PRIVACY POLICY:

Aru is committed to respect your privacy and to comply with applicable data protection and privacy laws. This privacy policy describes how we collect and use personal data.

- "Personal data" means information relating to you or another identifiable individual
- "3rd Party Service provider" means the product and service providers we have contracts with to supply their products and services.
- "Client Access Portal" this is any Software used on a mobile device or computer by a client to access their information and profile on a product or service.

Our products or services may contain links to, or may be embedded within, other companies' websites and services that have privacy policies of their own.

1. **What information do we collect?**
   We collect your personal data and other information when you book an appointment, purchase a product, service or when interacting with Aru.
   This includes the following categories:

2. **Use of products and services**
   When you access a 3rd party Client access portal, if there are secure logins where a username and password is required. The servers keep track of your login and activity on the site. Clients must use strong passwords and keep their login credentials safe and not to share with anyone.

3. **Information you provide us with**
   When you book an appointment, make a purchase, request services, participate in research or campaigns or otherwise interact with us, we may ask for information such as your name, email address, phone number, street address, feedback, information relating to your age, gender, and language, bank account details and other such financial information.
   We also maintain records of your consents, preferences and settings relating to, for example, location data, marketing and sharing of personal data.

4. **Your transactions with us**
   We maintain records of your purchases, the information & documents you have provided us with, your requests, agreements between you and Aru, the products and services provided to you, payment details, your contacts and communications and other interactions with us. We may, in accordance with applicable law, record your communication with our Client Care, Representatives or with 3rd party service providers.

5. **Positioning and Location data**
   Location-based services establish location through the use of satellite, mobile, Wi-Fi, Bluetooth or other network based positioning methods. These technologies may involve exchanging your location data and unique device and mobile, Wi-Fi, Bluetooth, or other network related identifiers with Aru or our 3rd party service provider. We do not use this information without your consent and some of this data may be required for a particular product you may have purchased.

6. **Information provided by partners**
   We obtain information from industry partners and a variety of other sources. We require these sources to comply with applicable laws with regard to collecting and transferring this data to us, including ensuring that there is a legal basis for the transfer or anonymizing the data in accordance with applicable laws prior to disclosure of the data to us.

Aru may process your personal data for the following purposes. One or more purposes may apply simultaneously.

I. **Providing products and services**
We may use your personal data to provide you with our products and services, to process your requests or as otherwise may be necessary to perform the contract between you and Aru, to ensure the functionality and security of our products and services, to identify you as well as to prevent and investigate fraud and other misuses. Policy creation requires you to provide us with basic contact details about yourself, such as name, email address, country of residence, date of birth, etc.

II. **Managing products and services**
We may use your personal data to manage our products, services, client care, sales and marketing. We may combine personal data collected in connection with your use of a particular product supplied by one of our 3rd party service providers/insurers and/or service with other Aru personal data we may have about you, unless such personal data was collected for a purpose, where the original purpose is incompatible with this purpose.

III. **Communicating with you**
We may use your personal data to communicate with you, for example to book an appointment, contact you for client care related purposes and follow up on products and services purchased.

IV. **Marketing, advertising and making recommendations**
We may contact you to inform you of new products, services or promotions we may offer and to conduct market research when we have your consent or it is otherwise allowed. We may use your personal data to personalize our offering and to provide you with more relevant services.

7. **What is our legal basis for processing your Personal Data?**
Our legal basis for processing your personal data is dependent on the purpose for processing and may vary as applicable to your product(s) or service/s. In general, we process your personal data under the following legal bases:

I. **Performance of a contract with you**
We process your personal data to perform our obligations applicable to your product or service.

II. **Your consent**
We process your personal data if you have consented to the processing activity. You may revoke your consent at any time. Doing so will bar us from further processing of your personal data based on your consent, but will not impact the lawfulness of processing based on your consent before it was withdrawn.

III. **Legal obligations**
We process your personal data as needed to comply with laws and regulations.

8. **How long do we retain Personal Data?**
We endeavour to only collect personal data that is necessary for the purposes for which they are collected, and to retain such data for no longer than is necessary for such purposes. The

length of time personal data is retained, and criteria for determining that time, is dependent on the nature of the personal data and the purpose for which it was provided. You may contact Aru's Information Officer via client.care@arufsp.co.za to obtain additional information about retention of your personal data.

9. **Do we share Personal Data?**
We do not sell, lease, rent or otherwise disclose your personal data to anyone, unless otherwise stated below.

I. **Your consent and social sharing services**
We may share your personal data if we have your consent to do so. Some services may require the client to share selected personal data with authorized third party service providers who process the personal data for the purposes described in this Policy. For example, insurer's policy, etc. Aru will never ask you to disclose codes or pins of any nature. To avoid duplicate or unnecessary communications we may need to match information that Aru has collected with information that the authorised third party service proved may have collected where this is permitted by law.
These authorized third parties are not permitted to use your personal data for any other purposes and are required to use appropriate security measures to protect your personal data.

II. **International transfers of personal data**
Products and services may be provided using resources and servers located in various countries around the world. Therefore your personal data may be transferred across international borders outside the country where you use our services, including to countries outside the European Economic Area (EEA) that do not have laws providing specific protection for personal data or that have different legal rules on data protection, for example, the United States of America. In such cases we ensure that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law, for example, by using standard contractual clauses approved by the European Commission or relevant authorities (where necessary) and by requiring the use of other appropriate technical and organizational information security measures. You may contact Aru's Information Officer via client.care@arufsp.co.za on information relating to the safeguards in connection with these personal data transfers.

III. **Mandatory disclosures**
We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where we or third parties acting on our behalf operate. We may also disclose and otherwise process your personal data in accordance with applicable law to defend Aru's legitimate interests, for example, in legal proceedings or in connection with governmental requests and filings.

IV. **Mergers and Acquisitions**
If we decide to sell, buy, merge or otherwise reorganize our businesses in certain countries, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers.

10. **How do we address the privacy of children?**

Aru does not knowingly collect information of children without the consent of their parents or guardians.

11. **How do we address Data Quality?**
    We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data. We encourage clients to access & update their personal data from time to time to ensure that it is up to date.

12. **What steps are taken to safeguard Personal Data?**
    Privacy and security are key considerations in the creation and delivery of our products and services. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering & training. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our data bases containing personal data to authorized persons having a justified need to access such information.

13. **What are the client's rights?**
    - Client has a right to know what personal data we hold about them, and to access it.
    - The right to update incomplete, incorrect, unnecessary or outdated personal data.
    - The right to request that their personal data be erased, and to obtain a copy of such data in a machine-readable format.
    - The right to object to or restrict processing in certain circumstances, such as where they believe the data is inaccurate or the processing activity is unlawful.
    - The right to unsubscribe from direct marketing messages.
    - May exercise their rights by contacting Subscriptions at client.care@arufsp.co.za . In some cases, especially if you wish us to delete or stop processing your personal data, this may also mean that we may not be able to continue to provide the services to you. Applicable data protection law may provide certain restrictions on the extent to which these rights may be exercised. If a restriction applies, we will respond to your request with an explanation of what action will be taken, to the extent required under applicable data protection law.

14. **Changes to this Privacy Policy**
    Aru may from time to time change this Policy at any time with or without notice.