NARACHI LEADERSHIP
Authentic Power | Courageous Leadership

PRIVACY POLICY

At Narachi Leadership[1] we adhere to the highest standards of protecting your personal data when we process it by virtue of your use of our website, **https://narachileadership.com/** (collectively, "**the Platform**"), by utilising our services, or by providing us with your personal data in any other way. As such, we have created this privacy policy for you to read and to understand how we safeguard your personal data and respect your privacy ("**Privacy Policy**").

Please ensure that you read all the provisions below, and our policies and guidelines which may apply from time to time, to understand all of your, and our, rights and duties.

1. Important Information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your personal data through any form of your engagement with us. This Privacy Policy complies with, and facilitates the obligations required from, the South African *Protection of Personal data Act, No. 4 of 2013* ("**POPIA**"), as amended, *Regulation (EU) 2016/679 (General Data Protection Regulation*) ("**GDPR**"), the Zimbabwe *Cyber and Data Protection Act No. 5 of 2021* (**CDPA***)* and any other applicable data protection laws.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing 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 personal data. This Privacy Policy supplements the other notices and is not intended to override them.

We do not process the data of minors nor special categories of personal data. Do not provide us with any such personal data, as it will constitute an immediate and automatic material breach of this Privacy Policy.

Controller and Processor

Narachi Leadership is the "**Controller**" and is responsible for your personal data when we decide the processing operations of your personal data. In some instances, we operate as a "**Processor**" of personal data on behalf of a Controller who use our services. In that case, that Controller's privacy policy will apply to your use of their services. We have appointed an information officer/ / Data Protection Officer (**DPO**) at Narachi Leadership who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our information officer using the details set out below.

Our Contact Details

- **Legal entity**: Narachi Leadership
- **Information Officer/DPO**: Rachel Nyaradzo Adams
- **Email address**: info@narachileadership.com

You have the right to make a complaint at any time to an appropriate supervisory authority including the South African **Information Regulator's Office** and the **Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)** or any other supervisory authority. We would, however, appreciate the chance to deal

[1] Narachi Leadership means: Narachi Leadership (Private) Limited, Zimbabwe and Narachi Leadership (Pty) Limited, South Africa.

with your concerns before you approach any such supervisory authority, so please contact us in the first instance.

Changes to this Privacy Policy

This Privacy Policy was last updated on 13 April 2026 and previous versions are archived and can be provided on request. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This Privacy Policy is subject to change without notice and is updated or amended from time to time and will be effective once we upload the amended version to the Platform. Your continued access or use of our services constitutes your acceptance of this Privacy Policy, as amended. It is your responsibility to read this document periodically to ensure you are aware of any changes.

Third-Party Links on Platform

The Platform may include links to third-party websites, plug-ins, and extensions. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements or terms. When you leave our Platform, or engage with such third parties, we encourage you to read the distinct privacy policy of every third-party you engage with. Narachi Leadership and its members do not accept any responsibility or liability for your use of such third-party websites, plug-ins and extensions, nor for the privacy policies and practices of the owners or operators of them.

2. What We Collect About You

Personal data, or personally identifiable information, means ***any information about an individual, both natural and juristic entities (people and companies), from which that entity can be identified***. It does not include information where the identity has been removed (anonymous data).

We may collect, use, store, and transfer ("**process**") different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including full name or the information about you or your company such as company name, address and/or company registration details, identity/ passport numbers, date of birth and age, the country and cities where you are based, photographs, videos and recordings
- **Contact Data** including email address, billing address, and contact numbers.
- **Educational and Professional Information** including your designation or job title, your professional experience and positions you have held within your career, and personality type reports including reports generated from the Myers-Briggs Type Indicator personality assessment and your personality type (which may include your personality type in relation to those present in your company).
- **Personality Metrics and Workshop Data** including 360-degree surveys, the Leadership Circle Profile, other surveys or questionnaires developed by us, feedback reports, discussion notes and action plans, presentations, workbooks, confidential information shared during communication with us, in meetings, coaching and facilitated sessions.
- **Financial Data** including bank account details, where you have shared this with us for specific reasons.
- **Transaction Data** including details about payments to and from you, contracts, contractual terms, contract fees, signups, subscriptions, invoices and other details of products and services you have obtained from us or provide to us.
- **Technical Data** including internet protocol address/es, login data, browser type and version, time zone setting and location, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Platform.
- **Usage Data** including information about how you use our company, Platform, surveys, and services.
- **Marketing and Communications Data** including messages sent to us, your preferences in receiving notices and marketing from us and our third parties and your communication preferences as well as details of which communications were sent to you and how they were sent.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this

data does **not** directly or indirectly reveal your identity. However, if we combine Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy. 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 our services). In this case, we may have to suspend your use of our services and Platform but we will notify you if this is the case at the time.

3. How Is Your Personal data Collected?

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

- **Direct interactions**: You may give us your personal data by using our services, or by corresponding with us through the Platform, by email or otherwise. This includes personal data you provide when you:
  - use our services;
  - use our Platform;
  - voluntarily submit your application via the Platform for the Narachi Mentorship Programme;
  - contract with us;
  - provide any services to us as a service provider or independent contractor;
  - request information to be sent to you;
  - give us some feedback.
- **Automated technologies or interactions**: We do not use solely automated decision-making processes that have a legal or similarly significant effect on you without your explicit consent. As you interact with our Platform, we may automatically collect Technical Data and Usage Data about your device. We may collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties:** We may receive personal data about you from various third parties such as:
  - Google's reCAPTCHA;
  - analytics providers such as Google Analytics;
  - virtual meeting platforms such as Zoom;
  - our contracted web developer;
  - marketing platforms;
  - search information providers; and
  - banking or payment service providers.

4. How we use your Personal data

We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand. Most commonly, we will use your personal data under the following lawful bases:

- where we have your **express consent** to do so;
- where we need to consult with you or **perform on the Services contract** we are about to enter into or have entered into with you;
- where we need to process your application to be part of the Narachi Mentorship Programme and assess your eligibility;
- where it is necessary for our **legitimate business interests** (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- where we need to comply with a **legal or regulatory obligation**.

5. Purposes for which we will use your Personal data

We have set out below the purpose for which we will process your personal data, which includes:

- to engage with you after you have contacted us;
- to assess your eligibility to be part of the Narachi Mentorship Programme and processing your application thereto;
- to administer the Myers-Briggs Type Indicator personality assessment, 360-degree surveys and the Leadership Circle Profile, which includes sharing your data with our service providers in respect to administering the above;
- to facilitate webinars and events and to record such sessions including all outcomes thereof;
- to allow you to use our services and to provide you with our services as contracted;
- to contract with you as a service provider;

- to provide it to our authorised service providers who need your personal data to provide their services to you (whether it is done through Narachi Leadership or directly between you and the service provider;
- to process and service your payment for any services rendered by Narachi Leadership or our service providers;
- to manage payments, fees, and charges;
- to meet our regulatory and compliance requirements;
- to manage our relationship with you which may include notifying you about events/ webinars we are inviting you to attend, changes to our Privacy Policy, or services or the delivery of communications and the effectiveness thereof;
- to administer and protect our company, Platform and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to use data analytics to improve our Platform, services, client relationships and experiences; and
- to communicate with you for any queries, provide you with direct marketing, make suggestions about services that may be of interest.

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 and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will 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 and where required or permitted by law.

Marketing

We strive to provide you with choices regarding how we use your personal data, particularly around marketing and advertising. To manifest your rights attached to any marketing sent to you as an existing client, please use the in-built prompts provided on those communications, or contact us. You will receive marketing communications from us if you have requested our services, requested information from us, or provided us with your details in any other circumstance and, in each case, have not opted-out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by using the built-in prompts or contacting us and requesting us to cease or change your marketing preferences. Where you opt-out of receiving marketing messages, this opt-out will not apply to other personal data of yours which we process for another lawful basis.

Third-Party Marketing

Whilst we may use your personal data within our company, we will get your express opt-in consent before we share your personal data publicly with any entity outside of Narachi Leadership for marketing.

6. Disclosures of Your Personal data

We may have to share your personal data with the parties set out below for the purposes stated above.

- Internal Third Parties including other entities or parties in the Narachi Leadership group and their respective directors, consultants and employees;
- External Third Parties including:
  - authorised third-party service providers under contract with Narachi Leadership who need your personal data to provide their services to you pursuant to your use of our services;
  - other facilitators or specialists within the Narachi Leadership network, to provide you with their services in an instance where we are unable to assist you, or where you request us to make an introduction on your behalf;
  - service providers and contractors providing their services to us and processing your personal data on instruction from us;
  - national governments and/or their respective authorities pursuant to our adherence with legislative requirements; such as tax; and
  - professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services as required.

- Third parties to whom we may choose to sell, transfer, or merge parts of our company or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our company, we may continue to use your personal data in the same way as set out in this Privacy Policy.

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 in accordance with our instructions and standards.

7. Cookies

The Platform may make use of "cookies" to automatically collect information and data through the standard operation of the internet servers. "Cookies" are small text files a platform can use (and which we may use) to recognise repeat users, facilitate the user's on-going access to and use of a platform and allow a platform to track usage behaviour and compile aggregate data that will allow the platform operator to improve the functionality of the platform and its content, and to display more focused advertising to a user by way of third party tools.

The type of information collected by cookies is not used to personally identify you. If you do not want information collected using cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on our Platform and thus if you disable the cookies on your browser you may not be able to use those features, and your access to our Platform will therefore be limited. If you do not disable "cookies", you are deemed to consent to our use of any personal data collected using those cookies, subject to the provisions of this Privacy Policy and our other policies or terms.

8. International Transfers

We may share and process your personal data outside of South Africa and Zimbabwe, including but not limited to The United Arab Emirates, and the European Union, to engage with third party service providers who administer the Myers-Briggs Type Indicator personality assessment and the Leadership Circle Profile, software providers, web development and contractors. Whenever we may transfer your personal data, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have appropriate data protection legislation in place; and/or
- Where we use service providers, we will use specific contracts/clauses which ensure personal data is processed and secured lawfully.
- We will notify POTRAZ of the transfer where appropriate.

9. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed by making use of reputable cloud storage service provider. The information you share with us is stored on our cloud server which is protected by passwords and limited access controls. We do not retain any physical copies of your applications or communication via our Platform, personal information which you communicate to us via email, social media or direct contact with us, nor do we retain physical copies of contracts and related documentation which are entered into with us. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instruction and are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Regulator and POTRAZ of a breach where we are legally required to do so.

10. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for including any legal, accounting, or reporting requirements.

The data you upload onto the Narachi Mentorship Programme Application Form via our Platform, will be held by us for as long as is necessary to review or process your application (approximately 4 weeks), and will be

retained thereafter for our records, for no more than 4 years. The reason we retain your information is particularly for instances where you may have applied more than once over a span of a few years for our Mentorship Programme and have not been successful. This information is solely used to assess your most current application. We may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Your Legal Rights

You have rights in relation to your personal data where we are the relevant "Controller" over such personal data. Please contact us to find out more about, or manifest, these rights:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data where it is no longer needed;
- object to the processing of your personal data;
- request a restriction of processing your personal data;
- request transfer of your personal data; and/or
- right to withdraw consent.

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 may refuse to comply with your request in these circumstances. For more information, please contact our information officer on info@narachileadership.com.

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.
We try to respond to all legitimate requests within one month. Occasionally it may 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.

Users with citizenships from jurisdictions other than South Africa and Zimbabwe, please note that we comply with South African and Zimbabwean data protection laws when processing your personal data. Should foreign law be applicable to your use of our services and/or the Platform in any way, including how we may process your personal data, please contact us and we will gladly engage with you on your rights.