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6 Data Retention

We retain your personal information only for as long as necessary for the purposes set out in this policy, and in compliance with our legal obligations:

- **Active accounts:** Full profile, document, and transaction data are retained for the duration of your account.
- **After account closure:** Core business and identity records are retained for 5 years to meet legal, tax, and compliance obligations.
- **FICA records:** Due diligence and identity verification records are retained for a minimum of 7 years as required by the Financial Intelligence Centre Act.
- **Usage logs:** Platform usage and audit logs are retained for 2 years for security and compliance purposes.

After the applicable retention period, data is securely and irreversibly deleted or anonymised using industry-standard methods. We will confirm deletion upon written request where legally permissible.

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7 Security Measures

Trade Grid implements the following technical and organisational security measures to protect your personal information against loss, theft, unauthorised access, disclosure, alteration, or destruction:

- AES-256 encryption for all documents and sensitive data stored in our Document Vault and databases.
- TLS 1.3 encryption for all data transmitted between your browser/app and our servers.
- Role-based access controls (RBAC) applying the principle of least privilege — staff can only access data necessary for their role.
- Multi-factor authentication (MFA) required for all system administrators and platform operators.
- Annual independent third-party penetration testing and quarterly vulnerability assessments.
- ISO 27001-aligned information security management policies and procedures.
- Documented and tested incident response plan with defined escalation procedures.

Despite these measures, no system can be guaranteed to be completely secure. You use the Platform at your own risk. Please report any suspected security incidents immediately to security@tradegrid.com.

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8 Your Rights as a Data Subject

Subject to applicable law and POPIA, you have the following rights regarding your personal information:

- **Right of Access (Section 23 POPIA):** Request confirmation of whether we hold your information and receive a copy of it.
- **Right to Correction (Section 24 POPIA):** Request correction of inaccurate, incomplete, or outdated information.
- **Right to Deletion:** Request erasure of your information, subject to our legal retention obligations.
- **Right to Object:** Object to processing of your information based on legitimate interest grounds.
- **Right to Data Portability:** Receive your data in a structured, commonly used, machine-readable format.
- **Right to Withdraw Consent:** Withdraw consent for marketing or optional processing at any time without affecting past processing.
- **Right to Lodge a Complaint:** Submit a complaint to the Information Regulator of South Africa at www.inforeg.org.za.

To exercise any of these rights, email privacy@tradegrid.com with the subject line "Data Subject Request". Please include your name, account email, and a description of your request. We will respond within 30 days.

9 Cookies & Tracking Technologies

We use cookies and similar tracking technologies on our Platform. Cookies are small text files stored on your device that help us provide and improve our services.

- **Essential cookies:** Required for the Platform to function — maintaining your session, authentication state, and security tokens. These cannot be disabled.
- **Preference cookies:** Remember your settings such as dark mode, language, and layout preferences.
- **Analytics cookies:** Help us understand how Users interact with the Platform so we can improve the experience. Data is aggregated and anonymised.
- **Marketing cookies:** Used only with your explicit consent to deliver relevant content and measure campaign effectiveness.

You can manage cookie preferences through your browser settings or our in-platform cookie consent tool. Disabling essential cookies will impair Platform functionality and may prevent login.

10 Cross-Border Data Transfers

Trade Grid may transfer your personal information to countries outside South Africa where our service providers operate, including the European Union and United States. All cross-border transfers are subject to the following safeguards:

- Standard contractual clauses (SCCs) as approved by the relevant data protection authorities.
- Adequacy decisions recognising equivalent levels of data protection.
- Binding corporate rules applicable to our group of companies.
- Your explicit consent where required for specific transfers.

We ensure that all international service providers are contractually bound to POPIA-equivalent data protection obligations before any transfer of your information takes place.

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11 Updates & Contact

We review and update this Privacy Policy at least annually and whenever material changes occur in our processing activities, applicable legislation, or regulatory guidance.

Material changes will be communicated via email notification and prominent notice on the Platform at least 14 days before taking effect. The "Effective Date" at the top of this document reflects the date of the most recent revision.

PRIVACY CONTACT

Information Officer, Trade Grid (Pty) Ltd

1437 Market Street, Johannesburg, Gauteng, South Africa 2094

Email: privacy@tradegrid.com

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

Information Regulator of South Africa: www.inforeg.org.za | inforeg@justice.gov.za