WAKAMOSO PRIVACY POLICY

Version 2.4 · Effective on adoption · Replaces v2.3 (June 2026)

For IO + Deputy IO + Counsel sign-off · October 2026 · Aligned to Wakamoso POPIA Opt-In v2.5

This Privacy Policy explains how Wakamoso Africa (Pty) Ltd ('Wakamoso', 'we', 'us', 'our') collects, uses, stores, shares and protects your personal information. It applies to everyone who creates a Wakamoso account or participates in a questionnaire fielded on the Wakamoso Platform - whether through WhatsApp or the Wakamoso mobile application.

Wakamoso processes personal information in compliance with the Protection of Personal Information Act, No. 4 of 2013 (POPIA). Wakamoso is registered with the South African Information Regulator under Registration Number 2026-018959. The Information Officer accountable for this Policy is Mélani Prinsloo (Chief Executive Officer). Day-to-day operational responsibility sits with the Deputy Information Officer, Michael Matthews (Chief Information Officer). You can reach the Information Officer at info@wakamoso.africa.

This Policy is v2.4 of the Wakamoso Privacy Policy. It supersedes Privacy Policy v2.3 (June 2026). Changes vs v2.3: a person under 18 may use Wakamoso with the prior consent of a parent or legal guardian, in line with POPIA Section 35 and Wakamoso POPIA Opt-In v2.5 (Section 12 rewritten; Section 3.1 cites Opt-In v2.5; Section 13 notes that marketing is not sent to persons under 18). The following are aligned with the Opt-In and the Wakamoso Retention Schedule: Sections 3.1, 13 and 17A state that marketing is off unless you choose to receive it; Section 3.4 distinguishes stopping invitations from withdrawing consent; Section 5 applies the k≥10 floor to cells involving persons under 18 or another vulnerable group, matching the Ethics Framework Vulnerable-Population Module; Section 6 states what Tenants receive from their own questionnaires and names Freepaid as an operator; Section 7 records that the Ethics Review Office decides whether a questionnaire must give support contacts; Section 8 states how you are told about a cross-border transfer; and Section 9 adopts the inactivity, deletion, backup and Wallet-record periods in the Retention Schedule. All other text is unchanged from v2.3.

1. What Wakamoso does

Wakamoso operates a multi-tenant research and data platform. We collect community-generated evidence through structured questionnaires fielded via WhatsApp or our mobile application. We work with six categories of subscribers ('Tenants') - commercial organisations, academic and research institutions, government and municipal bodies, civil-society organisations and NGOs, and programmes and impact initiatives - and we also act as Tenant Zero for our own research.

The data we collect from you may be used to:

- Build your profile on the Wakamoso platform and provide services that depend on that profile.

- Field community capability baselines and other research questionnaires, including the C3B (Community Capability and Conditions Baseline) instrument, the Simmering Pot diagnostic, the SDG Alignment Rubric, and any other questionnaire that has been approved by the Wakamoso Ethics Review Office.
- Measure change over time in the communities and programmes you participate in. Where you are a participant in a programme, we may invite you to repeat measures across the duration of that programme so the programme's impact can be assessed (see Section 1A(b)).
- Generate aggregate evidence about communities at whatever geographic scale is appropriate for the question - from individual streets through sub-places, wards, suburbs, municipalities, districts, provinces, or any custom polygon, with strict re-identification controls (see Section 5).
- Connect you to opportunities, services, or rewards that depend on your geographic, demographic, or skill profile, where you have opted in to those connections.
- Provide anonymised and aggregated insights to Wakamoso Tenants under terms set out in the Wakamoso Subscriber Agreement.
- Communicate with you about platform updates, your account, and any questionnaire you have agreed to participate in.

1A. The Wakamoso operating envelope

This Policy and the Wakamoso POPIA Opt-In cover the following categories of processing. Any specific use within these categories is covered by your acceptance of the Opt-In, and we will not ask you to re-accept the Opt-In each time we run a new survey, onboard a new Tenant within the recognised Tenant categories, or launch a new service within these categories. A new category of processing outside this envelope requires a new version of the Opt-In, offered to you for fresh acceptance.

(a) Cross-sectional community baselines and surveys.

We invite community members to take part in surveys that measure conditions, wellbeing, and capability across an area.

(b) Programme impact measurement and longitudinal tracking.

Where you are a participant in a programme run by a Tenant, or where you are part of a community in which change is being measured over time, we may invite you to repeat the same or similar questions periodically so that change can be measured. Your answers across rounds are linked using a pseudonymous identifier. The linkage is handled by the platform's matching engine; Wakamoso staff do not see your individual trajectory. Outputs from longitudinal measurement are aggregated and respect the publication thresholds in Section 5. Withdrawing your consent (Section 3.4) removes you from any forward-going longitudinal series.

(c) Platform services to you.

Your Wakamoso Wallet, your CV, your profile, community marketplace, your participation in programmes, and the Wakamoso mobile application and its services.

(d) Tenant-commissioned questionnaires.

Surveys commissioned by other organisations across the recognised Tenant categories. Each Tenant questionnaire is reviewed by the Ethics Review Office under the Wakamoso Ethics Framework before it reaches you.

(e) Cohort matching and invitations.

We use your non-Personal answers as pseudonymous targeting criteria to decide whether to invite you to a particular survey, programme, opportunity, or service.

(f) Automated platform routing.

We use automated rules to match you to opportunities and Tenant services; and to determine eligibility for programmes and platform features. Section 7A explains how automated decisions work and your right to request a human reviewer.

(g) Aggregated insight production and publication.

We produce community-level insights from anonymised, aggregated data and publish or share them with Tenants, partners, and the public. Publication respects the thresholds in Section 5.

This Policy covers all Tenants' roles in inviting you, linking your answers across rounds, and producing aggregated outputs. There are no separate consents at the point of action: every category of processing within the operating envelope above is covered by your acceptance of the Wakamoso POPIA Opt-In.

2. What personal information we collect

The personal information Wakamoso collects depends on which questionnaires you participate in. The categories below describe the types of information we may hold.

2.1 Identification and contact

- Your full name, mobile number, email address.
- Your South African identity number where you have provided it for verification purposes.
- Your residential location at the level you choose to provide - a pin you drop on a map, your suburb or town, or another geographic identifier you give us.
- Geolocation captured by the mobile application where you have granted location permission to the app.

2.2 Household and living conditions

- Dwelling type, household size, services available at your dwelling (water, electricity, sanitation, refuse removal).

- Household income band, expenditure pattern, financial stress indicators.
- Employment status, skills, qualifications, work experience (where you have provided them).

2.3 Health, wellbeing and safety

Some questionnaires ask about your health, your household's food security, your wellbeing, your safety in your community, your experience of crime, your experience of household violence, your access to healthcare, and similar matters. These are sensitive topics and they are classified by POPIA as 'special personal information' (Section 26). We collect this information only with your express agreement, and only when the Ethics Review Office has approved the questionnaire (see Section 7).

2.4 Civic, social and cultural information

Your participation in community life, your social and institutional trust, your sense of agency, your civic engagement, your cultural and linguistic practices.

2.5 Verifier and referee information

When you ask Wakamoso to verify information you have provided - for example, your work experience or your skills - we ask you to identify a verifier or referee. You warrant that you have the referee's permission to share their contact information with us, and that the referee is aware their details have been shared.

2.6 Technical information

When you use the Wakamoso mobile application or the WhatsApp channel, we automatically collect technical information including device type, operating system, network type, IP address, and platform usage logs. This information helps us deliver the service, prevent abuse, and improve the platform.

3. How you give us permission to process your information

3.1 The Wakamoso POPIA Opt-In

Before Wakamoso processes your personal information for any purpose, you are asked once to read and accept the Wakamoso POPIA Opt-In. This is a single, one-time opt-in. You can read it before you decide. If you accept, you join the platform and we may process your information for the purposes described in the POPIA Opt-In. If you do not accept, you do not join.

The current Opt-In is the Wakamoso POPIA Opt-In v2.5, published at https://wakamoso.africa/popia-opt-in. It covers: your platform profile and account; participation in research questionnaires fielded by Wakamoso or by Wakamoso's Tenants; programme impact measurement and longitudinal tracking under the categories in Section 1A; aggregated publication of anonymised evidence at appropriate geographic levels; collection of special-category information; automated platform routing and the right to request human review; marketing communications, which are off unless you choose to receive them and which you can stop at any time without affecting your service messages;

verifier and referee details; participation by a person under 18 with the consent of a parent or legal guardian (see Section 12); and your right to withdraw consent and delete your account at any time.

3.2 Receiving a survey invitation on WhatsApp

Where a questionnaire is sent to you via WhatsApp, we send a WhatsApp Template message that introduces the questionnaire, names the Tenant, indicates any reward offered, and invites you to proceed. You can engage with the invitation or ignore it; ignoring an invitation does not change your Opt-In. Every WhatsApp survey invitation includes an OPT OUT option that stops further outbound Wakamoso WhatsApp survey invitations to your number, applied platform-wide.

3.3 The Wakamoso mobile application

Where a questionnaire is sent to you via the mobile application, we send a push notification. You decide whether to tap into the questionnaire. You can disable Wakamoso notifications at any time in your device's settings or in the app's settings; this stops new questionnaire invitations from reaching you, although it does not delete the information we already hold.

3.4 Withdrawing your consent

You can withdraw your consent to the Wakamoso POPIA Opt-In at any time by deleting your Wakamoso account through the mobile application. Withdrawal is forward-looking - it does not affect the lawfulness of processing that took place before withdrawal, and it does not affect anonymised and aggregated outputs that have already been published under the thresholds in Section 5.

Deleting your Wakamoso account removes your Wakamoso profile and the personal information for which Wakamoso Africa is the Responsible Party, including any location you have shared with us. It also removes you from any forward-going longitudinal series (Section 1A(b)), except where the law requires us to retain specific records (for example, fraud-prevention records).

Some surveys on the Wakamoso Platform are fielded by other organisations (Tenants). Where those organisations collected personal information directly through their own questionnaires, they may be separate Responsible Parties under POPIA. Deleting your Wakamoso account does not automatically delete the records they hold. Requests relating to those records must be directed to the relevant organisation.

Stopping invitations is not the same as withdrawing consent. Choosing OPT OUT on a Wakamoso WhatsApp message stops further outbound survey invitations to your number, including invitations to repeat measures in a longitudinal series. Your account, the answers you have already given and the pseudonymous linkage between them remain until you delete your account or the account is closed under Section 9. Deleting your account withdraws your consent and has the effect described above.

4. Special personal information

Some questionnaires touch on health, religion, ethnic origin, criminal behaviour, sex life, trade union membership, political persuasion, or biometric information. POPIA Section 26 classifies these as 'special personal information' and Section 27 requires a specific authorisation to process them. Where Wakamoso collects special personal information, we do so under one or more of the following authorisations:

- Your explicit consent given through the Wakamoso POPIA Opt-In (Section 27(1)(a)), with the right to decline any specific question via 'I would prefer not to say' or 'Other' as set out in the Opt-In.
- The research exemption in Section 32 of POPIA, where the processing is for historical, statistical or research purposes, and we have applied appropriate safeguards including the Ethics Review Office's approval, aggregation, de-identification, and the publication floor in Section 5 of this Policy.
- Prior authorisation from the Information Regulator under Section 57, where required.

Special-category questions in any Wakamoso-fielded questionnaire include an option to decline (for example, 'I would prefer not to say' or 'Other' with an optional follow-up). Choosing the decline option does not affect the reward you receive for completing the rest of the questionnaire.

5. How we publish aggregate evidence - the publication floor

Wakamoso publishes aggregate evidence at geographic scales appropriate to each research question - from streets and sub-places up through wards, suburbs, municipalities, districts, provinces, and any custom polygon agreed with the relevant Tenant or research partner. To protect you from being identified through small-area or small-cohort outputs, we apply a minimum cell-size floor:

- **Standard cells:** we do not publish any cell with fewer than five (5) respondents ($k \geq 5$ anonymity).
- **Sensitive cells:** where a cell intersects health, wellbeing, gender-based violence, religion, criminal-history disclosure, or any of the six C3B Tier One survival flags, or involves persons under 18 or another vulnerable group identified by the Ethics Review Office, we do not publish any cell with fewer than ten (10) respondents ($k \geq 10$).
- **Aggregation:** where a cell fails either floor, we either suppress it or aggregate it up to the next geographic or demographic unit.

These rules are documented in the Wakamoso Data Publication Policy and apply to every dashboard, report, public post, conference presentation, and API output, including longitudinal change outputs.

6. Who we share your information with

Wakamoso shares your information only as follows:

- **With Tenants** who have an approved questionnaire and a signed Subscriber Agreement. Tenants receive only the responses to their own questionnaire. A Tenant

receives your individual answers to its questionnaire, including any Personal information you enter as an answer. Wakamoso does not give the Tenant the mobile number linked to your Wakamoso account or your account identity. The Tenant may still be able to identify you if you are already its customer or employee, or if you give identifying details as answers. Any report, dashboard or output the Tenant produces from those answers is subject to the aggregation level set by the Ethics Review Office's approval and the publication floor in Section 5.

- **With operators acting on our behalf** - for example FuseIT (support partner), Amazon Web Services (hosting, Cape Town region), Meta (WhatsApp Business API), Freepaid (Pty) Limited (redemption of Wakamoso Wallet rewards as airtime or data). Each operator is bound by a Data Processing Agreement that requires them to comply with POPIA and follow our security and confidentiality standards.
- **Where the law requires disclosure** - for example in response to a court order, a regulator's lawful request, or a criminal investigation. We challenge over-broad requests, and we notify you of any such disclosure unless we are legally prevented from doing so.
- **With verifiers and referees** you have named, but only for the purpose of confirming the information you provided.

Wakamoso does not sell your personal information. Wakamoso does not give your information to any third party for that party's independent commercial use.

7. The Wakamoso Ethics Review Office

Every questionnaire fielded on the Wakamoso Platform - whether by Wakamoso itself or by a Tenant - must be approved by the Wakamoso Ethics Review Office before it reaches you. The Office assesses each questionnaire against the Wakamoso Ethics Framework, which includes POPIA checks, methodological checks, respondent-welfare checks, and tenant-type-specific checks. Where a questionnaire touches on a topic that may cause distress or reveal a need for support, the Office decides as part of its approval whether the questionnaire must give you the contact details of relevant support services.

Ethics review is human-led with AI assistance. Our Ethics Assessor AI agent produces the first-pass assessment; our Deputy Information Officer reviews it, modifies or overrides it where appropriate, and signs the decision. An independent Advisory Panel of external members audits a sample of decisions twice a year. We disclose AI assistance on every assessment record.

7A. Automated decisions

Wakamoso uses automated rules in the categories of processing listed in Section 1A - cohort matching, eligibility decisions for programmes and platform features, and similar. POPIA Section 71 gives you the right to request a human reviewer to look at any automated decision that materially affects your rights or your access to a Wakamoso service. No automated decision excludes you from a Wakamoso service you are otherwise entitled to

without a human reviewer being available to consider your case. You can request human review by emailing info@wakamoso.africa or through the Wakamoso mobile application.

8. Where your information is stored and processed

Wakamoso hosts its data in the Amazon Web Services Cape Town region. By default, your personal information does not leave South Africa. Where a cross-border transfer takes place (for example, if a Tenant is incorporated outside South Africa and we share their questionnaire responses with them), we do so only under one of the Section 72 grounds - adequacy decision, binding corporate rules, contractual safeguards, or your specific consent. Where a Tenant questionnaire involves a cross-border element, the Ethics Review Office documents the lawful basis on the survey's Ethics Approval Record before it is sent to you, and the questionnaire tells you about the transfer, the information involved and the recipient before you answer. Aggregated and anonymised insights may be published or shared internationally; these do not identify you.

9. How long we keep your information

We keep your personal information while your Wakamoso account is active. Retention runs from your last engagement with the platform: a survey response, a Wallet redemption, an app sign-in, or a consent action. If there has been no engagement for 24 months, we send you a message asking whether you want to keep your account. If there is no response or engagement within 30 days of that message, the account is closed. We keep individual questionnaire responses in identifiable form for the same period.

When your account is closed or you delete it, deletion of your Personal fields and of the link between you and your answers completes within 30 days, and backup copies cycle out within 90 days. Your Wallet must be at zero before you delete your account; you redeem the balance as airtime or data through Freepaid first. Wallet transaction records are kept for seven years from the end of the relevant tax year, without your identifiers, to meet tax and accounting requirements. The Wakamoso Retention Schedule sets out the retention period for each category of information.

For longitudinal series (Section 1A(b)), we retain the pseudonymous linkage between rounds for the duration of the relevant programme or measurement period, subject to the same inactivity rule. If you delete your Wakamoso account during the programme, we remove you from forward-going analysis; answers you have already given are aggregated under the thresholds in Section 5 and remain in published outputs because they no longer link to you.

After deletion, anonymised and aggregated outputs that have been incorporated into community evidence are retained indefinitely because they can no longer be linked to you. Where the law requires us to keep specific records for longer (for example, fraud-prevention or audit-trail records), we keep those records for the period the law requires.

10. How we keep your information secure

We protect your information using industry-standard measures, including encryption in transit (TLS 1.2 or higher) and at rest (AES-256), role-based access control with multi-factor authentication, quarterly access reviews, security training for all personnel, an Incident Response Plan, and audit logging. Full details are in the Wakamoso Information Security Policy. We host within AWS Cape Town and apply NIST 800-88 secure disposal.

If a personal-information compromise occurs that creates a reasonable risk of harm to you, Wakamoso notifies you and the South African Information Regulator as required by POPIA Section 22.

11. Your rights under POPIA

As a data subject you have the following rights. You can exercise any of these rights at any time.

- **Right to access** - confirm whether we hold your information, and receive a copy of it.
- **Right to rectification** - ask us to correct any inaccurate or incomplete information.
- **Right to deletion** - ask us to delete your information, subject to legal retention obligations.
- **Right to object** - object to specific processing activities.
- **Right to withdraw consent** - withdraw your Wakamoso POPIA Opt-In consent at any time.
- **Right to request human review** of an automated decision under POPIA Section 71 (Section 7A above).
- **Right to be notified** of a personal-information compromise that creates a reasonable risk of harm to you, as required by POPIA Section 22 (Section 10 above).
- **Right to lodge a complaint** with the Information Regulator at https://inforegulator.org.za.

You can exercise these rights through the Wakamoso mobile application, or - if you do not have access to the app - by following the Wakamoso Subject Access Request Procedure. The SAR Procedure is published alongside this Policy and is available on request.

12. Children

POPIA defines a child as a person under the age of 18. Wakamoso may process the personal information of a person under 18 only with the prior consent of a competent person, meaning a parent or legal guardian (POPIA Section 35(1)(a)).

12.1 How consent is given

The parent or legal guardian reads the Wakamoso POPIA Opt-In, confirms that they are the child's parent or legal guardian, and accepts the Opt-In on the child's behalf. We record the name and mobile number of the person who gave consent, their relationship to the child, the version of the Opt-In accepted, and the date and time of acceptance. We may contact the parent or legal guardian to confirm their consent before the child takes part.

12.2 Rights exercised on the child's behalf

The parent or legal guardian may exercise the rights in Section 11 on the child's behalf, including access, correction, withdrawal of consent and deletion of the child's account. Withdrawing consent stops further processing of the child's information for the purposes the consent covered, in the same way as Section 3.4.

12.3 Additional safeguards for persons under 18

- We do not send marketing communications to a person under 18.
- A questionnaire is sent to a person under 18 only where the Wakamoso Ethics Review Office has reviewed it for participants under 18 and approved it on that basis. This applies equally to Wakamoso's own questionnaires and to Tenant questionnaires.
- Pseudonymous targeting criteria (Section 1A(e)) are not used to select persons under 18 for a questionnaire that has not been approved on that basis.
- Outputs that include information from persons under 18 are published only in aggregated form, and no cell involving persons under 18 is published with fewer than ten (10) respondents (Section 5).

12.4 Information collected without consent

Where we discover that we hold personal information about a person under 18 without the consent of a parent or legal guardian, we stop processing it and delete it as soon as we become aware. The child may rejoin once a parent or legal guardian has accepted the Opt-In on their behalf.

13. Marketing communications

Marketing means messages that promote products or services for you to buy. Wakamoso sends marketing communications only if you have chosen to receive them; marketing is off by default. If you choose to receive marketing, you can stop it at any time - through the app's settings, via the unsubscribe link in any email, or by replying OPT OUT to a WhatsApp marketing message. Survey invitations, and messages about your account and about questionnaires you have agreed to take part in, are not marketing, and stopping marketing does not affect them. Wakamoso does not send marketing communications to a person under 18 (Section 12).

14. Cookies and similar technologies

The wakamoso.africa website uses minimal cookies for site analytics and session continuity. We do not use cookies to track you across other websites. The Wakamoso mobile application uses standard mobile telemetry to maintain your session, prevent abuse, and improve the platform.

15. Changes to this Policy

Wakamoso may amend this Policy. When we do, we will publish the new version at https://wakamoso.africa/privacy-policy/, update the version number and effective date, and

notify you of material changes through the Wakamoso mobile application or via WhatsApp. Where a change materially alters how we process your information, we will ask you to re-confirm your consent before the change takes effect for your account. A change is material if it introduces a new category of processing outside the envelope in Section 1A, changes the underlying Responsible Party, expands cross-border transfer beyond Section 8, or otherwise materially affects your rights.

16. Contact us

If you have any question about this Policy, your information, or how we process it, please contact:

- **Information Officer:** Mélani Prinsloo, Chief Executive Officer.
- **Deputy Information Officer:** Michael Matthews, Chief Information Officer.
- **Email:** info@wakamoso.africa.
- **Postal address:** 14 King Street, Irene, Centurion 0062, South Africa.
- **IR Registration Number:** 2026-018959.

17. Governing law

This Policy is governed by the laws of the Republic of South Africa, including the Protection of Personal Information Act, No. 4 of 2013.

17A. What we do not do with your data

We do not use your answers to train general-purpose artificial intelligence models. Your data is used for community insight, cohort matching, and the services described in Section 1A. It is not used as training data for AI systems outside the Wakamoso platform. If our position on this changes, that is a new category of processing and we will publish a new version of this Policy and the Opt-In for your acceptance.

We do not transfer your Personal information out of South Africa except under POPIA Section 72 grounds, with the lawful basis documented on each survey's Ethics Approval Record (Section 8).

We do not send you direct marketing unless you have chosen to receive it (Section 13).

We do not collect your location in the background (Section 2.1).

We do not sell your personal information to any third party.

Master Adoption

This page records Wakamoso Africa (Pty) Ltd's adoption of the master version of the Wakamoso Privacy Policy v2.4. From the adoption date below, this is the canonical master text. Substantive changes require a new version number and a new Master Adoption record.

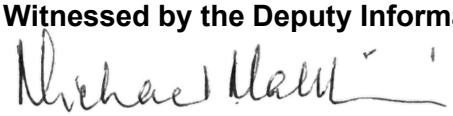
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Information Officer	Mélani Prinsloo, Chief Executive Officer
Deputy Information Officer	Michael Matthews, Chief Information Officer
Internal Counsel	Malusi Mazibuko, Internal Counsel
Information Regulator Registration Number	2026-018959

Adopted by Wakamoso Africa (Pty) Ltd:



Mélani Prinsloo - Information Officer (CEO)
Date: **16/10/2026**

Witnessed by the Deputy Information Officer:



Michael Matthews - Deputy Information Officer (CIO)
Date: 16/10/2026

Reviewed by internal counsel:



Malusi Mazibuko - Internal Counsel
Date: 16/10/2026

Once adopted, this document is locked. The Governance Dashboard records this adoption as a SignOffEvent with the SHA-256 hash of the locked PDF artefact. Subsequent edits require a new version, a new Master Adoption record, and a new SignOffEvent.