

SINGULAR SYSTEMS (PTY) LTD
PRIVACY AND COOKIES POLICY

WHO WE ARE

This website www.otcexpress.co.za ("**our site**") is operated by Singular Systems Proprietary Limited ("**Singular**" or "**we**" or "**us**"). Further details are set out in our **Website and Bulletin Board Terms and Conditions**.

PURPOSE OF THIS PRIVACY AND COOKIES POLICY

We are committed to the privacy and confidentiality of information provided to us. This Privacy and Cookies Policy describes our current policies and practices with regard to any personal information or data collected by us from you directly and/or through our site.

Personal information or data means information which identifies you, and includes information such as your name, email address, telephone number, your username and password, as well as any other personal information or data collected.

NOTIFICATION OF CHANGES TO PRIVACY AND COOKIES POLICY

We are continually improving our methods of communication and adding new functionality and features to our site and to our existing or future services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this Privacy and Cookies Policy to describe our new practices. We encourage you to check this page regularly.

COLLECTION OF YOUR PERSONAL INFORMATION OR DATA

We may collect the following information on our site, or telephonically through our helpdesk, about our users (which may include sellers and purchasers of securities ("**Clients**")):

- Title
- First Name
- Last Name
- ID Number
- Date of Birth
- Gender
- Race
- Cell Phone number
- Telephone number
- Email address
- Residential Address
- Postal Address
- Country of residence
- Tax Reference Number
- Any other information which we may require from you, including information which is required in terms of applicable laws, including FICA.

OUR USE OF YOUR PERSONAL INFORMATION OR DATA INCLUDING TELEPHONE RECORDINGS

Telephone calls

You consent to us recording all telephone calls which we make to you or which you make to us.

Uses of personal information

By agreeing to the Terms and Conditions and as far as the law permits, you give us (as well as third parties who perform services on our behalf) permission, for all purposes relating to the Bulletin Board and our site, to, among other things:

- use your personal information and all telephone recordings. This includes registering transfers of securities, processing trades, matching trades, arranging payments, and sending you notices;
- collect, get, receive, record, organise, collate, store, update, change, retrieve, read, use and share all of the personal information and telephone recordings with third parties, including our service providers;
- transfer and/or store your personal information and telephone recordings outside of South Africa; and
- use your personal information for any other legally permissible purpose.

You may request us at any time to correct or confirm any personal information if it is wrong or out of date.

You warrant that you have the authority to permit us to deal with your personal information as indicated above and you indemnify us against any loss which we may suffer in the event that you did not have the proper authority to permit us to deal with your personal information as set out above.

We will endeavour to take all legally permissible measures to protect your personal information, but we are not responsible for any loss or damage which you may suffer as a result of unauthorised uses of your personal information, including, but not limited to, any damage or losses which you may suffer as a result of any identity theft.

DISCLOSURE OF YOUR PERSONAL INFORMATION OR DATA

We do not share, sell or distribute your personal information or data with unrelated third parties, except as otherwise provided for in this Privacy and Cookies policy and under these limited circumstances:

- We may share your information with Brokers, Representatives, Issuers, and Clients, for purposes of negotiating and facilitating transactions in securities.
- In order to provide you with the information, services or products which you have requested, your personal information or data may occasionally be transferred or shared with third parties who act for us for further processing in accordance with the purposes for which the personal information or data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your personal information or data in order to support our information technology or to handle mailings on our behalf.
- We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or our site, to take precautions against legal liability, or in the event of our sale, merger, reorganisation, dissolution, disposal of all or part of our assets or similar event.
- By agreeing to the Terms and Conditions, you consent to us sharing your personal information or data with other organisations or companies whose activities, products and/or services may be of interest to you. Where appropriate, before disclosing personal information or data to a third party, we contractually require the third party to take adequate precautions to protect

that data and to comply with applicable law. If you do not wish to consent to us sharing your data, you must indicate this choice by opting-out on your personal profile.

ANONYMOUS DATA COLLECTED THROUGH OUR SITE

In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our site. For example, our web server automatically logs which pages of our site our visitors view, their IP addresses and which web browsers our visitors use. This technology does not identify you personally; it enables us to compile statistics about our visitors and their use of our site.

Our site contains links to other pages on our site. We may use technology to track how often these links are used and which pages on our site our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these links.

Likewise, if you reached our site by clicking on a link or advertisement on another website, we also log that information. This assists us to maximize our Internet exposure as well as understand the interests of our users. All of this information is collected and used only in the aggregate: it is entered into our database, where we can use it to generate overall reports on our visitors, but not reports about individual visitors.

COOKIES

In order to collect the anonymous data described in the preceding paragraph, we may use temporary “cookies” that remain in the cookies file of your browser until the browser is closed.

Cookies are small, often encrypted text files, located in browser directories. They help users navigate websites efficiently and allow certain functions, such as buying products online. When you visit websites, cookies may be stored on your computer. They are used to store a variety of information about you and your preferences, which is afterwards sent back to the visited website.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our site this may limit its functionalities or performance.

Our use of cookies is to enable more user-friendly, efficient and safe visits to our site. We use cookies to -

- identify you as a registered user;
- provide you with safe restricted access areas;
- remember you so that when you come back to our site you do not need to enter your information again; and
- understand what brought you to our site and what pages you visited.

Besides these, we may also use cookies which enable us to save your preferences from each of your visits to our site and present you with a version of our site which reflects your preferences. Our system is therefore able to recognize you each time you visit our site, without requiring you to systematically log in each time you visit.

You can find more information about cookies at: <http://www.allaboutcookies.org/> and for a video about cookies visit <http://www.google.com/policies/technologies/cookies/>.

We also use your IP address to help diagnose problems with our server, to administer our site and to gather broad demographic information.

We may also perform IP lookups to determine which domain you are coming from (i.e. yourcompany.com) to more accurately gauge our users' demographics.

ACCESS AND CORRECTIONS TO PERSONAL INFORMATION OR DATA

Upon receipt of your written request and enough information to permit us to identify your personal information or data, we will disclose to you the personal information or data we hold about you, for which we may make a charge as allowed by applicable law.

We will also correct, amend or delete any personal information or data that you tell us is inaccurate and notify any third party recipients of the necessary changes. You may update any information you have given to us by contacting us at our registered address or email address: otc@singularservices.co.za.

Requests to delete personal information or data are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

UNAUTHORISED THIRD PARTY ACCESS TO YOUR INFORMATION

Despite the security measures we have in place to protect your personal information or data, firewalls, password access and encryption methods and the like you acknowledge that your personal information stored by us, may be accessed by unauthorised third party, e.g. as a result of an illegal activity.

In the unlikely event of such access by an unauthorized third party, we will use our best endeavors to notify you via email (using the address you have provided to us, if any) of such occurrence.

LINKS TO OTHER WEBSITES

Our site may contain links to websites that are not operated by us. These links are provided for your reference and convenience only and do not imply any endorsement of the activities of these third party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any Privacy and Cookies Policy posted on any website you visit before using the website or providing any personal information or data about yourself and others.

TRANSFER OF DATA ABROAD

If you are visiting our site from a country other than the country in which our servers are located within South Africa, the various communications will necessarily result in the transfer of information across international boundaries.

By visiting our site and communicating electronically with us, you consent to the processing and transfer of your personal information or data as set out in this Privacy and Cookies Policy.

We may also transfer your personal information or data to other countries, in which case we will comply with any relevant data protection laws, which may not be similar to the data protection laws of the Republic of South Africa.

FEEDBACK

We welcome comments about this Privacy and Cookies Policy. If you have any questions about this Privacy and Cookies Policy or any part of our service, you may contact us by e-mailing otc@singularservices.co.za or by writing to us at Singular Systems, PO Box 1266, Bramley, 2018. We may store any correspondence from you.