

## **General Website and Email Privacy**

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### **WHAT TYPES OF PERSONAL INFORMATION WE COLLECT?**

1. The types of Personal Information that we may Collect includes information necessary to provide our Content and Services. This may include personal information which contains identifiable information such as (amongst other things) your first and last name, screen name, profile pictures, email address, postal address, telephone number, date of birth, details about your telephone device (e.g. mobile phone) and your telephone service provider and if you are a member, information related to the method in which you pay the membership fees ("Personal Information").
2. We may also Collect other information, including your interests, preferences, purchasing behaviour, transactional information, geographical location (which could include various technologies that determine your actual location, such as geographical data from your mobile device (GPS or IP location)) and demographics (e.g., age, gender, and income information).
3. We will attempt to limit the types of Personal Information we Collect to only that to which you consent (for example, in the context of online membership registration, message boards, surveys, polls, receiving newsletters, SMS and other mobile services).
4. When you visit our Website, or use our email our web server also automatically records the name of your ISP (Internet Service Provider), the website from which you visit us, the pages on our sites you visit and in what sequence, and the date and length of your visit.
5. We, our third party service providers and our partners, may send "cookies" to your computer or use similar technologies to enhance your online experience at our Website and across the Internet. "Cookies" are files that can identify you as a unique customer and store your personal preferences as product preferences to tell us which site pages you have visited and in what order. We use cookies and other technical information to personalise your visit to the Website, to analyse traffic on the website and to track user trends, patterns and selections for authorised download and for technical reasons connected with your use of our site. Cookies can either be permanent (i.e., they remain on your computer until you delete them) or temporary.
6. Our email server will collect header information for support purposes and deleted after 60 days.

### **HOW DO WE USE PERSONAL INFORMATION?**

1. We may use your Personal Information to:
  1. provide Services or Content you request (e.g. send you by email or other electronic means our newsletters or other services in which you express an interest);
  2. allow you to participate in recreational activities on the Website (e.g promotional activities, promotional events);
  3. inform you of changes made to our Website;

4. inform you of content, services, promotions, offers and competitions which you may find interesting;
  5. respond to any queries you may have;
  6. develop a more direct relationship with you for the purposes described in this section;
  7. develop your membership profile, if you are a member;
  8. understand general trends and patterns so we can develop and support existing and ongoing strategies for our services and educational content; and
  9. for security, administrative and legal purposes.
2. Where you choose to receive mobile services and content via SMS, MMS and other mobile services, we use this information to deliver such mobile services and content to you, to carry out market research, to track sales data and to plan other promotional or educational activities which may be of interest to you.

#### **WHAT ABOUT PERSONAL INFORMATION THAT IS PUBLICLY AVAILABLE?**

If at any time our Website offers any chat rooms, message boards, blogs, news groups or forums, etc., we Collect the information that you disclose. Such information will be used in accordance with this Privacy Policy. Please note that we are not responsible for other parties' use of the Personal Information which you make available to such third parties through any chat room, message board, blog, news group or forums, etc. on our Website

#### **WILL YOUR PERSONAL INFORMATION BE USED FOR MARKETING PURPOSES?**

1. We may use your Personal Information for the purposes of:
  1. promoting our services;
  2. we will never use or sell your information to market to 3<sup>rd</sup> parties;
  3. You are entitled to request that we desist from using your Personal Information for the purposes of marketing, and we will provide you with the necessary functionality for you to do so with ease, each time we market to you.

#### **WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT YOUR PERSONAL INFORMATION?**

1. Although absolute security cannot be guaranteed on the Internet, we have in place up to-date, reasonable technical and organisational security measures to protect your Personal Information against accidental or intentional manipulation, loss, misuse, destruction or against unauthorised disclosure or access to the information we Collect online or that was offered by you when signing up for a service.

2. While we cannot ensure or warrant the security of any Personal Information you provide us, we will continue to maintain and improve these security measures over time in line with legal and technological developments.

#### **HOW WILL WE STORE YOUR PERSONAL INFORMATION?**

1. We store your Personal Information in South Africa. We may also or alternatively store your Personal Information on and transfer your Personal Information to a central database located in South Africa and or external servers. If the location of the central database is located in a country that does not have substantially similar laws which provide for the protection of personal data, we will take the necessary steps to ensure that your Personal Information is adequately protected in that jurisdiction.
2. Your information will not be stored for longer than is necessary for the purposes described in this Privacy Policy.

#### **WILL YOUR PERSONAL INFORMATION BE SHARED WITH ANYONE ELSE?**

1. We will never share your personal data with 3<sup>rd</sup> parties unless it is deemed necessary to provide you with the service you have requested from us, and then we never grant permission for 3<sup>rd</sup> parties to use your data except to provide service.
2. Third parties: We may disclose Personal Information about you to other third parties to comply with applicable laws and regulations. We also reserve the right to disclose such Personal Information to third parties where a complaint arises concerning your use of our Website and where we believe, in our sole discretion, that your use of our Website is inconsistent with the Privacy Policy. We also share information about users of this Website in an anonymous or aggregate form with third parties including advertisers and business partners, to understand customer trends and patterns and manage and improve our business relationships. We provide your Personal Information to third party processors to administer and process for the purposes notified to you in this Privacy Policy, and we may also share such details with third parties (such as auditors or legal advisors) to obtain professional advice. Any such processing will be governed by an agreement in the form required by law, preserving and all of your statutory data protection rights.
3. Links, advertisers, third party sponsors & ad-servers: Our and your Website may contain links to other websites that are not covered by this Privacy Policy and where information practices may be different from ours. We encourage you to consult the other sites' privacy policies on such third party sites before submitting any Personal Information, as we are not responsible for and have no control over Personal Information that is submitted to, or collected by, these Third Party Websites. On this Website, we sometimes offer content or programmes that are sponsored by or co-branded with identified third parties (e.g., educational events or promotions). These third parties can obtain Personal Information that you voluntarily submit to them to make use of the offer. We are not responsible for the collection and use of your Personal Information by these third parties. However, you should be informed, at the point of collection of such personally identifiable information, if these third parties will obtain such information, how it will be processed and to whom it will be transferred. On our Website, third parties may present or serve

advertisements, provide us with data collection, reporting and ad response measurement, as well as assist with delivery of relevant marketing messages and advertisements. These third parties may view, edit, or set their own cookies. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Privacy Policy.

#### **HOW CAN YOU FIND OUT WHAT PERSONAL INFORMATION WE HOLDS ABOUT YOU?**

1. To see the Personal Information we have collected through this Website or our service that relates to you, to cancel it and/or to correct or update this Personal Information please contact us. In addition, we will always give you the opportunity to update your preferences regarding our use of your Personal Information.

#### **USE OF THE WEBSITE BY CHILDREN**

1. Our service is not available to children under the age of 18.
2. Visitors of our site are not monitored by age as we do not host any adult content.

#### **CHANGES TO THIS PRIVACY POLICY**

1. From time to time, we may revise this Privacy Policy to reflect company initiatives, changes in the law or technology or changes in our practices regarding the collection and use of Personal Information. If we decide to change this Privacy Policy, the changes will be posted on this Website so that you are always informed of the latest version.
2. We will not use or disclose Personal Information provided to us pursuant to this Privacy Policy in ways other than the ones described above, without informing you and providing you with the opportunity to consent to such modified conditions concerning the use and disclosure of your Personal Information.

#### **GOVERNING LAW**

1. The contents of this Privacy Policy shall be governed by South African and EU regulations.

If any provision of this Privacy Policy is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced unless a court of competent jurisdiction determines that the substantive purpose of this Privacy Policy is then frustrated, in which case you may contact us in order to opt-out of the Privacy Policy.