

Rain Group Holdings (Pty) Ltd

(Registration number: 1947/024435/07) together with its
subsidiaries(**“The Company”**)

PRIVACY POLICY

as prescribed by the provisions of

THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

1 DEFINITIONS

- 1.1 **Company** means Rain Group Holdings (Pty) Ltd (registration number 1947/024435/07), a company duly registered and incorporated with limited liability in accordance with the company laws of the Republic of South Africa and having its principal place of business situated at Block D, The Main Straight Office Park, 392 Main Road, Bryanston, 2191, Republic of South Africa together with its subsidiaries as specified in **Appendix 1**;
- 1.2 **Conditions for Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- 1.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 1.4 **Customer** refers to any natural or juristic person that received or receives services from the Company;
- 1.5 **Channel** refers to a platform made available to the Data Subject through which the Data Subject can interact with the Company.
- 1.6 **Data Subject** has the meaning ascribed thereto in section 1 of POPIA;
- 1.7 **Head of the Company** means the “head” as defined in section 1 of PAIA and referred to in clause 4;
- 1.8 **Information Officer** means the Company’s appointed Information Officer as referred to in clause 4;
- 1.9 **Manual** means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;
- 1.10 **PAIA** means the *Promotion of Access to Information Act, 2000*;
- 1.11 **Personal Information** has the meaning ascribed thereto in section 1 of POPIA;
- 1.12 **Personnel** refers to any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- 1.13 **POPIA** means the *Protection of Personal Information Act, 2013*;
- 1.14 **POPIA Regulations** mean the regulations promulgated in terms of section 112(2) of POPIA;
- 1.15 **Private Body** has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;

- 1.16 **Processing** has the meaning ascribed thereto in section 1 of POPIA;
- 1.17 **Responsible Party** has the meaning ascribed thereto in section 1 of POPIA;
- 1.18 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 1.19 **Requester** has the meaning ascribed thereto in section 1 of PAIA;
- 1.20 **Request for Access** has the meaning ascribed thereto in section 1 of PAIA; and
- 1.21 **SAHRC** means the South African Human Rights Commission.

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

2. INTRODUCTION

- 2.1 This privacy policy is issued on behalf of the Company.
- 2.2 The Company is committed to protecting your privacy and personal information and complying with applicable data protection and privacy laws in South Africa when you access our site or make use of the Company's Services, and accordingly, shall take all reasonable steps, including technological, procedural and controls, to protect your personal information. Any personal information that you provide when accessing the Company will be used and retained in accordance with this Privacy Policy and all other relevant codes and standards. This Privacy Policy is intended to inform you of the privacy practices that apply to your access and use of the Company's Services, and to explain how we collect, store, use, transfer and disclose your personal information. We also describe the kinds of information that the Company collects from you.
- 2.3 The Company is made up of different legal entities which are incorporated in South Africa. When we mention "Rain", "we", "us" or "our" in this privacy policy, we are referring to the Company responsible for processing your data.
- 2.4 In this policy, reference to "Data Protection Laws" means any statutes, laws, legislation, or regulations or binding policy, code of any government authority that relates to the security and protection of personally identifiable information, data privacy, trans-border data flow or data protection in force from time to time in the Republic of South Africa, including but not limited to POPIA, Electronic Communications and Transactions Act 25 of 2002, Promotion of Access to Information Act 2 of 2002, and/or any equivalent legislation of other jurisdiction(s) where Personal Information is being processed or where a party is obliged to comply with, including, where applicable, EU Data Protection Laws [General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of national persons with regard to the Processing of Personal Data and on the free movement of such data, as amended, replaced or superseded from time to time.
- 2.5 In this policy, the use of any word or expression, or terms or process of definition in this policy which has its meaning derived from the Protection of Personal Information Act 4 of 2003 ("POPIA"), including but not limited to "Personal Information", "Responsible Party", "Data Subject", "Personal Information Breach", "Information Regulator", will be construed to mean the corresponding word or expression or term or process or definition which has its meaning derived from GDPR or any applicable Data Protection Laws, such as "personal data", "controller", "data processor", "process" / "processing", "data subject", sub-processor", "personal data breach", supervisory authority", "commission", "member state".
- 2.6 We are a data controller of your Personal Information. This means that we are responsible for deciding how we hold and use Personal Information about you. We always aim to be transparent about how we use your data and Personal Information, and to comply with

applicable Data Protection Laws in making you aware of the information contained in this policy.

2.7 We do not circumvent any of the personal privacy settings on any of the platforms and/or suppliers from where we collect data. Our system processes is intended for and focused on information that our customers have given us access to and/or have sent directly to us, such as documents (ID and Proof of Address) required for RICA and sim activations.

3. THE PURPOSE OF THIS PRIVACY POLICY

3.1 This policy will inform you about what data we collect from our data subjects (natural or juristic), including but not limited to various Company Channels, Services and social platforms, with whom we have direct relationships for purposes of our business, how we use such data, circumstances where we may disclose this data to others, and how we keep it secure.

3.2 Any questions relating to this policy and our privacy practices should be sent to us using the contact details set out below.

4. COMPANY DETAILS

4.1 The details of the Company are as follows:

Physical address	Block D, The Main Straight Office Park, 392 Main Road, Bryanston, 2191, South Africa
Postal address:	P O Box 651921, Benmore 2010
Telephone number:	(+27) 87 727 6000
Fax number	N/A

5. CONTACT DETAILS OF THE INFORMATION OFFICER

5.1 The Information Officer's contact details are as follows:

Physical address	Block D, The Main Straight Office Park, 392 Main Road, Bryanston, 2191, South Africa
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Postal address	P O Box 651921, Benmore 2010
email address:	philam@rain.co.za legal@rain.co.za
Fax number	N/A

6. INFORMATION THAT WE MAY COLLECT FROM YOU (THE DATA SUBJECT)

6.1 We use the term “personal information” or “personal data” to mean information that relates to you. Personal information includes, for example, your name, contact information including your cell phone number, email address, identity number, and information relating to your residential address. Information that is not linked to a particular individual, such as statistical or aggregated information, is not personal information and is not covered by this Privacy Policy. We may collect, process, use, disclose and transfer non-personal information for any purpose. You can choose not to provide personal information that we may request of you, but, in general, most of the personal information we request is required in order to provide the Services, and the lack of such personal information may prevent us from doing so.

6.2 Generally, we may collect personal information about you when you access the Company’s Channel and/or subscribe for the Services offered on the Company’s Channel. We may also collect information about you when you use the site, report a problem with the site, use support services, or communicate with us. In addition, information may be collected when you respond to customer surveys, and promotions. What is mentioned above is not a complete list of all the ways that we could collect information. We set out below information that may be collected and processed. These are as follows: -

- 6.2.1 Information that you provide on or through the Company’s Channel. This includes information provided at the time of registering to use the Company’s Channel (if applicable), receive maintenance, making payments or posting material. We may also ask you for information when you report a problem with the Company’s Services.
- 6.2.2 Details of your visits to and use of our site and/or mobile App including, but not limited to, traffic data, location data, weblogs, service provider page viewing statistics and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- 6.2.3 Details about problems that may occur when you utilize our Services, and/or use our help desk, if applicable.
- 6.2.4 Information related to you and your use of the Company’s Channel and/or the Services, including but not limited to your online activity, contributions, payment history,

correspondence, internet protocol addresses, device and software data (such as type, configuration and unique identifiers);

- 6.2.5 A record of correspondence if you contact us.
- 6.2.6 Information obtained from surveys that we may ask you to voluntarily complete from time to time, which we use for research purposes.
- 6.2.7 Information posted by you pursuant to reviews of the Company's Channel and the Services: and
- 6.2.8 any other information that may be necessary: (i) to carry out actions for the conclusion or performance of a contract to which you are a party; (ii) to comply with an obligation imposed on us by law; (iii) to protect your legitimate interest; (iv) to pursue a legitimate interest of ours or of a third party to whom the information is supplied.

6.3 Rain may also collect non-personal information such as your IP address, date, time, and duration of your access to the Company's Channel to track your visits to the Company's Channel so that we are able to deliver a more personalized experience. This information is used to develop future products and/or services that meet your requirements and needs.

6.4 We may collect information about your device, mobile or other, including where available your internet protocol address, operating system, and browser type, for system administration and to report aggregate information to our advertisers and/or service providers. This is statistical information about your browsing actions and patterns and does not identify you.

6.5 By using the Company's Channels, including but not limited to the website and mobile app, you are consenting to our use of cookies, caching tools and analytics tools, in accordance with this Privacy Policy. If you do not agree, please refrain from using the Company's Channel. We use cookies and similar technologies to collect additional data and to improve our Services. These technologies use small data files that are transferred to your mobile device. If you return to an application, it shows that it is a repeat visit. The technologies cannot be used to identify you on the websites of third parties, including the website of the analysis provider. It can additionally be used to store your preferred settings, e.g., language and country settings, so that they will be immediately available on your next visit. We use the web analysis system to raise the efficiency of our mobile App. Personal information is collected and stored either electronically using "cookies" or provided voluntarily with your consent and knowledge.

6.6 We do not knowingly collect or share: -

- 6.6.1 except in the form of Aggregated Data any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data);
- 6.6.2 any information about criminal convictions and offences.; or
- 6.6.3 any information relating to children under the age of 13.

6.7 We are committed to respecting the privacy of children online. If we learn that our systems have inadvertently collected information relating to children under the age of 13, we will promptly delete the information, notify the necessary customer representatives to facilitate a consultation on how this data was collected and put measures in place for it not to happen again.

7. WHERE WE PROCESS AND STORE YOUR PERSONAL INFORMATION

- 7.1 The information that we collect from you is stored and processed within the Republic Of South Africa and may be transferred to, and stored at, a destination outside of South Africa.
- 7.2 It may also be processed by staff members operating outside of South Africa who work for us or for one of our service providers (including but not limited to payment processors, cloud service or other information technology providers, and other companies that provide services to us). Such staff members may be engaged in, among other things, the provision of the service or the provision of maintenance and support services.
- 7.3 By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and in accordance with the terms of POPIA.

8. HOW YOUR PERSONAL INFORMATION IS USED – PROCESSING, COLLECTION AND SHARING

- 8.1 We will only process your Personal Data when we have legal grounds to do so. Generally, we rely on the legal ground which allows us to process your Personal Data where it is necessary for our legitimate interests (our subsidiaries, parent companies, and affiliates) and your interests and fundamental rights do not override those interests.
- 8.2 Our legitimate interests for processing data are in order to provide our Services to our customers, which include providing technology and mobile data services.
- 8.3 We also use the data in related or ancillary ways, to the Services that we offer. For example, we may use the data to comply with our legal obligations or enforce our rights, including the

legal obligations or enforcement of rights of third parties. We may also use the data to improve our Services.

8.4 For us to make your use of the Company's Channel and Services as successful as possible, the Company collects, stores, and uses your personal information. Below are some of the purposes for us collecting your personal information, in relation to which purposes you hereby expressly consent to our processing your personal information:

- 8.4.1 To communicate requested information and Services to you.
- 8.4.2 To authenticate the user and provide access to restricted pages.
- 8.4.3 To create products or services that may meet your future requirements.
- 8.4.4 To compile non-personal statistical information about browsing habits, click-patterns and access to the Company's Channel.
- 8.4.5 To ensure that content on the Rain Channel and the Services are presented in the most effective manner for you and for your computer or other device.
- 8.4.6 To determine your general geographic location, enforce the terms of this Privacy Policy, personalize the Company's Channel and the Services and our marketing to better reflect particular interests, helping us to quickly and efficiently respond to inquiries and requests and otherwise analyze, enhance, administer or promote the service offering for you and other users.
- 8.4.7 To carry out our obligations arising from any agreements entered between you and us, if any.
- 8.4.8 To allow you to participate in interactive features of the Company's Channel and Services, when you choose to do so; and
- 8.4.9 To notify you about changes to the Company's Channel and Services.

8.5 We will only share your data with any member of our company group (i.e. our subsidiaries, parent companies, and affiliates).

8.6 We may share your data with selected third parties, including our business partners, suppliers, for the performance of any contract we enter into with them. We may also share your data with analytics and search engine providers that assist us in the improvement of our website and systems.

8.7 We may also disclose your data to other third parties. For example, if we sell or buy any business or assets, we may disclose your data to the prospective seller or buyer of such

business or assets. Alternatively, if we or substantially all of our assets are acquired by a third party, your data may be part of the transferred assets.

8.8 If any third-party processes any of your data, we ensure there are sufficient contractual and operational safeguards protecting your data.

8.9 In respect of your Personal Data, we will not:

8.9.1 sell, licence or purchase any data obtained from Social Media Platforms.

8.9.2 directly or indirectly transfer any of your Personal Data (including anonymous, aggregate, or derived data) to any ad network, data broker or other advertising or monetization-related service.

8.9.3 use your Personal Data to make decisions about eligibility, including whether to approve or reject an application or how much interest to charge on a loan.

8.9.4 put your Personal Data in a search engine or directory or include web search functionality on our apps on Social Media Platforms.

8.9.5 prefill any content in captions, comments, messages, or the user message parameter of posts.

8.9.6 proxy, request or collect your usernames or passwords for Social Media Platforms.

8.9.7 transfer your Personal Data to a data broker or sell your Personal Data.

8.9.8 share your user IDs for Social Media Platforms with service providers who build or run any of our apps. Your user IDs for Social Media Platforms will be kept secure and confidential; and/or

8.9.9 use friends or connections data from Social Media Platforms to establish social connections in our apps, unless you have granted you access to that information.

8.10 If you have any concern regarding the use of your information, please contact us at legal@rain.co.za

8.11 Except as otherwise set out expressly herein, we do not disclose personal information about users to our advertisers (if any) but we may provide them with aggregate information or information in an otherwise anonymous form about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement and/or application on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, individuals in a specific territory).

8.12 We may make use of the personal information we have collected from you to enable us to comply with advertisers' wishes by displaying their advertisement to that target audience.

8.13 In addition, we may use other companies, agents, or contractors to perform services on our behalf or to assist us with the provision of access to the Company's Channel and the Services to you. For example, we engage services providers to provide marketing, communications, infrastructure, and information technology services, personalize and optimize our site and the online services, provide customer service, analyze and enhance data, including users' interaction with the online services, and process consumer surveys. In the course of providing such services, these service providers may have access to your personal information. We do not authorize these service providers to use or disclose your personal information except in connection with providing the services we request of them.

8.14 Only personal information that is necessary for the purposes stated in this Privacy Policy will be collected, stored, used and otherwise processed by the Company.

9. DISCLOSURE OF YOUR PERSONAL INFORMATION

9.1 All non-personal information collected and assembled by the Company, is owned and retained by the Company. You are hereby expressly notified of and consent to our collection of your personal information.

9.2 The personal information that has been collected by the Company, may be disclosed or otherwise processed by us if permitted by applicable law, if necessary, consent has been obtained from you and/or if the access, use, preservation, disclosure or other processing of such information is reasonably necessary: -

9.2.1 For legal and regulatory compliance of applicable law, regulation, legal process, or governmental request.

9.2.2 To conduct research and improving our products or services.

9.2.3 To enforce applicable terms of use and terms and conditions (including but not limited to this Privacy Policy), including investigation of potential violations thereof.

9.2.4 To detect, prevent, or otherwise address illegal or suspected illegal activities, security, or technical issues.

9.2.5 To protect against harm to the rights, property or safety of us, our users or the public as required or permitted by law, which includes exchanging

information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- 9.2.6 In connection with any reorganization, restructuring, merger or sale, or other transferring of assets; provided that the receiving party agrees to respect your personal information in a manner that is consistent with this Privacy Policy; and/or
- 9.2.7 For the compilation, use and sharing of information that does not pertain to any specific individual, and you hereby consent to us and our duly authorized agents and contractors processing your personal information for such purposes.
- 9.2.8 The Company may for lawful purposes and in accordance with applicable laws, monitor your activity and such information will be made available to the authorities if and to the extent required by law.

10. YOUR RIGHTS AND OBLIGATIONS

- 10.1 You have the right to ask us to review your personal information that you have provided to us and make any desired changes to it.
- 10.2 You have the right to request the origin of the personal information pertaining to you.
- 10.3 You have the right to choose whether you wish to receive marketing material. By accepting this policy, you consent to receiving marketing material. Should you wish to no longer receive such material you can opt out by contacting us by email at legal@rain.co.za. The Company undertakes to comply with all applicable law in relation to direct marketing including the CPA in this regard.
- 10.4 You have the right to request the Company to correct or delete your personal information. However, the Company will retain such personal information that it is required to retain in terms of any applicable law and/or in concert with prescribed retention periods. We take reasonable steps to ensure that the personal information we collect, and store is accurate, complete and up to date. We also endeavor as best we can to delete any incorrect or unnecessary personal information, particularly in respect of your contact details. Please ensure that your personal information is accurate, complete and up-to date by contacting us as soon as possible if you become aware that your personal information is in any way inaccurate, incomplete or out-of-date.
- 10.5 You have the right to request details in respect of the identity of third parties who have or had access to your personal information, if applicable, and you have the right to request the

identity of third persons who are in charge of your personal information as well as those third person to whom your personal information may have been communicated, if applicable.

10.6 You have the right to lodge a complaint with the Information Regulator in accordance with POPIA.

10.7 Please note that you have an obligation to provide the Company with accurate personal information keep Rain informed of any changes to your personal information as and when these occur.

10.8 Please note that the Company may, from time to time, contain links to and from the websites of our partner networks, advertisers, service providers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and that Rain does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. SECURITY OF YOUR PERSONAL INFORMATION

11.1 Rain is committed to protecting the security of your personal information and will take all reasonable steps to secure the personal information that you submit to us, including your contact information.

11.2 We use a variety of security technologies and physical, electronic, and managerial procedures to protect the personal information that we have collected, or that you have provided, from unauthorized access, use or disclosure.

11.3 This will minimize the risk of loss, misuse, alteration, disclosure and unauthorized access of your information that is under our control. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot always guarantee the security of your personal information which is transmitted via the Company's Channel.

12. ACCESS TO PERSONAL INFORMATION

12.1 POPIA gives you the right to access information held about you. Your right of access can be exercised in accordance with POPIA.

12.2 Any access request may be subject to a fee for meeting our costs in providing you with details of the information we hold about you.

13. HOW LONG WE WILL KEEP YOUR PERSONAL INFORMATION

13.1 We review our data retention periods regularly and will only hold your Personal Data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information). However, if you request that we delete your data, we will delete your data from our system, provided it is not in contravention of any laws or current legislation.

13.2 Details of retention periods for different aspects of your Personal Data are available in our retention policy are available by contacting us using the details provided below. 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 unauthorized 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 requirements.

14. CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on our website and, where appropriate, displayed on our premises notified to you by e-mail.

Appendix 1

SUBSIDIARIES

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