

## Mirathi Privacy Policy

Effective Date: 01 September 2026

### INTRODUCTION

This Privacy Policy applies to information collected on Mirathi's website located at [www.mirathi.co](http://www.mirathi.co) ("Website") and/or mobile application (the "App") (collectively, the "Platform"). This privacy policy ("Privacy Policy") governs the processing (which includes the collection, use and sharing) of personal information by Mirathi which we may collect from you, or that you may provide to us either through the Website, the App or via email or other correspondence to us.

### IMPORTANT NOTICE

Please read the terms of this Privacy Policy carefully to understand our views and practices regarding your personal information and how we will treat it.

By visiting the Platform and/or submitting personal information to us, you agree to the practices described in this Privacy Policy and you agree to Mirathi, its directors, officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this Privacy Policy.

If you do not agree to this Privacy Policy, please do not use the Platform.

### DEFINITIONS

Unless otherwise determined by the context, the words and expressions used in this Privacy Policy shall bear the meaning assigned thereto as follows:

"personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to —

information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

information relating to the education or the medical, financial, criminal or employment history of the person;

any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

the biometric information of the person;

the personal opinions, views or preferences of the person;

correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

the views or opinions of another individual about the person; and

the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

"processing / process" means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including – the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information.

## PERSONAL INFORMATION WE COLLECT

If you participate on the Platform, you may give us:

contact information, such as your name, email address, mailing address, and phone number;

log-in information, including your Platform username and password;

information about your home, such as the area code or postal code where your home is located; and

billing information, such as credit card numbers, expiration date and security code and/or any other information regarding your other payment platforms such as Stripe, PayStack, or other digital payment accounts.

if you participate as a supplier through the Platform, information relating to your services and products, your experience, skills, eligibility to work, and availability; views or preferences you provide to us; and

Identification number, certifications and information relating to the legal entity through which you operate your business.

Although users of the Platform can submit credit card or other payment card information to pay for a service through the Platform, Mirathi does not receive this financial information itself. Payment card information is transmitted directly to a third-party payment card processor, PayStack, through an Internet connection secured by industry-standard Secure Socket Layer (SSL) encryption technology. PayStack then communicates to Mirathi whether your payment has cleared, but does not provide payment card information to Mirathi. PayStack's privacy policy is available at the following link <https://paystack.com/za/terms?q=/terms>

We collect information through technology to enhance our ability to serve you.

When you access and use the Platform, Mirathi and, in some cases, our third-party service providers collect information about how you interact with the Platform. We describe below a few of the methods we use to collect information through technology.

When you visit the Platform, we collect your Internet Protocol ("IP") address. An IP address is often associated with the portal you used to enter the Internet, like your Internet service provider ("ISP"), company, association, or university. While an IP address may reveal your ISP or geographic area, we cannot determine your identity solely based upon your IP address. However, we may link the last IP address you used to access the Platform to Personal Information you provide us.

We may also collect a unique identifier for your computer, mobile device, or other device used to access the Platform ("Device Identifier"). A Device Identifier is a number that is automatically assigned to the device you used to access the Platform.

We may link the Device Identifier to other information about your visit, such as what pages you viewed, and to Personal Information you provide us, such as your name. We may include small graphic images or other web programming code, called web beacons (also known as "pixel tags", "web bugs" or "clear GIFs"), in our web and mobile pages and messages. The web beacons are minute graphics with a unique identifier. They are used to track the online movements of users of our Platform. In contrast to cookies, which are stored in your computer hard drive, web beacons are embedded invisibly on Internet pages and are about the size of the period at the end of this sentence. Web beacons help us better manage content on the Platform by informing us what content is effective, monitoring how users navigate the Platform, counting users of the Platform, and counting how many e-mails sent by us were actually opened.

We do not support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit know that you do not want the websites collecting your Personal Information.

We do track your online activities over time and across third-party websites or online services. For example, we use web beacons to help us determine what links or advertisers brought you to our Platform. We also use third-party service providers to display advertisements to you on other websites based on your activities while on the Platform.

When you use the App, the App may automatically collect and store some or all of the following information from your mobile device ("Mobile Device Information"), including, but not limited to –

- the type of Internet browsers you use with the App;

- your preferred area site;

- your mobile operating system; and

- your phone number or other identifiers assigned to your mobile device, including: the IP address of your mobile device, the manufacturer and model of your mobile device.

We may also collect information about how you use the App, such as the amount of time you spend using the App, how often you use the App, and actions you take in the App. In addition, we may gather information about the website from which you downloaded the App to help us determine what App download site is most effective (collectively "App Usage Information").

We may link your Mobile Device Information and App Usage Information to Personal Information you have provided us, in which case we will treat the combined information as Personal Information.

## USAGE OF PERSONAL INFORMATION COLLECTED

Processing of Personal Information of both the Platform users will happen by electronic means, when downloading and registering on the Platform.

Mirathi collects only Personal Information that is necessary for the purposes described in this Privacy Policy. Mirathi will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the user. Mirathi takes reasonable steps to ensure that the information it collects is accurate, complete, current, and

reliable for its intended use.

Mirathi will retain Personal Information only for as long as is necessary to accomplish Mirathi's legitimate business purposes or for as long as may be permitted or required by applicable law.

We use the information we collect to serve our customers, consider applicants, market and promote our services, and improve your experience at the Platform.

Some examples include –

Facilitating the provision of services;

Addressing service complaints;

Communicating with you by email, telephone, or text message, in accordance with your wishes;

Managing payments for services;

Improving customer service;

Sending you marketing and promotional emails, unless you have told us you do not want to receive such emails;

Troubleshooting technical problems on the Platform;

Responding to questions and feedback;

Conducting research and analysis;

Marketing and advertising products and services;

Continuously evaluating and improving the online and mobile user experience;

Preventing, discovering and investigating violations of this Privacy Policy or any applicable terms of service or terms of use for the Platform, and investigating fraud, chargebacks or other matters; and

Contacting you with regard to your use of the Platform and, in our discretion, changes to the Platform and/or the policies relating thereto.

## COOKIES AND ANALYTICS

We use cookies and similar technologies on the Platform. We use Google Analytics, a web analytics service provided by Google, to understand how the Platform is used, for example which pages are visited and where visits come from. Google Analytics uses cookies and collects information such as your IP address and device identifiers, and this information may be processed on servers located outside South Africa. You can read how Google uses this information at <https://policies.google.com/technologies/partner-sites>. We may also use Google advertising services, which use cookies to measure whether advertisements lead to actions on the Platform.

## TRANSFER OF PERSONAL INFORMATION TO THIRD PARTY AND CROSS BORDER

We may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose account and other Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Mirathi, our users, or others. This includes exchanging Personal Information with other companies and organisations for fraud prevention and credit risk reduction.

Mirathi will comply with the Protection of Personal Information Act 4 of 2013 ("POPIA") before transferring Personal Information to a third party who is not a contractor of Mirathi. Before transferring Personal Information to a third-party contractor, such as an authorised service provider, Mirathi will obtain assurances from the agent that it will process Personal Information in a manner consistent with this Privacy Policy. Where Mirathi learns that a third party contractor is using or disclosing Personal Information in a manner contrary to this Privacy Policy, Mirathi will take reasonable steps to prevent such use or disclosure.

We reserve the right to disclose and transfer your information, including your Personal Information –  
to a subsequent owner, co-owner, or operator of the Platform or successor database;  
and in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

#### PROCESSING OF PERSONAL INFORMATION OF CHILDREN

Section 34 of the POPIA does not permit Mirathi to process Personal Information concerning children. Thus we do not collect any information from anyone under 18 years of age. The Platform, and products and services offered through it, are all directed to people who are at least 18 years old or older. If you are under the age of 18, you are not authorised to use the Platform.

#### SECURITY

The security and confidentiality of your Personal Information is important to us. We have implemented technical, administrative, and physical security measures to protect your Personal Information from unauthorised access or disclosure and improper use.

For example, when clients pay for estate plans, the information they input is encrypted through SSL encryption. We do not store credit card information on our servers, and we use SSL encryption to protect your credit card information when it is transferred to our third-party payment processor. In addition, access to your Personal Information is restricted in our offices. Only employees who need the Personal Information to perform a specific job, for example, sales representatives, managers, and customer service staff, are granted access to Personal Information. All employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for our users' Personal Information.

It is important for you to protect yourself against unauthorised access to your account password and to your computer or cell phone. Be sure to log out of your account or to close your browser after you have completed your visit to the Platform.

Whilst we will do all things reasonably necessary to protect your Personal Information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your Personal Information, either by employees and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

#### DATA SUBJECT ACCESS AND PARTICIPATION

Upon reasonable request and in accordance with applicable law, Mirathi will grant users reasonable access to their Personal Information and will permit them to correct, amend or delete Personal Information that is incomplete or inaccurate.

You may contact [info@mirathi.co](mailto:info@mirathi.co) in order to update, correct, or delete your Personal Information. You may also update, correct, and delete some of your Personal Information through your account on the Platform. In addition, you may cancel or modify the email communications you have chosen to receive from the Platform by following the instructions contained in emails from us.

## RETENTION, STORAGE, ARCHIVE AND DISPOSAL

We will not keep your personal information for longer than is required to fulfil the purpose(s) for which we collected it, unless longer storage is authorised or required by law.

## BREACH OF PERSONAL INFORMATION

If you have a complaint concerning Mirathi 's processing of Personal Information, you should submit the complaint to [info@mirathi.co](mailto:info@mirathi.co)

Mirathi will investigate and attempt to resolve such complaints in accordance to the provisions contained in the POPIA.

## MARKETING

When using the Platform, you may be presented with opportunities to receive information or marketing offers directly from third parties. If you agree to share your Personal Information to receive this information or marketing offers, your Personal Information may be disclosed to such third parties. All the information you disclose to the third parties will be subject to the privacy policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to sharing your Personal Information with them. If you later decide that you no longer want to receive communication from such a third party, you will need to contact that third party directly.

If you have previously agreed to us using your Personal Information for direct marketing purposes, you may opt-out of such direct marketing at any time by writing to or emailing us at [info@mirathi.co](mailto:info@mirathi.co).

If you login to the Platform through a social networking site, such as Facebook, we may collect your Facebook authentication token and account identification number and use that information to provide you with access to your account on the Platform. We will apply this Privacy Policy to any Personal Information received from third parties, unless we have disclosed otherwise.

## MISCELLANEOUS

You may, at your choice, complete surveys on the Platform about, for example, your level of satisfaction with the Platform, your engagement with the Platform, and your awareness of Platform features. In some cases, we may link the information you provide in the survey with Personal Information in your Mirathi profile, such as your name or email address. When linked to Personal Information, your survey information becomes Personal Information too.

If you have any questions about this Privacy Policy, we'll do our best to answer them promptly. Here's how to contact us: [info@mirathi.co](mailto:info@mirathi.co)

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your Personal Information, we will notify you by prominently posting a notice of such changes before making them and by stating the effective date of the changes.