

Privacy Policy

1. **Introduction**

- 1.1 E-Centive Proprietary Limited (“ We” or “Us” or “Our” whether upper case is used or not in such terms hereunder) is committed to safeguarding the privacy of visitors to our system.
- 1.2 We recognise the importance of protecting your privacy in respect of your personal information [as defined in the Protection of Personal Information Act 4 of 2013, ("POPI")] collected by us when you use the system.
- 1.3 Please read this entire Privacy Policy to understand how your information will be treated. This policy may be updated from time to time without notice, so please check it on a regular basis.
- 1.4 You are not required to provide any personal information on the public areas of the system. However, you may choose to do so by completing the application forms on various sections of our system to the extent relevant, including:
 - 1.4.1 to make contact in respect of any questions you may have about this Privacy Policy;
 - 1.4.2 to facilitate your registration for the incentive program’s offered;
 - 1.4.3 to track your claims to incentives;
 - 1.4.4 to ensure that your incentive card is linked to your profile and delivered to you;
 - 1.4.5 to ensure your incentives are paid;
 - 1.4.6 to verify details provided;
 - 1.4.7 to provide you with updated information about products to which incentives are linked or related upon which you are eligible to earn incentives;
 - 1.4.8 to make contact with our services team;
 - 1.4.9 subscriptions to newsletters and publications;
 - 1.4.10 product or service enquiries;
 - 1.4.11 seminars or other events;
 - 1.4.12 card PIN or portal password resets;
 - 1.4.13 polls or quizzes;
 - 1.4.14 updates to the portal which may included but are not limited to new features, business rules, workflows in the portal or pages to the portal;

- 1.4.15 exciting updates from the manufacturers or network on products or packages;
- 1.5 This policy seeks to balance our business interests and your reasonable expectation of privacy. We will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information.
- 1.6 By continuing to use this system you agree that we may "collect, collate, process and/or store" your personal information (as defined in POPI) ("process") for, the purposes set out in this Policy including providing you with access to the system and the system content.
- 1.7 Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

2. **What types of personal information do we process?**

2.1 The types of personal information that we may process includes (amongst other things):

- 2.1.1 your full names (name and surname),
- 2.1.2 identity or passport numbers,
- 2.1.3 e-mail and physical addresses,
- 2.1.4 contact information,
- 2.1.5 agent ID also known as salesman code,
- 2.1.6 information relating to your occupation,
- 2.1.7 support ticket queries and information,
- 2.1.8 and the pages of the system viewed by you.

2.2 We will limit the types of personal information we process to only that to which you consent and which is necessary for our legitimate business interests.

3. **How do we use your personal information?**

3.1 We will only use the information you provide to us on these sections of the system in order to process the relevant application or registration form and incentive payment transactions.

3.2 We will not retain your information longer than is necessary to achieve the purpose for which the information was collected and processed unless we are required to do so by law or there is a lawful purpose to retain your information for a longer period.

4. **When will we process your personal information?**

4.1 Personal information may be processed when you:

- 4.1.1 populate the relevant application form(s) on our system to subscribe or register;
 - 4.1.2 log a claim or support ticket or when a claim is logged automatically on your behalf from sales files received;
 - 4.1.3 browse the portal.
- 4.2 You acknowledge that all personal information processed by us may be stored by us and used for purposes specified in this Privacy Policy.

5. **Use of cookies**

- 5.1 Cookies are pieces of information a website/system transfers to a user's hard drive for record-keeping purposes. Cookies make browsing the web easier for you by saving your preferences and tracking your online habits, traffic patterns, and making sure you do not see the same advertisement too often. The use of cookies is an industry standard.
- 5.2 We may place a cookie on your browser to store and sometimes track the information referred to above in 5.1.
- 5.3 While most browsers are initially set up to accept cookies, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. Please note that some parts of the system will not function properly if you refuse cookies.

6. **Use of IP address**

- 6.1 An Internet Protocol (IP) address is a number that is automatically assigned to a computer whenever it is connected to the Internet. We log IP addresses or the location of computers on the Internet.
- 6.2 We collect IP addresses for the purposes of system administration and to audit the use of the system. We do not link IP addresses to personal information unless it becomes necessary to enforce compliance with the Privacy Policy or to protect our system or its users.

7. **Links to other sites**

- 7.1 When you are using the portal, you could be directed to other sites that are beyond our control. We are not responsible for the content or the privacy policies of those third party websites/systems.

8. **Sharing of your personal information**

- 8.1 You consent that we may disclose your personal information to Ecentive approved third party providers (as referred to below in 8.2.1) where necessary;
- 8.2 You agree that once your information has been de-identified, i.e.: delete any information that identifies you, personal information may be shared under the following circumstances:
- 8.2.1 To our agents, advisers, service providers and suppliers (our SEO agency, creative, brand, digital and media agencies, Microsoft, Google and other research agents);

- 8.2.2 To monitor web traffic: web servers serving the system automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits;
- 8.2.3 For statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the system (for product development purposes);
- 8.2.4 To government and law enforcement agencies, where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the Privacy Policy or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

9. **Your rights**

9.1 You have the right to:

- 9.1.1 withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on condition that the withdrawal of your consent does not affect:
 - 9.1.1.1 the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body; or
 - 9.1.1.2 the processing of your personal information before the withdrawal of your consent; or
 - 9.1.1.3 the processing of your personal information as required to finalise the performance of a contract in which you are a party; or
 - 9.1.1.4 the processing of your personal information if the processing is in compliance with an obligation imposed by law on us; or
 - 9.1.1.5 the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 9.1.2 object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests; our legitimate interests or the legitimate interests of a third party to which the information is supplied.

- 9.1.3 request that we correct, destroy or delete any of your personal information that we have processed in accordance with this policy. The personal information that you may request us to correct, destroy or delete is personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.
- 9.1.4 not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 9.1.5 not to be subjected to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you.
- 9.1.6 object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- 9.1.7 not to be subjected to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you. Decisions that you may not be subjected to are decisions that result in legal consequences for you or affect you to a substantial degree:
 - 9.1.7.1 Without being for the execution of a contract that you have received performance for; or
 - 9.1.7.2 Decisions made that are not in terms of law or of a code of conduct that specifies what appropriate measure must be taken to protect your legitimate interests.
- 9.1.8 not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 9.1.9 to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.
- 9.1.10 you have the right to submit a complaint to the Information Regulator (once fully operational) regarding an alleged interference with the protection of personal information processed in accordance with this policy.

10. **Contact Information**

- 10.1 If you have any questions in relation to this Privacy Policy please contact us at the email address displayed on the log in page of the system.

10.2 If you currently receive marketing information from us via SMS or email which you would prefer not to receive in the future, please use the Opt-out or Unsubscribe link to unsubscribe from the distribution list.