

WEBSITE AND APPLICATION PRIVACY POLICY & POPIA NOTICE

Praxis Marketing Consultancy (Pty) Ltd t/a Axario (“Axario”)

Effective Date: 7 October 2026

Last Updated: 7 October 2026

1. Introduction

Praxis Marketing Consultancy (Pty) Ltd, trading as **Axario** (“Axario”, “we”, “us” or “our”), respects the privacy of users and is committed to protecting personal information in accordance with the **Protection of Personal Information Act 4 of 2013 (“POPIA”)** and other applicable laws.

This Privacy Policy explains how Axario collects, uses, stores, shares and protects personal information when individuals:

- visit or interact with the Axario website;
- create or use an **Axario Home** account;
- access or use **Axario Business**;
- communicate with Axario;
- use Axario’s applications, features, integrations or related services; or
- otherwise provide personal information to Axario.

Axario provides two purpose-built experiences: **Axario Home**, which assists households with organising household information, and **Axario Business**, which assists organisations with managing assets, maintenance, compliance information, work orders, contractors and related operational records.

2. Responsible Party Details

The legal entity responsible for Axario is:

Praxis Marketing Consultancy (Pty) Ltd t/a Axario

Registration Number: **2025/558202/07**

Registered Address: **44 Old Kent Drive, Midstream Estate, Olifantsfontein, Gauteng, 1692, South Africa**

Website: www.axario.co.za

Email: ask@axario.co.za

For purposes of POPIA, Axario may act as either a **Responsible Party** or an **Operator**, depending on the circumstances in which personal information is processed.

3. When Axario Acts as Responsible Party or Operator

Axario acts as a **Responsible Party** where it determines the purpose and means of processing personal information. This includes, for example:

- user account creation and administration;
- subscription and billing administration;
- customer support and enquiries;

- platform security and access management;
- system and audit logging;
- website administration;
- legal and regulatory compliance;
- direct marketing, where applicable; and
- Axario's own business administration.

Axario may act as an **Operator** where personal information is processed through Axario Business on behalf of a customer that determines why and how that information is processed.

For example, where an organisation uses Axario Business to manage information relating to its own staff, contractors, clients, sites, work orders or operational records, that organisation may be the Responsible Party and Axario may process that information as its Operator.

Where Axario acts as an Operator, Axario processes personal information only on documented instructions from the applicable Responsible Party unless otherwise required by law. The relevant Responsible Party remains responsible for determining the purpose and means of processing and for complying with its obligations under POPIA and other applicable data protection laws.

4. Personal Information We May Process

The personal information processed by Axario depends on how the website or platform is used.

4.1 Website and Enquiry Information

Axario may process information such as:

- name and surname;
- email address;
- telephone number;
- company or organisation name;
- information submitted through contact or enquiry forms;
- correspondence with Axario; and
- marketing preferences.

4.2 Account and Login Information

Where a user creates an account, Axario may process:

- name and surname;
- email address;
- login and authentication information;
- account role;
- organisation or household membership;
- account preferences;
- access and activity logs; and
- security-related information.

4.3 Axario Home Information

Axario Home is designed to assist users in organising information relating to their home and household. Axario's website describes the platform as a private household environment for managing properties, vehicles, pets, documents, purchases, warranties, reminders and family information.

Depending on what users choose to enter or upload, Axario Home may process personal information including:

- names and preferred names;
- family or household relationships;
- dates of birth;
- identity numbers;
- contact details and addresses;
- photographs;
- emergency contact details;
- doctor and healthcare provider information;
- medical aid details;
- allergies;
- medical or health notes;
- blood group;
- medication information;
- mobility or dietary information;
- school, university or activity information;
- insurance and policy information, including insurance values;
- reminders and important dates, including reminder titles and message text entered by users;
- documents and attachments;
- receipts and supporting records;
- voice recordings and transcripts;
- photographs and scanned images;
- free-text notes;
- household expenses and home running costs;
- home improvement costs; and
- related household financial, property and expense-management information.

Axario Home may therefore process household financial and recordkeeping information where users choose to use features relating to expenses, home running costs, insurance values, property improvements or other household financial management.

Where a user enables an email reminder, the recipient's email address and the reminder title and message text are processed for the purpose of generating and delivering the reminder. Because reminder titles and message text are entered by users as free text, they may contain Personal Information about household members or other persons depending on what the user chooses to include.

Axario Home may also process special personal information and children's personal information, depending on the information voluntarily entered or uploaded by a user.

4.4 Axario Business Information

Axario Business may process information relating to:

- organisation and workspace users;

- employees or representatives of customers;
- contractors and service providers;
- contact persons;
- asset and site information;
- maintenance activities;
- inspections;
- work orders;
- compliance and certification records;
- incidents and corrective actions;
- insurance information;
- photographs and supporting evidence;
- uploaded documents;
- comments and free-text notes;
- audit and operational records;
- device location coordinates captured, with the user's permission, when certain location-enabled actions are performed; and
- site addresses and site coordinates used for mapping, geocoding and route-related functionality.

Where a user performs an asset scan, takes an asset photograph or performs a bulk scan and move, Axario Business may record the device coordinates associated with that action together with the name of the user who performed it. This information forms part of the asset's history and may constitute personal information relating to the user.

Axario Business provides role-based user and permission management and may include uploaded documents, work records, contractor information and other operational data.

4.5 Technical and Usage Information

Axario may automatically process technical and operational information such as:

- device and browser information;
- operating system;
- access date and time;
- login activity;
- application installation information;
- audit logs;
- error and diagnostic information;
- security event information; and
- IP address or, where applicable, a one-way encoded representation derived from an IP address.

Axario may maintain technical, security, audit and error records within its own systems where necessary for purposes such as security, troubleshooting, system integrity, application performance and compliance. Depending on the activity, these records may be linked to a signed-in user account.

Axario Home

Axario Home collects limited first-party usage and technical information for operational, security, product-improvement and service-performance purposes.

This may include:

- one application-open event per user session, including the initial page accessed, referring website, browser type and device platform;
- events relating to the display, selection or completion of an application installation prompt; and
- whether certain application features, including Search and Ask Axario, have been used.

Axario does not record the content of searches, questions submitted through Ask Axario, household information or the user's page-to-page navigation for these usage-measurement purposes.

Where a user is signed in, these usage events may be associated with the user's account and household.

Axario does not retain the user's raw IP address as part of these usage records. Where an encoded representation derived from an IP address is created for technical, security or measurement purposes, it is generated using a protected secret. If the required secret is unavailable, Axario does not create or store the encoded representation.

This information is collected directly by Axario and is accessible only to authorised Super Admin users. It is not provided to third parties for advertising or third-party analytics purposes.

Axario Business

Axario Business does not currently collect equivalent first-party usage-event analytics and does not maintain visit, page-view or usage-event analytics logs.

Axario Business does, however, maintain operational and audit records showing actions performed within the platform, including who performed an action, the nature of the action and when the action was performed. These records are maintained for operational, security, accountability and compliance purposes and are not used for behavioural advertising or general user profiling.

Marketing Website

Lovable's built-in Visitor Analytics feature is currently disabled for the Axario marketing website, Axario Business and Axario Home. Accordingly, Lovable does not currently collect visitor analytics through that feature for these projects.

For the Axario marketing website, Google Analytics 4, Meta Pixel and LinkedIn Insight Tag may process technical, usage and campaign-related information for analytics, marketing and campaign-measurement purposes only after the user has provided the applicable consent.

Google Tag Manager is used to manage and deploy applicable tags, and Google Consent Mode v2 is used to manage applicable Google consent signals in accordance with the user's cookie preferences and Axario's Cookie Policy.

With the user's applicable consent, Axario may also collect campaign and referral attribution information through its first-party attribution cookie, including UTM campaign parameters, landing-page and referring-site information and advertising click identifiers associated with platforms such as Google, Meta or LinkedIn. Where the user proceeds to Axario Home or Axario Business and subsequently creates an account, this attribution information may be associated with the user's account.

If the applicable consent is declined or withdrawn, further collection and transfer of campaign and referral attribution information through the applicable non-essential technologies is stopped. Information already associated with an Axario account will be processed and retained in accordance with this Privacy Policy.

4.6 Mobile Application Permissions

Where the Axario mobile application is used, the application may request access to certain device features where required to provide functionality selected by the user. Depending on the features used, these may include:

- **Camera** – for capturing photographs, documents, receipts or other records;
- **Photo Library / Media** – for selecting and uploading photographs or documents;
- **Microphone** – where voice-note or audio functionality is used;
- **Notifications** – to provide reminders, alerts and other application notifications;
- **Calendar** – where the user enables calendar integration; and
- **Location Services** – where supported and enabled, Axario Business may request one-off access to the device location when a user scans an asset, takes an asset photograph, performs a bulk scan and move, or opens the Nearby Jobs function.

Location is accessed only for the specific action initiated by the user. Axario does **not** continuously track a user's location and does not access location in the background.

Coordinates associated with asset scans, asset photographs and bulk asset movements may be stored in the asset's history together with the name of the user who performed the action.

Location and other embedded image metadata, including GPS/EXIF metadata, is removed from new photographs uploaded to Axario Home and Axario Business. This does not affect location coordinates separately recorded by Axario Business when a user intentionally performs a location-enabled action.

Location used for **Nearby Jobs** is used only to identify relevant nearby jobs and is not stored. If location permission is declined, the relevant functionality will continue to operate where possible, but without the location information.

Axario will request device permissions only where reasonably necessary for the relevant functionality. Users may allow, deny or subsequently change permissions through their device settings.

5. Children's Personal Information

Axario Business is not specifically designed for the processing of children's information. However, children's information may be included incidentally in records, documents, photographs or free-text fields uploaded by users.

Axario Home allows household members to record information relating to family members, which may include children.

Where children's Personal Information is processed, Axario will process such information only where permitted under POPIA, including where the processing is carried out with the prior consent of a competent person or another applicable ground under section 35 of POPIA applies.

Where appropriate, Axario may require a user to confirm that they are the child's parent, guardian or other competent person, or that they are otherwise lawfully authorised to provide and manage the child's Personal Information.

Users must not provide children's Personal Information through Axario unless they are lawfully entitled to do so.

6. Special Personal Information

Axario Home may process special personal information where a user voluntarily records information such as health or medical information.

This may include:

- allergies;
- medical notes;
- medical aid information;
- medication information;
- mobility information; and
- other health-related records.

Special personal information will only be processed where permitted under POPIA and will be subject to appropriate access and security controls.

7. How Personal Information is Collected

Axario may collect personal information:

- directly from users;
- when an account is created;
- when information is entered into Axario Home or Axario Business;
- through uploaded documents, photographs or recordings;
- through communications with Axario;
- through integrations enabled by users;
- automatically through technical, security, audit and system logs;
- from a user's device location, with permission, when the user activates a location-enabled Axario Business function;
- from a customer where Axario acts as an Operator; and
- from service providers supporting Axario's platform.

8. Purpose of Processing

Axario may process personal information for purposes including:

- providing and operating the Axario platform;
- creating and administering user accounts;
- enabling household or workspace collaboration;
- storing and organising information supplied by users;
- managing assets, maintenance, compliance and operational records;
- generating reminders and notifications;
- providing search and platform functionality;

- providing AI-assisted features where enabled;
- processing subscriptions and payments;
- responding to enquiries and support requests;
- managing security, access controls and fraud prevention;
- maintaining logs and audit trails;
- maintaining, troubleshooting and improving the security, performance and functionality of the platform;
- measuring limited usage of Axario Home for operational, service-performance and product-improvement purposes;
- understanding how users discover or are referred to Axario and measuring the effectiveness of marketing, advertising, referral and campaign activities, where applicable and subject to required consent;
- complying with legal and regulatory obligations;
- recording the location of certain asset-related actions, providing nearby-job functionality, and supporting site mapping, geocoding and route optimisation;
- enabling household expense, property, insurance and financial-recordkeeping functionality;
- investigating and managing security incidents; and
- communicating with users regarding Axario services.

Axario will not process personal information for purposes that are incompatible with the purpose for which it was collected, unless permitted by law.

Axario seeks to collect and process only the personal information reasonably necessary for the relevant processing purpose.

9. Lawful Grounds for Processing

Axario will process personal information only where a lawful basis exists under POPIA.

Depending on the circumstances, processing may take place where:

- the data subject has provided **consent**;
- processing is necessary to perform or conclude a **contract** to which the data subject is a party;
- processing is required to comply with an obligation imposed by **law**;
- processing protects a **legitimate interest of the data subject**;
- processing is necessary for the proper performance of a **public-law duty**, where applicable; or
- processing is necessary for pursuing the **legitimate interests of Axario or a third party** to whom the information is supplied, provided such processing is permitted under POPIA.

Where consent is relied upon, the data subject may withdraw that consent, subject to applicable legal or contractual limitations.

10. AI and Automated Features

Certain Axario features may use artificial intelligence or automated processing to assist users.

Axario Home

Depending on the feature used:

- **Ask Axario** may process relevant household records in order to answer a user's question;
- photo-reading functionality may send images for automated extraction;
- voice-note functionality may send audio for transcription; and

- information extracted from receipts, expense records or other uploaded content may be processed automatically.

Where applicable, these services may involve third-party technology providers such as **Google Gemini** and **OpenAI**.

Axario Business

AI-assisted functionality may include:

- Ask Axario;
- compliance summaries;
- suggested actions; and
- executive briefings.

Where these features are used, relevant text or summaries of workspace information may be processed to produce the requested output.

Users should avoid entering unnecessary personal information into AI prompts or free-text fields. Axario seeks to limit the information supplied to AI service providers to what is reasonably necessary for the relevant functionality.

Axario has disabled the Lovable setting that permits information from Axario's AI features to be used by Lovable for application debugging or service improvement.

Axario does not make decisions that produce legal consequences or similarly significant effects on individuals solely through automated processing without appropriate human involvement. Where AI-assisted functionality is used, human oversight remains responsible for reviewing and acting upon the output generated by such systems.

11. Access to Personal Information

Access to information within Axario is controlled according to the relevant account or platform role.

For Axario Home, household members may have different access rights according to their assigned role.

Axario's website states that household records are scoped to the relevant household and access is restricted to invited members according to their assigned permissions.

Sensitive fields may be subject to more restrictive access controls than ordinary household information.

For Axario Business, access is controlled according to workspace roles and permissions, including role-based and module-level access controls.

12. Operators, Service Providers and Third Parties

Axario may use third-party service providers, operators and platforms to provide, operate, secure and support its website, applications and related services.

Depending on the services and features used, these providers may assist with:

- cloud hosting and infrastructure;
- database and file storage;
- platform development and technical support;
- email delivery and service communications;
- push notifications;
- authentication and sign-in services;
- artificial intelligence processing;
- transcription or image processing;
- payment and subscription processing;
- mapping, geocoding and route-related functionality;
- calendar integration;
- website analytics, marketing and campaign measurement; and
- sharing or communication functionality initiated by users.

Service providers and third-party platforms used by Axario, depending on the services and features enabled, may include:

- Supabase and related AWS infrastructure;
- Lovable Labs Incorporated ("Lovable");
- Google, including Google Maps, Geocoding and Routes services, where applicable;
- Google Gemini;
- OpenAI;
- Firebase;
- Google Calendar;
- Google Analytics;
- Meta, including Meta Pixel;
- LinkedIn, including LinkedIn Insight Tag;
- Paystack, for payment processing in South African Rand;
- Paddle, for international payment and subscription processing;
- Google Play Billing, for applicable in-app purchases and subscription payments;
- Apple, including Sign in with Apple for Axario Home;
- Microsoft, including Microsoft sign-in for Axario Business;
- WhatsApp, where an Axario Business user chooses to use WhatsApp sharing functionality; and
- other service providers used to operate and support Axario.

Email Delivery and Service Communications

Axario currently uses Lovable's email-delivery functionality to send certain automated service and transactional emails generated through the Axario marketing website, Axario Home and Axario Business, using Axario's own sender domain. These communications do not include newsletters, bulk marketing campaigns or subscriber-list marketing emails.

These communications may include website contact and demonstration-request notifications and confirmations, Axario Home welcome and reminder emails and internal system or error notifications, and Axario Business service communications, including welcome emails.

Depending on the communication concerned, information processed for email delivery may include the recipient's email address, name, company or organisation details, contact details, the type or subject

of the enquiry or communication, and information contained in the relevant message or form submission.

Where an Axario Home user enables an email reminder, the information processed for delivery may include the recipient's email address, the reminder title and any free-text reminder content entered by the user. Free-text content may contain Personal Information or Special Personal Information depending on what the user chooses to enter.

Internal system or error notifications may also be sent to authorised Axario administrative or alert addresses for operational, security, troubleshooting and service-management purposes.

Sign-up confirmation, authentication and password-reset communications are separate from the Lovable email-delivery functionality described above and are processed through the applicable authentication or hosting service. The underlying delivery provider may depend on the authentication method and platform concerned.

Where an Axario Business user chooses to send an email or WhatsApp message using functionality that opens the user's own email application or WhatsApp with a pre-filled message, the communication is sent through the service selected or used by that user rather than through Axario's email-delivery provider. Axario may retain a record or copy of the communication within Axario Business where this forms part of the applicable functionality or business record.

The particular information processed by a service provider or third-party platform will depend on the service or feature concerned. Axario seeks to limit the Personal Information disclosed to service providers to information reasonably necessary for the relevant service or processing purpose.

Where a service provider processes Personal Information on Axario's behalf as an Operator, Axario will take reasonable steps to assess the provider's privacy and security measures and to ensure that appropriate confidentiality, security and contractual safeguards are implemented where required by POPIA and other applicable law.

Some third-party providers may process Personal Information for their own purposes or may act as independent Responsible Parties in relation to particular services. Where applicable, their processing will also be subject to their own privacy terms and legal obligations.

Axario does not sell Personal Information to third parties.

13. Operator and Data Processing Arrangements

Where Axario acts as an Operator on behalf of an Axario Business customer or another Responsible Party, Axario will enter into an appropriate written Operator Agreement, Data Processing Agreement or equivalent written contractual arrangement, as required by POPIA, where required, setting out the applicable processing, confidentiality and security obligations.

Where Axario acts as the Responsible Party and appoints an operator or service provider to process personal information on its behalf, Axario will take reasonable steps to assess the provider's privacy and security measures and to implement appropriate the written contractual and security safeguards required under POPIA.

14. Cross-Border Processing

Some of Axario's service providers may store or process personal information in data centres located outside South Africa.

Where personal information is transferred outside South Africa, Axario will seek to ensure that the transfer complies with **section 72 of POPIA**, including by relying on appropriate legal, contractual or other safeguards where required.

The countries and safeguards applicable to certain service providers may change from time to time as Axario's service providers and infrastructure change.

15. Security of Personal Information

Axario implements reasonable technical and organisational safeguards appropriate to the nature of the information processed.

These safeguards may include:

- HTTPS/TLS encryption in transit;
- encryption of stored data through applicable infrastructure providers;
- role-based access controls;
- authentication controls;
- household and workspace data separation;
- server-side access restrictions;
- database-level security controls;
- audit and access logging;
- restricted administrative access;
- secure cloud storage; and
- security monitoring and incident-response processes.

No electronic system can be guaranteed to be completely secure. Axario will nevertheless take reasonable measures to safeguard personal information and review its security controls as risks and technology change.

16. Retention of Personal Information

Axario will not retain Personal Information for longer than is necessary to achieve the purpose for which it was collected or subsequently processed, unless:

- retention is required or authorised by law;
- Axario reasonably requires the information for lawful purposes related to its functions or activities;
- retention is required by an agreement; or
- the Data Subject has consented to longer retention where consent is applicable.

Different retention periods may apply to different categories of Personal Information, having regard to the purpose of the processing, applicable legal or contractual requirements and Axario's legitimate operational, security and compliance requirements.

Where Personal Information is no longer required for an authorised purpose, Axario will delete, destroy or, where appropriate, de-identify the information in accordance with its applicable retention and deletion processes.

Where information has been de-identified so that it can no longer reasonably be associated with an identifiable Data Subject, Axario may retain and use the resulting anonymous information for statistical, analytical, service-performance or product-improvement purposes, subject to Axario's applicable retention practices.

16.1 Axario Home Usage and Error Information

Identifiable Axario Home usage events are retained for 90 days.

After this period, usage information required for longer-term service-performance, product-improvement and trend analysis may be converted into anonymous aggregated daily statistics, after which the underlying identifiable usage records are deleted.

The aggregation process removes information that could directly associate the statistics with a particular user or household and applies additional measures to reduce the risk of re-identification. Anonymous aggregated usage statistics may be retained for up to 24 months.

Detailed Axario Home error-event information is retained for 90 days and is thereafter deleted.

16.2 Campaign and Referral Attribution Information

The axario_attr cookie used on the Axario marketing website has a maximum duration of 90 days, as described in Axario's Cookie Policy.

Where campaign or referral attribution information has been associated with an Axario user account following sign-up, it may be retained as part of the relevant account and marketing attribution records for as long as reasonably necessary for campaign measurement, attribution and related business purposes, subject to Axario's general retention principles and applicable data subject rights.

16.3 Website Enquiries and Communications

Personal Information submitted through website contact, enquiry or demonstration-request forms is retained for a minimum of 12 months from the last meaningful interaction. After that period, the information becomes eligible for review and deletion in accordance with Axario's retention and deletion process. Records are not automatically deleted when the 12-month period expires.

Where the same person subsequently interacts with Axario in relation to the enquiry, the date of the last meaningful interaction is updated and the retention period is calculated from that date.

Where the person becomes an Axario customer or an ongoing business relationship is established, information that remains necessary for that relationship may be retained as part of the relevant customer or business records. Information that is no longer necessary for that purpose will not be retained solely because the person became a customer.

A record may be retained for longer where reasonably necessary for an unresolved complaint, dispute, security matter, legal requirement or other lawful retention purpose.

Operational website email-delivery records are retained for a minimum of 12 months from the relevant communication or delivery event. After that period, the records become eligible for review and deletion

in accordance with Axario's retention and deletion process. Records are not automatically deleted when the 12-month period expires.

Records maintained to give effect to a person's objection to direct marketing or decision to unsubscribe may be retained for as long as reasonably necessary to ensure that the person's marketing preference continues to be honoured.

Information associated with an unsubscribe mechanism, including an email address and associated unsubscribe token, may be retained for as long as reasonably necessary to operate the relevant unsubscribe mechanism and give effect to the person's marketing preference.

16.4 Other Axario Records

Operational email-delivery records for Axario Home and Axario Business are retained for a minimum of 12 months from the relevant communication or delivery event. After that period, the records become eligible for review and deletion in accordance with Axario's retention and deletion process. Records are not automatically deleted when the 12-month period expires. A record may be retained for longer where reasonably necessary for an unresolved complaint, dispute, security matter, legal requirement or other lawful retention purpose.

Where an Axario Home welcome-email record is maintained for the purpose of preventing duplicate welcome emails, that record may be retained for as long as the relevant account exists and deleted when the account is permanently deleted, subject to any applicable backup retention period or other lawful retention requirement.

Copies or records of emails and WhatsApp messages sent by Axario Business users and retained within the applicable workspace may form part of the customer's operational or business records. These records are not subject to the 12-month retention process applicable to operational email-delivery records and may be retained for as long as the relevant workspace or customer account remains active, subject to any applicable legal or contractual retention requirements. Where the relevant workspace or account is permanently purged, these records are deleted in accordance with Axario's applicable account-deletion and backup processes unless continued retention is required or permitted for a lawful purpose.

Certain records, including billing, audit, security, compliance or legal records, may be retained after an account, household, workspace or individual record has been deleted where continued retention is required or permitted for lawful purposes.

Backup systems may temporarily retain deleted information until the applicable backup cycle expires, after which the information is deleted or overwritten in accordance with Axario's backup processes.

Location coordinates recorded in connection with asset scans, asset photographs or bulk asset movements form part of the relevant asset history and may be retained for the life of the applicable workspace. They are deleted when the workspace and its associated records are permanently purged, subject to any applicable backup retention period.

Records created by users for household, expense, insurance, property, asset-management or other operational purposes may be retained for as long as the relevant household or workspace remains active, subject to applicable user deletion functionality and any legal or contractual retention requirements.

17. Correction and Deletion

Users may, subject to their role and permissions:

- update or correct information;
- delete certain records;
- request correction of inaccurate information; or
- request deletion where permitted by law.

Axario may be required to retain certain records despite a deletion request where retention is required or permitted by law.

Where Axario acts as an Operator, a request relating to information controlled by an Axario Business customer may need to be referred to that customer as the Responsible Party.

18. Data Subject Rights

Subject to POPIA and any applicable limitations, data subjects may have the right to:

- request confirmation of whether Axario holds personal information about them;
- request access to their personal information;
- request correction or deletion of inaccurate, irrelevant, excessive, outdated or unlawfully obtained information;
- object to certain processing;
- withdraw consent where processing is based on consent;
- object to direct marketing; and
- lodge a complaint with the Information Regulator.

Data subjects may exercise their rights by submitting a written request to the Information Officer. Axario may require proof of identity before processing a request. Requests will be handled within the timeframes prescribed by applicable law.

Requests for access, correction or deletion of personal information may be submitted using the applicable Information Regulator forms where required.

19. Direct Marketing

Axario may send direct marketing communications only where permitted under applicable law.

Recipients may opt out of electronic direct marketing at any time using the unsubscribe mechanism provided in the communication or by contacting Axario.

Axario will maintain appropriate records of objections and opt-out requests and will take reasonable steps to ensure that such requests are actioned.

Information necessary to record and honour an objection or opt-out may be retained for as long as reasonably necessary to ensure that the person does not receive further direct marketing contrary to their stated preference.

20. Cookies and Similar Technologies

Axario uses strictly necessary cookies and similar technologies for purposes such as:

- authentication;
- session management;
- security;
- user preferences;
- recording and respecting cookie-consent choices; and
- essential platform functionality.

Axario uses a first-party consent cookie (axario_consent) to record the visitor's cookie choice as “granted” or “denied”. This cookie is used to remember and apply the visitor's consent preference and may remain on the visitor's device for up to 12 months.

The Axario marketing website also uses non-essential cookies and similar technologies for website analytics, marketing, advertising, campaign measurement and campaign and referral attribution.

These technologies may include Google Analytics 4, Meta Pixel, LinkedIn Insight Tag and Axario's first-party campaign and referral attribution cookie (axario_attr). Google Tag Manager is used to manage and deploy applicable tags, and Google Consent Mode v2 is used to manage applicable Google consent signals.

The axario_attr cookie is used to record campaign and referral attribution information and is set only after the visitor has provided the applicable consent. It may remain on the visitor's device for up to 90 days.

Non-essential analytics, advertising, marketing and attribution technologies are activated only after the user has provided the applicable consent through Axario's cookie consent mechanism.

Users may select “Accept” or “Decline” and may subsequently change or withdraw their consent at any time through the **Cookie Settings** control available on the Axario website.

Where the applicable consent is declined or subsequently withdrawn, applicable non-essential tracking is stopped and the relevant non-essential cookies and similar technologies are not activated or are removed or disabled, as applicable. Further collection and transfer of campaign and referral attribution information through the applicable non-essential technologies is also stopped.

The axario_consent cookie may remain in place after a visitor declines or withdraws consent because it is used to record and respect the visitor's cookie preference and to prevent non-essential technologies from being activated contrary to that preference.

Where campaign or referral information has already been associated with an Axario account, that information is processed and retained in accordance with this Privacy Policy, including the retention provisions in Section 16.

Users may also manage cookies through their browser or device settings. Disabling strictly necessary cookies may affect the operation of certain website or application functionality.

Website fonts and video thumbnail images used by Axario are served from Axario-controlled resources and are not loaded from the relevant third-party provider when the webpage is displayed. Where a user chooses to play or access third-party video content, the relevant third-party service may

then be contacted and information may be processed in accordance with that provider's applicable privacy and cookie practices.

Further information regarding the cookies and similar technologies used by Axario, including their purposes and durations, is available in Axario's separate **Cookie Policy**.

21. Integrations and Third-Party Services

Users may choose to connect Axario with third-party services, such as Google Calendar or other supported integrations.

Where a user enables such an integration, information necessary to provide that functionality may be transmitted to or received from the relevant third-party provider.

Third-party services operate under their own terms and privacy practices. Users should review the relevant third-party privacy policies before enabling optional integrations.

22. Security Compromises

Where Axario has reasonable grounds to believe that personal information for which it is the Responsible Party has been accessed or acquired by an unauthorised person, Axario will manage the incident in accordance with POPIA and its **Data Breach Management Policy**.

Where Axario acts as an Operator, Axario will notify the relevant Responsible Party as required under POPIA.

23. Third-Party Links

Axario's website may contain links to websites or services operated by third parties.

Axario is not responsible for the privacy practices or content of third-party websites that are not under Axario's control.

24. Changes to this Privacy Policy

Axario may update this Privacy Policy from time to time to reflect:

- changes to the Axario website or applications;
- new functionality or integrations;
- changes in service providers;
- changes in legal or regulatory requirements; or
- changes to Axario's processing activities.

The updated Policy will be published on the Axario website with the revised effective or last-updated date.

25. Contact Axario

Questions, requests or complaints relating to personal information may be directed to:

Praxis Marketing Consultancy (Pty) Ltd t/a Axario

44 Old Kent Drive
Midstream Estate
Olifantsfontein
Gauteng
1692
South Africa

Email: ask@axario.co.za

Website: www.axario.co.za

26. Information Officer Details

Information Officer

Name: Tanya Butler

Email: tanya@axario.co.za

Telephone: +27 61 509 4992

Requests or enquiries relating to personal information, privacy rights or POPIA may be directed to the Information Officer using the above details.

27. Complaints to the Information Regulator

A data subject who is dissatisfied with how Axario has handled their personal information may lodge a complaint with the **Information Regulator of South Africa**.

The Information Regulator's current contact and complaint details are available from its official website.