



NEURO THESIS

PRIVACY POLICY

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1. INTRODUCTION

This Privacy Policy constitutes a part of the Neuro Thesis’s terms of use. The terms used in this Privacy Policy shall have the same meanings as in the Terms and Conditions (T’s & C’s) except as otherwise provided herein.

This Privacy Policy explains how Neuro Thesis collects, uses, processes, discloses, shares, transfers, and protects personal information obtained through Neuro Thesis’ websites, events, seminars, retreats, and/or workshops. The terms “we,” “us,” and “our” refers to Neuro Thesis (Pty) Ltd. When we ask for certain personal information from users, it is because we are required by applicable laws or government orders to collect such information or because it is relevant for our specified purposes and provision of our services.

Please carefully read the full content of this Privacy Policy. When visiting any one of the Websites, or making use of any other Neuro Thesis Services and Platform(s), regardless of



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whether or not you register for a www.neurothesis.com / www.brinntomes.com / www.famologi.com / www.dadologi.com / www.momologi.com / kidology.com Account, you acknowledge, understand, and consent to all clauses described in this Privacy Policy. We will not use your personal information for any purpose not covered in this Privacy Policy or the T's & C's without prior notification to you and your consent. We will not share your personal information without your consent or for any other purpose not covered by this Policy.

The latest Privacy Policy has incorporated elements from the Protection of Personal Information Act 4 of 2013 ("POPI" or "POPIA") as we act in accordance with its personal information processing rules within South Africa. Compliance with POPIA aligns us with European standards according to the provisions of the General Data Protection Regulation (GDPR).

2. DEFINITIONS

- 2.1. **"Account/ Neuro Thesis Account"** means a User's Neuro Thesis Account created on any one of the Platforms.
- 2.2. **"Neuro Thesis" or "the Company"** means "Neuro Thesis Pty (Ltd)" a private company incorporated in terms of the laws of the Republic of South Africa, with registration number 2022/574462/07 and registered address at 42 Keerom Street, Cape Town South Africa.
- 2.3. **"Personal Information"** means personal information as defined in the Protection of Personal Information Act 4 of 2013, including (but not limited to) information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.



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- 2.4. **“Platform”** means the Website, any email addresses associated to the Website, and/or any other platform associated with the provision of the Services by Neuro Thesis.
- 2.5. **“Processing”** means the processing of information as defined in POPIA.
- 2.6. **“POPI”** or **“POPIA”** means the Protection of Personal Information Act 4 of 2013 and regulations published in terms thereof.
- 2.7. **“Services”** means the provision of the Products and Content by Neuro Thesis to you as defined in the terms and conditions.
- 2.8. **“Third-party Applications”** means applications and websites by third-party service providers that Neuro Thesis uses in order to deliver services and products to its clients.
- 2.9. **“User Data”** means data inputted by you, or by us on your behalf, for the purposes of using the Services or facilitating your use of the services, which may include your Personal Information. User Data may include, but is not limited to, your name, address, email address, and other information provided by you in respect of receiving the Services.
- 2.10. **“Website”** means www.neurothesis.com / brinntomes.com / www.famologi.com / www.dadologi.com / www.momologi.com / www.kidologi.com or any other URL owned or controlled by Neuro Thesis that connects it to the public.

3. CONSENT

- 3.1. By creating a Neuro Thesis Account and/or using any of the Platforms and/or Services, the use of any contact submission form, client questionnaire, and any email correspondence with Neuro Thesis, you consent to our processing of your Personal Information and User Data as may be required for the provision of the Services, including but not limited to the manner described in the below clauses.
- 3.2. By creating a Neuro Thesis Account, you agree to be bound by the provisions of the terms of use.
- 3.3. In administering the Services, we may store your Personal Information and User Data outside of South Africa, which you hereby consent to. In so doing, we will take all reasonable steps to ensure your Personal Information and User Data is afforded the same security according to South African standards.
- 3.4. We make use of third-party service providers for the provision of the Services. By using the Services you consent to the sharing of your personal information with these service providers.
- 3.5. Should you wish to withdraw your consent, you may do so at any time by notifying us and deregistering for our Services, and you may contact us at support@neurothesis.com . Please note that we may not be able to provide the Services should you withdraw your consent for our processing of your personal information and your Neuro Thesis Account may be deregistered from the Platform, or Neuro Thesis may otherwise take steps to terminate its relationship with you.

4. INFORMATION WE COLLECT

We will keep all information collected by us from you in the provision of the Services confidential and will not share it with third-parties without your consent.

The followings are the types of information we may collect when you make use of the Services:

4.1. Information You Provide to Us

4.1.1. When you create a Neuro Thesis Account and use our Services, you provide us with the following information and consent to our processing of this information:

- a) Your name and surname;
- b) Your email address/es;
- c) Your address (for shipping purposes, if applicable);
- d) Your phone number;
- e) Your date of birth;

and other information which may be required by us depending on the Product selected by you, these may include highly personal details relating to your occupation, parenting style, medical information belief system and family life as provided for in the client questionnaire or otherwise.

4.2. Information We Collect as You Access the Services

4.2.1. Service Usage Information



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We may monitor and collect tracking information related to usage including but not limited to your phone number, access date and time, device type and device identification, operating system and hardware setting, browser type, and information derived from SIM card, network operator, IP address, GPS, base station, and WLAN (“Service Usage Information”). This information may be directly obtained by Neuro Thesis or through third-party service providers. The collection of Service Usage Information helps our systems to ensure that our interface is accessible for users across all platforms.

4.2.2. Transaction Information

In the case where the Platform facilitates the creation of User operated accounts, we may collect transaction information as you use the Services, including but not limited to deposit snapshots, account balances, trade history (such as transaction initiation, payment method, price, quantity, time, and authorization information), order activity, and distribution history (“Transaction Information”). We collect such transaction information to monitor suspicious activity for improvement of provision of the Services, user fraud protection, legal case resolution, and any other purposes disclosed in this Privacy Policy.

4.2.3. Communication Information

You agree that, for the purposes disclosed in this Privacy Policy, we are entitled to collect and use the information contained in or related to the communication that you send to us or generated through your use of the Services (“Communication Information”), which includes:



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- a) all messages, requests or other information you send in the course of your contact with Neuro Thesis;
- b) all communications and file attachments in connection with your transactions with Neuro Thesis or other data generated primarily through your communications with us.

4.2.4. Financial Information

We may retain information from you relating to your purchases and transactions on the Platform. We will do so where necessary for the provision of the Services which includes, but is not limited to, bank account information and order history. We will not store other payment information. Where we make use of third-party payment service providers, you may be required to provide financial information to them which will be governed in accordance with those third parties' policies. We will not disclose your financial information to third parties.

5. HOW WE COLLECT INFORMATION

5.1. Information Neuro Thesis Automatically Collects

Most of the personal information that we collect is directly provided by you. In the following situations, we will collect and process the information about you:

- a) where you register for or log in to your Neuro Thesis Account, if applicable, or visit the Website, or use Neuro Thesis Services;



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- b) where you voluntarily complete any user survey or provide feedback to us via email or any other channel;
- c) where you use cookies of the browser or software in visiting or using our Website or apps;
- d) other situations where we may automatically collect your information as mentioned in this Privacy Policy or our T'S & C'S.

5.2. Information Collected from the Third-party Sources

We may collect information about you from third-party sources, including but not limited to, the following channels:

- a) marketing partners and resellers;
- b) advertising partners and analytics providers.

5.3. Anonymized and Aggregated Data

Anonymization is a data processing technique that removes or modifies personal information so that it cannot be associated with a specific individual – the data is 'de-identified' from the individual it belongs to.

We may use anonymized or aggregate customer data for any business purpose, including to better understand Users' needs and behaviours, improve our products and services, conduct business intelligence and marketing, and detect security threats. We may perform our own analytics on anonymized data or enable analytics provided by third parties.

6. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about you for the following purposes or in the following ways:

6.1. To Provide and Maintain Neuro Thesis Services

We use the information collected to deliver, maintain, and provide better Neuro Thesis Services.

We may disclose your information to third-party service providers for the purpose of the improvement and provision of the Services. This may include third-party contractors, cloud computing infrastructure providers, analytical, third-party applications and cyber security service providers.

6.2. To Protect Our Users

We use the information collected to protect our platforms, Users' Accounts (where applicable), and archives.

We use IP addresses and cookies to protect against automated abuse such as spam, phishing, and Distributed Denial of Service (DDoS) attacks.

6.3. To Comply with Legal and Regulatory Requirements

With respect to the privacy and security of personal information, we may disclose your personal information in compliance with our legal obligations, government requests, and reasonable user-generated inquiries. Except for the situations



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stated in this Privacy Policy or the T's & C's, we will not disclose or provide any of your personal information to third parties without obtaining prior consent from the User.

6.4. For Measurement, Research and Development Purposes

We may analyse statistical trends in your use of the Services to improve the operation of the Services. Any personal information analysed in this manner will be anonymised.

We continuously monitor activity information within our systems and our communications with users to look for and quickly fix problems.

6.5. To Communicate with You

We use personal information collected, including your phone number or email address to interact with you directly when providing the Services and customer support or to keep you informed on logins, transactions, account security and other aspects. All direct communications are properly kept at Neuro Thesis or the service provider designated by Neuro Thesis, to be reviewed for accuracy, retained for legal purposes, or to be used to perform other statutory or contractual obligations.

6.6. To Enforce Our T's & C's and Other Agreements

6.6.1. The collected information may be used to enforce our T's & C's , and other agreements, with our Users.



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6.6.2. This includes, but is not limited to, reviewing, investigating, and preventing any potentially prohibited or illegal activities that may violate the foregoing provisions, or disclose the relevant information to a third party in accordance with Neuro Thesis's legal obligations.

6.6.3. Neuro Thesis reserves the right to suspend or terminate the Account of any User found to be engaged in activities that violate our T'S & C'S and other agreements with our Users.

6.7. For Marketing and Advertising

We may share anonymised personal information with our marketing partners, or on our Platforms, for the purposes of targeting, modelling, and/or analytics as well as marketing and advertising. We will not disclose your personal information or user data to third parties for the purposes of direct marketing.

6.8. Other Purposes

We may disclose your personal information for other purposes from time to time, which purposes we will obtain your explicit consent for and for which we will provide full details.

7. MARKETING

We endeavour to keep our users up to date on the latest Neuro Thesis Products and Services. We provide all our users with the option to unsubscribe from any marketing or promotional material by clicking the unsubscribe link at the bottom of our marketing communications.

8. ADVERTISING

You give the Company the express permission for the collection, collation, processing or disclosure of any of your personal information and user data for the specific purpose of creating advertising material.

The Company will notify you that it intends to use your personal information or user data before using the same.

Should the Company require the personal information and user data for any other purpose than the disclosed purpose it will attain your express permission, unless permitted or required to do so by law.

The Company undertakes to, for as long as the personal information and user data is used and for a period of at least one year thereafter, keep a record of the personal information and the specific purpose for which the personal information was collected.

You give the Company the permission to disclose your personal information and user data to third parties, who access the Platform, for advertising purposes.

The company undertakes to, for as long as the personal information and user data is used and for a period of at least one year thereafter, keep a record of any third party to whom the personal information and user data was disclosed and of the date on which and the purpose for which it was disclosed.

The company undertakes to delete or destroy all personal information which has become obsolete.

9. HOW WE STORE AND PROTECT USER DATA



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Neuro Thesis keeps personal information safe using reasonable security measures and has implemented several security measures to ensure that your information is not lost, abused, or altered, including, but not limited to:

9.1. Physical Measures

Materials containing your personal information will be stored in a locked place.

9.2. Electronic Measures

Computer data containing your personal information will be stored in the computer systems and storage media that are subject to strict log-in restrictions.

9.3. Management Measures

Only authorized employees are permitted to access your personal information for the purposes described in this Privacy Policy. Such employees must comply with our internal confidentiality rules for personal data. We have also imposed strict physical access controls personal information.

9.4. Technical Measures

We use various currently available general security technologies and supporting management systems to minimize the risks that your information may be disclosed, damaged, misused, accessed without authorisation, disclosed without authorisation, or altered.

10. DISCLAIMER & USER OBLIGATIONS



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- 10.1. While we will take all reasonable steps to ensure the security of your User Data and Personal Information according to industry standards, it is not possible to guarantee the complete security of all information provided at all times.
- 10.2. We will notify you as soon as reasonably practicable of any breach of security, loss of or damage to your User Data or Personal Information.
- 10.3. Users are responsible for taking reasonable precautions to safeguard their Personal Information.
- 10.4. Although we endeavour to ensure your information is as correct as possible, you are responsible for notifying us of any changes to your User Data or Personal Information as reflected on your customer profile, account, or any statements in respect of the Services.
- 10.5. The Company will not be held liable for any losses of any nature which are due to incorrect User Data or Personal Information provided by users in respect of the Service.
- 10.6. The Company will not be held liable for any loss or damage arising from a security breach or disclosure of your Personal Information or User Data, to the maximum extent permitted by law.
- 10.7. The Company shall not be liable for any damage or interruptions caused by any computer viruses or other malicious code that may affect your computer or other equipment, or any phishing, spoofing or other attack. Neuro Thesis advises the regular use of a reputable and readily available virus screening and prevention software. You should also be aware that SMS and email services are vulnerable to spoofing and phishing attacks and should use care in reviewing messages purporting to originate from Neuro Thesis. The Company will not be held liable



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should you disclose any of your personal information or your information relating to the Services to a third-party.

- 10.8. You will notify Neuro Thesis immediately at support@neurothesis.com if you are aware of any unauthorised use of your Neuro Thesis Account or your email address by any person or any other violations to the security of the Website.
- 10.9. We will notify you as soon as reasonably practicable of any breach of security, loss of or damage to your User Data or Personal Information.
- 10.10. If you suspect that your personal information has been compromised, especially account and/or password information, please immediately contact Neuro Thesis Customer Support team at support@neurothesis.com.
- 10.11. It is your responsibility to maintain and manage your account and to take your own reasonable measures to protect your account.

11. RECORD RETENTION

Unless otherwise stipulated by law or the T'S & C'S, we may retain your records for a period of five years after closure of your Neuro Thesis Account. After this period, we will destroy or anonymise your personal information and may retain it for statistical purposes.

12. TRANSFERS OF PERSONAL INFORMATION

We may transfer your personal information to other countries or regions than South Africa, which you consent to, for storage or analytical purposes and may enlist the services of third-party operators to provide storage services. Any regions where we store your data will be subject to the same standards as prescribed by POPI, in their local jurisdictions. Any third-party operators will treat your User Data and Personal Information as confidential and will be bound by substantially the same industry security standards as we are.

13. COOKIES

13.1. What Are Cookies?

Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive to collect standard internet log information and visitor behaviour information. When you visit Neuro Thesis, we can automatically collect information from you through cookies or similar technologies.

13.2. How Do We Use Cookies?

We use cookies in a range of ways to make your experience on our Platforms more enjoyable, including but not limited to:

- a) to keep you signed in (where applicable);
- b) to record your habits and preferences when browsing Neuro Thesis;
- c) to record our performance and verify the effectiveness of online advertising through Google Stats with cookies.

13.3. What Types of Cookies Do We Use?

We use different types of cookies, including:

- a) Functional Cookies

We use such cookies to help us identify you and remember your previous preferences and settings, which may include your device, your operating system,



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your preferred language, your location, and other session data. We use a mix of first-party and third-party cookies.

b) Marketing Cookies

We use these cookies to collect information about your visit to Neuro Thesis, the content you view, the links you follow, and other information about your browsers, devices, your IP addresses, and referral URLs.

13.4. How to Manage Cookies?

Most browsers are pre-set to accept cookies. You can adjust your browser setting to prevent cookies or to notify you as soon as cookies are loaded. However, stopping all cookies might mean that you cannot access or use some features of the Neuro Thesis.

14. YOUR DATA PROTECTION RIGHTS

We hope to ensure that you are fully aware of the data protection rights that you enjoy. Unless otherwise required by law or government orders, each User has the following rights:

14.1. Right of Access

You have the right to access or obtain copies of your personal information. We may charge a reasonable fee for providing the access service. You have the right to be notified where your information is collected in the first place.

14.2. Right to Rectification & Notification

You have the right to correct your personal information that you deem inaccurate. You also have the right to ask us to complete the personal information that you deem incomplete within a reasonable limit.

You have the right to be notified if there is a breach of access to your personal information.

14.3. Right to Erasure (Right to be Forgotten)

You have the right to request the erasure of your personal data under certain circumstances.

14.4. Right against Direct Marketing

You have the right, under certain circumstances, to not be subject to direct marketing.

14.5. Right to Restriction of Processing

Under certain circumstances as required by law you have the right to request us to restrict the processing of your personal information; however, you understand that such restriction of the processing may prevent your Neuro Thesis Account from being verified and prevent us from providing you with the Services.

14.6. Right to Object

Under certain circumstances as required by law you have the right to object to the processing of your personal information; however, you understand that such



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objection of the processing may prevent your Neuro Thesis Account from being verified and prevent us from providing you with some the Service. If you are unsatisfied with the resolution of any objection, you may consult the Information Regulator at complaints.IR@justice.gov.za.

15. PRIVACY POLICIES OF OTHER WEBSITES

15.1. Privacy Policies of Other Websites

If you visit other third-party platforms or partner's websites, apps via the links on Neuro Thesis, you should agree with and abide by their separate and independent privacy policies. We are not responsible for the content or the activities therein.

15.2. Privacy Policies of Neuro Thesis

This Privacy Policy applies to all platforms, websites, and departments of the Website and Neuro Thesis ecosystem.

16. CHANGES TO THIS PRIVACY POLICY

From time to time, Neuro Thesis may revise this Privacy Policy to reflect changes in Law or our personal-data collection, processing, and use practices. Changes to this Privacy Policy will be announced by posting on the Website and/or by direct notification to users. Should you not agree with the revised content of any updated Privacy Policy, you may exercise the option to de-register for Neuro Thesis services. When an updated version of the Privacy Policy is released, your continued access to Neuro Thesis means that you agree to the updated content and agree to abide by the updated Privacy Policy.



17. DISPUTE RESOLUTION

Any disputes in terms of this Privacy Policy will be dealt with, as far as permitted by law, in terms of the Dispute Resolution clause of the Terms and Conditions.

18. CONTACT US

We are committed to respecting the freedoms and rights of all our Neuro Thesis Users. Should have any questions or concerns regarding this Privacy Policy, or if you would like to file a data protection request, please contact us at support@neurothesis.com .