

Programmable Banking: Private Policy

Make PTY LTD (“Make ”, “us”, “we” or “our”) is committed to protecting your privacy. This Privacy Policy is intended to describe for you, as an individual who is a user of Spreadsheet Banking or our services, the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to read this privacy policy carefully when using our website or services or transacting business with us. By using our Spreadsheet Banking product, you are accepting the practices described in this privacy policy. If you have any questions about our privacy practices, please refer to the end of this privacy policy for information on how to contact us.

Make PTY LTD, Make places the utmost importance on the security and integrity of the personal data entrusted to it. Make undertakes to take all necessary precautions to preserve the security of personal data and, in particular, to protect personal data against any accidental or unlawful destruction, accidental loss, corruption, distribution or unauthorised access, as well as against any other form of unlawful processing or disclosure to unauthorised individuals.

To this end, Make implements security measures that comply with our industry’s standards to protect personal data from unauthorised disclosure. In addition, to avoid any unauthorised access and to guarantee the accuracy and proper use of personal data, Make has implemented appropriate electronic, technical and organisational measures to safeguard and preserve the personal data collected through its services.

Your acceptance of this private policy

By using our services, we imply that you have read this privacy policy and agreed to it. Your consent to be bound by this privacy policy will be confirmed when you tick the “I accept” box following your Microsoft account registration/login or wherever any consent is sought.

Information We Collect About You

We may collect personal information that can identify you, such as your name and email address, and other information that does not identify you. When you provide personal information through our website, the information may be sent to servers located in the EU and other countries around the world.

If you choose to use the Spreadsheet Banking service, we will request usernames and passwords in order to access information as it relates to your bank account and credit cards, investment account, or loans. Make does not store your usernames or passwords for financial institutions on its servers.

We work with our partner Investec to collect your bank account transaction data from your accounts on your behalf. Your transaction data is transmitted securely with TLS and stored on our servers, where your transaction descriptions are secured with 256-bit AES encryption. Investec also stores your data, subject to their own privacy policy.

We use various technologies to collect information from your computer and about your activities on our site. As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you.

We use cookies to remember users' settings, for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

Some of our pages utilise framing techniques to serve content from our partners. Please be aware that you are providing your personal information to these third parties.

How We Use the Information We Collect

We may use information that we collect about you to: deliver the products and services that you have requested; provide you with customer support; perform research and analysis about your use of our products or services; communicate with you by email or telephone about Make products or services; enforce our terms and conditions; manage

our business; and perform functions as otherwise described to you at the time of collection.

We aggregate your data and similar data from other users into larger sets of anonymous personal financial data. This aggregated information does not identify particular users or otherwise allow anyone to recover sensitive information about individual users. Aggregate information belongs to Make, and is not subject to this privacy policy.

How We Protect Your Personal Information

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure. For example, only authorised employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your sensitive personal information (such as credit card number) between your computer and our system, we encrypt the transmission of that information using Transport Layer Security (TLS) technology, and we also use firewalls to help prevent unauthorised persons from gaining access to your personal information. We want you to feel confident using our website to transact business. However, no system can be completely secure.

Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches, or other communications will always remain secure. If you have any questions about security on our website, you can contact us ***support@spreadsheetbanking.dev***

We collect the data on the following legal bases

Under the POPI Act, we are required to collect personal data for one or more of the following legal bases:

1. Based on your consent: We will collect certain data because you have consented to provide. Where we process your data based on your consent, you have the right to withdraw your consent at any time.
2. Where it satisfies our legitimate interest: We are allowed to collect certain data where it satisfies our interest and others. For example, where we collect data about how you use the website, we will use such information to improve our services, prevent fraud and improve your user experience.

3. To comply with our legal obligations: We will collect certain data, such as details about your browser and transactions to enforce our terms and conditions and comply with applicable laws (for example, where we are required to maintain records of transactions for certain periods).
4. To honour a contract: We will process some of your data in order to perform a contract we have with you. For example, where we are required to provide our services, we will need access to information about your customers.

Clients have the following choices and rights

General Rights: Generally, clients have certain choices and rights in relation to how we process their data:

- Withdrawing your consent: You may decide to not provide us with any personal data as required on the product or via other electronic means. However, if you do not provide us with such data, we may not be able to provide you with the service such data was requested for. For example, if you do not provide us with access to your data, we may not be able to provide you with insights.
- Data access and correction: You have the right to request access to and edit, correct or update the personal data you have submitted to us. You may request to exercise this right by directly emailing us at ***support@spreadsheetbanking.dev***.
- Data deletion requests: You have the right to request the deletion of your data or client account at any time. To request the deletion of your personal data or client account, directly email us via ***support@spreadsheetbanking.dev***. Please, note that we will only delete certain data to the extent permissible by law or where it does not override our legitimate interest (for example, where we are required by applicable law to retain records of transactions).

Rights under the POPI Act: If you are in South Africa, you have additional rights. These rights include:

- The right to request access to the personal data we hold about you, including requesting for it in a printable JSON format;
- The right to request that we move your data from our Services to another IT environment without affecting its usability;
- The right to object to or restrict the processing of certain data about you;
- The right to know which third parties we have shared your data with; and

- The right to report us to any data authority in your location if you believe we are processing your data unlawfully.

You may exercise any of the above rights by reaching out to us via

support@spreadsheetbanking.dev

How You Can Access Your Information

If you have an online account with us, you have the ability to delete your personal information online and close your account by contacting our support team at

support@spreadsheetbanking.dev

If you request to cancel your account we will delete your personal financial and transaction data. After you close your account, you will not be able to sign in to our product or access any of your personal information. However, you can open a new account at any time. If you close your account, we may still retain certain information associated with your account (such as your email address and certain communications with you) for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our website or our users, or take other actions otherwise permitted by law. If you close your account, we will delete the transaction data we have downloaded from your bank.

In addition, if certain information has been provided to third parties as described in this privacy policy, such as transaction data uploaded to your Excel document , retention of that information will be subject to those third parties' policies.

Third Parties

Any third parties to whom we may disclose personal information, including Microsoft and Investec, may have their own privacy policies which describe how they use and disclose personal information. Those policies will govern use, handling, and disclosure of your personal information once we have shared it with those third parties as described in this privacy policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the European Union.

Third-Party Websites

There are places on our website where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, to open your Excel document, you will be taken to MS Sharepoint that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy policies of all third-party websites you visit by clicking on the “privacy” link typically located at the bottom of the webpage you are visiting.

No Rights of Third Parties

This privacy policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the website.

Changes to this Privacy Policy.

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this privacy policy, we will revise the “last updated” date at the bottom of this document. If we make any material changes in the way we collect, use, and/or share your personal information, we will notify you by sending an email to the email address you most recently provided us in your account registration (unless we do not have such an email address), and/or by prominently posting notice of the changes on our website prior to the change becoming effective. We recommend that you check our website from time to time to inform yourself of any changes in this privacy policy or any of our other policies.

You may contact us

If you have any concerns, questions, issues, feedback, suggestions or ideas about this privacy policy, other agreements or our services, please reach out on the email addresses below: ***support@spreadsheetbanking.dev***