

# JUST ENERGY TRANSITION FUNDING PLATFORM PRIVACY POLICY

Last Updated: 24 October 2024

## Introduction

We are committed to protecting your privacy and complying with applicable data protection and privacy laws, and we will make every effort to be compliant with the Protection of Personal Information Act (POPIA) and will only collect, process, transfer and/or disclose your personal information for the purpose of rendering our services (either to you or in relation to you), verifying your identity, detecting fraud and preventing money laundering and enforcing compliance with laws and public duties. This privacy policy tells you about our online collection and use of data when you use our proprietary software applications, mobile applications, products, services, systems and/or platforms (“Solutions”). The terms of this policy apply to the Solutions, our site <https://jetfundingplatform.org.za> (“Site”) and to the services which we offer through the Solutions and the Site and, in respect of your use of the Site and services offered through the Site, are further subject to our <https://jetfundingplatform.org.za/enduserlicenceagreement.pdf>, unless different terms are specified in a form or contract provided to you by us (either online or offline).

Please review this privacy policy before using the Site or the Solutions. If you do not agree with this privacy policy, do not use the Site or the Solutions. By using the Site or the Solutions, you (i) understand and agree to be bound by the terms of this policy, and (ii) expressly consent to us collecting, using, storing or otherwise processing your personal information as set out in this policy, for the purposes indicated herein.

The Site and the Solutions are owned and operated by Just Energy Transition Project Management Unit (JET PMU) (“us”, “we”, “our”) and may be accessed both in South Africa and abroad. For data protection purposes, we are the controller and, unless otherwise noted, are also the processor of data. You consent to any of your personal information collected by us being retained indefinitely, and agree that it may be stored, processed, accessed, and used in jurisdictions whose privacy laws may be different and less protective than those of your home jurisdiction.

## Core Principles

Your privacy is important to us, so we’ll strive to protect the information you share with us. To protect your privacy, we follow certain basic principles in accordance with global best practices relating to customer privacy and data protection. Except to the extent provided for in this policy, we won’t sell or give away your name, e-mail address, phone number, or any other personal information to anyone without your express consent and we’ll use industry-standard security measures to protect your information from unauthorised users.

## Collection of Your Personal Information

When you visit the Site or access or use the Solutions, certain kinds of information, such as the Web site that referred you to us, your IP address, browser type and language, and access times, may be collected automatically as part of the Site or the Solutions’ operation. We may also collect navigational information, including information about the pages you view, the links you click, and other actions taken in connection with the Site or the Solutions.

We may combine your visit and navigational information with personal information that you provide. You may always choose not to provide personal information, but, if you so choose, certain products and services may not be available to you.

Personal information (i.e. any information by which you can be identified, and which relates to you as an identifiable individual, such as your name, e-mail address, gender, age, etc.) may be collected when you register for any Solutions, contact us through the Site or otherwise provide us with information as part of communications with us. Additional personal information (e.g., banking details ) may be collected when you register or submit an applications on our Site. to process or to provide you with services.

You warrant that: (i) any personal information that you provide to us will be complete, accurate and correct, (ii) you will keep us informed of any changes in such personal information, and (iii) you will provide us with any reasonable assistance that we may require in order to enable us to comply with our obligations under applicable privacy laws, and you indemnify us against and hold us harmless from any claim, damages, penalty or fine as a result of a breach of any of these warranties.

### **Use of Your Personal Information**

We collect and use your personal information to operate and improve the Site and the Solutions, to process and provide the services and information you select, to better understand our users, to provide better services, and to assist us with administration, such as with troubleshooting any problems, detecting fraud, resolving disputes, and for any purposes deemed necessary or required by us to enforce the [\[https://jetfundingplatform.org.za/websitetermsfuse.pdf\]](https://jetfundingplatform.org.za/websitetermsfuse.pdf) and other terms or conditions applicable to any portion of the Site or your access to or use of the Solutions.

We may also use your contact information to enable us to communicate with you and to send additional communications related to the Site and/or the Solutions. We may also send you newsletters or other information that may be of interest. If you do not wish to receive additional communications, please email us on the contact details provided on our site with instructions on each communication. Please keep in mind that, if you choose not to receive additional communications, you will continue to receive transactional or account communications (e.g., confirmation e-mails), where applicable.

Personal information collected by us may be stored and processed in South Africa or any other country in which we or our service providers or agents maintain facilities, and by using the Site, the Solutions and our services, you consent to any such transfer of information outside of your country.

### **Notice to European Users**

Please note that the information you enter on the Site or provide to us, whether through the Solutions or otherwise, may be transferred outside of the European Economic Area, for purposes of processing by us, located in Johannesburg, South Africa, or our authorised partners, located worldwide, including countries which may not offer an equivalent level of protection to that required in the European Union, in order to provide the Site and the Solutions to you. The European Union's General Data Protection Regulation allows for transfer of personal data from the European Union to a third country if the individual has explicitly consented to the transfer of personal information, regardless of the third country's level of protection. By agreeing to this privacy policy, you consent to the transfer of all such information to South Africa and other countries which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information as described in this privacy policy.

If you would like to exercise any of your data protection rights (including the right to have your personal information deleted), please contact us using the *"Access to Your Personal Information"* section below.

### **Sharing of Your Personal Information**

Except as disclosed in this privacy policy, we do not share your personal information with any outside parties.

On occasion, we may offer, in conjunction with third parties, certain services that may require you (or us) to share your personal information with that third party as a condition for providing that service. While we will treat any information we receive in accordance with this privacy policy, we will not be responsible for the information submitted by you to that third party and we remind you to review the applicable rules and any third party's applicable privacy policies separately before participating in such service.

You expressly consent to us sharing your personal information with service providers who perform services on our behalf. Specifically, we may hire other companies or persons to handle the processing of data, to provide data storage, to host Web sites, to assist in communications, to conduct audits, etc. Those companies or persons will be permitted to obtain only the personal information they need to provide the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose. Information about our users, including personal information, may be disclosed as part of any merger, acquisition, or sale of the company and/or its assets, as well as in the unlikely event of insolvency, bankruptcy, or receivership, in which case personal information would be transferred as one of the business assets of the company. We may notify you of such an occurrence as described in the *"Changes to This Privacy Policy"* section below.

We reserve the right to disclose your personal information, without notice, if required to do so by law, or in the good-faith belief that such action is reasonably necessary to comply with legal process, respond to claims, or protect the rights, property or safety of our company, employees, users, or the public.

### **Security of Your Personal Information**

Whilst we cannot guarantee the absolute security of your personal information, we take all commercially reasonable measures and precautions to keep it secure and protect it from loss, misuse, unauthorised access or disclosure by following generally accepted security practices, including the use of encryption and logical and physical access control mechanisms, as well as taking reasonable steps to identify all reasonably foreseeable internal and external risks to the personal information in our possession or under our control, establishing and maintaining appropriate safeguards against the risks identified, regularly verifying that the safeguards are effectively implemented, and ensuring that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards. However, we cannot accept any liability whatsoever for any unauthorised access or loss of personal information despite our best endeavours.

### **Access to Your Personal Information**

You can write to us at any time to obtain details of the personal information we may hold about you at the following address:

**Data Protection Manager**

E-Mail: [helpdesk@jetfundingplatform.org.za](mailto:helpdesk@jetfundingplatform.org.za)

Please quote your name and address and a brief description of the information you want a copy of to enable us more readily to locate your data. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you. We may charge a fee to cover the reasonable administration costs involved.

### **Use of Cookies and Other Technologies**

We may use cookies to enable you to sign in to our services and to help personalise your online experience. A cookie is a small text file that is placed on your hard drive. Cookies contain information, including personal information that can later be read by a Web server in the domain that issued the cookie to you. The information that cookies collect may include the date and time of your visit, your registration information, and your navigational and purchase history.

In some cases, our third-party service providers may use cookies on our Site or Solutions. We have no access to or control over these cookies. This privacy statement covers the use of cookies by us only and does not cover the use of cookies by third parties.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, you may not be able to sign in or use other features of our Site, Solutions and services that depend on cookies.

In addition to cookies, we may use other technologies, including single-pixel images on our Site, Solutions and in promotional e-mail messages or newsletters. These tiny electronic images assist us in determining how many users have visited certain pages or opened messages or newsletters. We do not use these images to collect personal information.

### **Registration Data and Account Credentials**

During the registration process, you will provide your identifying particulars and contact information and select a password. It is your responsibility to maintain the confidentiality and security of your account credentials in respect of any account you have with us in relation to the Solutions or Site, including your password. Allowing others to access and use your account and password can compromise the security of your information. It remains your sole responsibility to ensure that you log out of your account when access is no longer required

to the Solutions or Site. We disclaim any responsibility or obligation for your decision to provide your account credentials to others, or to allow any third party to access or use the Solutions or Site through any device which is logged on to your account. Access by means of such credentials, and use of the Solutions or Site through any device which is logged on to your account, will, at all times, be deemed made by you, and you will be responsible for any such access.

### **Interactive Areas**

The Site or Solutions may include interactive areas or services, including, without limitation, blogs, discussion forums, chat rooms, bulletin boards, message boards, online hosting or storage services, or other areas or services in which you, registered Site members or third parties create, post or store any information, content, messages, comments, materials or other items on the Site or Solutions ("Interactive Areas").

If you use an Interactive Area, you should be aware that these areas are open to the public and any personal information you post or provide at registration may be viewable by others and thereby becomes public information. You should exercise caution when deciding to disclose your personal information in Interactive Areas. If you decide to submit any personal information in connection with the Interactive Areas, that information is exempt from this privacy policy and we are not in any way responsible for such information, nor for how others might use that information, including sending you unsolicited messages. Interactive Area postings may be retained indefinitely.

### **Surveys**

From time to time, we may make online surveys available to users of the Site or Solutions. Participation in those surveys is voluntary. Some online surveys may ask participants for personal information, such as an e-mail address, in addition to requesting answers to survey questions. We may use that personal information to contact the participant if necessary, or as otherwise described above. We may make the results of any survey publicly available, although we will not attribute any particular response to you without your permission.

### **Minors**

We do not intend to offer services to or solicit or collect personal information from anyone under the age of 18. If you are under 18 (or the age of majority in your country), you should not use or enter information on the Site or the Solutions.

### **Links**

We may link to Web sites that have different privacy policies and practices from those disclosed here. We assume no responsibility for the policies or practices of such linked sites and encourage you to become acquainted with them prior to use.

### **Disclaimers**

We intend to take commercially reasonable precautions to abide by this privacy policy. Nevertheless, in the event that we do not comply with all terms contained in this privacy policy, you agree, by using the Site or the Solutions and by submitting information to the Site, through the Solutions or through any other communication you have with us, that your sole and exclusive remedy against us will be to have us promptly correct the handling of your information in the future to accord with this privacy policy and to notify anyone to whom we directly transferred any information of the correct information or to cease using such information.

To the maximum extent allowed by law, we, our subsidiaries, affiliates, and divisions disclaim any other obligation, liability, or warranty to you for any other action, inaction, omission, or other activity that is not in accordance with this privacy policy.

Under no circumstances shall we, our subsidiaries, affiliates and divisions, or their suppliers or licensors be liable for any direct, special, incidental, indirect, economic, consequential or punitive damages (including, without limitation, loss of data or loss of use damages or lost profits) arising out of or connected with this privacy policy, or the failure by us, our subsidiaries, affiliates and divisions, or their suppliers or licensors to adhere to it, even if we, our subsidiaries, affiliates and divisions, or their suppliers or licensors have been

notified of the possibility of any damages. This section shall only apply to the maximum extent permitted by applicable law.

We do not exclude (i) liability for damage to any property or death or personal injury caused by the negligence or wilful misconduct of our company, its employees or authorised representatives or (ii) liability for fraud.

### **Applicable Law and Jurisdiction**

This privacy policy is governed by and will be interpreted according to the laws of the Republic of South Africa, and all disputes, claims and other matters in connection with this privacy policy will be determined in accordance with such laws.

### **Changes to This Privacy Policy**

We reserve the right to change the terms of this privacy policy at any time. When we make changes, we will revise the "*Last Updated*" date at the top of the policy. If there are material changes to this statement or in how we will use your personal information, we will notify you by prominently posting a notice of such changes here or on our home page, or by sending you an e-mail. We encourage you to review this policy whenever you visit our Site or access our Solutions.

### **Contact Information**

If you have questions or concerns regarding this privacy policy, or if, for some reason, you believe we have not adhered to these principles, please contact us by e-mail at [helpdesk@jetfundingplatform.org.za](mailto:helpdesk@jetfundingplatform.org.za)