

Crowdaxe Capital (Private) Limited, is a company duly incorporated in Zimbabwe under company number 42880A0452025. For the purpose of data protection laws, we are the controller, and are responsible for your personal data (collectively referred to as "Crowdaxe", "we", "us" or "our" in this privacy notice).

Crowdaxe respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), and tell you about your privacy rights and how the law protects you.

This privacy notice forms part of our terms of business, but is not intended to override them. This policy may be amended or updated from time to time and revised versions will be shown on our website. It is your responsibility to check for the most recent version of this notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Crowdaxe collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or purchase a product or service from us.

It is important that you read this privacy notice together with any other policy or notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data.

For the avoidance of doubt, this website is not intended for children under the age of 18 years old. We do not knowingly collect data relating to such individuals.

Contact details

If you have any questions about this privacy notice or our privacy practices, please contact our DPO by writing to us at the following address:

Crowdaxe Capital (Private) Limited
Hive 25 – 25 Shortheath Road
Chisipite
Harare, Zimbabwe
You can also contact us by emailing legal@Crowdaxe.com.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or their handling of your data. When you leave our website, we encourage you to read the privacy notice of the websites you visit.

2. The data we collect about you

Personal data, or personal information, refers to any information about an individual from which that person can be identified (personal data). It does not include data where the identity has been removed to the extent that it cannot be reconstructed to identify an individual (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you that we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender. This could include photographs or forms of identification and proof of address.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** (which may include bank account details).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your transactions, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect personal data about you from publicly available sources for the purposes of completing our anti-money laundering and know-your-client checks that we are required to carry out as a regulated financial services firm.

We also collect, use and share Aggregated Data (such as statistical or demographic data) for any purpose. Aggregated Data could be derived from your personal data, but is not considered personal data in law, as this data will **not** directly or indirectly reveal your identity.

We do not collect any special categories of personal data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel or suspend our services.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us. This includes personal data you provide when you:
 - create an account on our website;
 - use our services;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or

- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, such as other users of our website/services or advertising networks, and public sources.

4. Lawful basis for processing

We only process your data (which may include providing it to a third party) where we have identified a valid lawful basis to do so. The valid lawful basis we rely on are as follows:

- **Contractual obligation** – Where processing is necessary to comply with our obligations arising out of a contract, for example, taking payment.
- **Legitimate Interest** – Where we use legitimate interests we will record our decision on making this decision. We rely on legitimate interest where processing of the data we hold on you does not, in our opinion, affect your rights or freedoms and is proportionate to our interests e.g. obtaining your feedback on our service.
- **Consent** – We will seek to obtain your consent to process your personal data outside our contractual obligations (see above) unless we have identified a Legitimate Interest (see above).

5. How we use your personal data

We will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This will include sharing your personal data with companies you have registered an interest in investing in so that we can keep you up to date about their campaign.
- Where we need to comply with a legal obligation.
- Where you authorised us to do so.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact details	Performance of a contract with you
To process and deliver your transactions and services: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact details (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) providing a portal for the sharing of key documents (d) answering website user questions (including via a chatbot)	(a) Identity (b) Contact details (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to share key documents and information with you as a customer, provision of support to users of the website, and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact details (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) (c) Consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact details (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact details (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To share data analytics with investee companies to assist them with their marketing campaigns for investments via Crowdaxe	(a) Technical (b) Usage	Consent (where users have consented to advertising cookies)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact details (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing and Opting Out

Marketing investment opportunities is essential to our services. We will notify you of investment opportunities that we think will be of interest to you, based on the information you have provided to us (including your personal data). We seek to maximise the number of relevant investment opportunities shown to you, which is achieved by marketing these opportunities via digital marketing, such as email.

We have undertaken a data protection impact assessment in respect of our use of digital communications for marketing purposes, and have concluded that we have a legitimate interest in carrying out direct digital marketing to our members. The method is familiar to our members and is the least intrusive one available to us. We have considered that there is no adverse impact on individuals, as our communications are only sent to those who have provided their details for the purpose of becoming a member.

However, we strive to provide our members with choices regarding certain personal data uses, particularly around marketing. You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, we will still process your personal data provided to us as a result of your use of our website, our services or other transactions.

Copies of data protection impact assessments or legitimate interest assessments we have undertaken are available on request by using the contact details set out at the start of this policy.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out above.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We will keep your information within the organisation except where disclosure is required or permitted by law, or when we use third party service providers (data processors) to supply and support our services to you. Where we use third party processors, we have contracts in place with them. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Please see below the list which sets out the categories of recipients of personal data.

SERVICE PROVIDERS WHO MAY RECEIVE YOUR PERSONAL DATA

- IT Support Services
- Marketing Support Services
- Anti-money laundering Service Providers
- Email Providers
- Secure document disposal service
- Banks
- Payment Agents
- Government Agencies
- Online payment providers
- Accountants
- Legal Practitioners
- Advisors

If you have taken advantage of, or have applied to take advantage of, one of the investment opportunities we make available to members via our website, your personal data may also be shared with the relevant business or their professional representatives. Your personal data may also be

shared with any business that you contact directly. We have no responsibility or liability for how your personal data is handled by businesses you provide your data to via our website (or directly).

We may also share personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third-party marketing

We ask for express consent before we share your personal data with any third party for marketing purposes. For the avoidance of doubt, this does not include third parties who support us in providing direct marketing to you. Please see paragraph 9 below for more information on when we may share your personal data with third parties.

7. International Transfers

Your data is stored by us and our processors in Zimbabwe, UK, or in another country in accordance with the adequacy decisions granted by the Zimbabwe and UK governments or European Commission, or where the transfer has been completed via an appropriate transfer mechanism, such as standard contractual clauses.

8. Payments

Please refer to our terms and conditions of service for details of the payments we may take from you or process.

We use a third party payment providers to take payments from you.

9. Connected third party services

Where you have used a third party social media account to set up or login to your Crowdaxe account, we may receive data from, or share data with, those third party social media platforms. Their privacy notices will apply in addition to this privacy notice and shall take precedence in the event that their terms conflict with this notice.

Third party privacy notices will also apply in respect of integrated services which collect data, namely:

- [Google Additional Terms/Privacy Policy;](#)
- [Facebook Additional Terms/Privacy Policy;](#)
- [Linkedin Additional Terms/Privacy Policy;](#) and
- [Apple Additional Terms/Privacy Policy.](#)

10. Data Security

All information you provide to us via email or Our Site is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of Our Site, you are responsible for keeping this password confidential. We ask you not to share a password

with anyone. The security of your personal data is important to us. When you enter sensitive information (such as bank account information) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on Our Site, you can contact us at support@crowdaxe.com

Payment security

All payments made to Crowdaxe are processed by Stripe. Stripe conforms to the highest level of security - please see [here](#) for more details. Stripe has been audited by a PCI-certified auditor and is certified to PCI Service Provider Level 1. This is the most stringent level of certification available in the payments industry.

Security audits

We use recognised and accredited third parties to perform regular penetration tests of our platform and also internal networks across our offices. Any output is reviewed and prioritised with high importance.

Third party security

Like many businesses, we use certain third-parties to support the services we provide to our users. We constantly review the security and suitability of any third parties as part of our ongoing processes.

Staff training

Crowdaxe employees are required to undertake cybersecurity awareness training and also acknowledge that they will be compliant with internal security processes across hardware and software. These are reviewed and updated regularly.

11. Data Retention

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

Otherwise, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for more than six years in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at support@Crowdaxe.com.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

12. Your data protection rights

You have rights under data protection laws in relation to your personal data (though please note that your rights may be limited under certain circumstances). For example, you may have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it, as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the details provided at the start of the policy.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. Additional Information

Blog / Discussions

Our Site offers a publicly accessible blog and community discussions. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal data from our blog or community discussions, contact us at support@crowdaxe.com. In some cases, we may not be able to remove your personal data, in which case we will let you know if we are unable to do so and why.

Referrals

If you choose to use our referral service to tell a contact about Our Site, we will ask you for your contacts' name and email address. You must have consent from your contact to provide this information to us. We will automatically send your contact a one-time email inviting him or her to visit the site. Crowdaxe stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your contact may contact us at support@crowdaxe.com to request that we remove this information from our database.

Risk warning

Investing in private companies involves risks, including illiquidity, lack of dividends, loss of investment and dilution, and it should be done only as part of a diversified portfolio. Crowdaxe is targeted exclusively at investors who are sufficiently sophisticated to understand these risks and make their own investment decisions. You will only be able to invest via Crowdaxe once you are registered as sufficiently sophisticated. [Please click here to read the full Risk Warning.](#)

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details of historical performance, investors should be aware that past performance is not a reliable indicator of future results. Further restrictions and Crowdaxe's limitation of liability are set out in the Investor Terms.

Please seek independent advice as required as Crowdaxe does not give investment or tax advice.