

GoMobile (Pty) Ltd

Privacy Policy

March 2021 | Version 1.0

We respect your privacy. Please read the full privacy policy because it applies to you

1. Introduction

We are GoMobile (Pty) Ltd (Registration number 2012/133150/07).

This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

In the bulk of our business relationships we act as the Operator to the Responsible Party (POPIA) who is our Subscriber (customer).

2. Audience

This policy applies to you if you are:

- a Subscriber to our Magnitude application-platform (*service*); or
- a system User of the service, associated in some or any way with a Subscriber; or
- a visitor to our website.

3. Personal information

Personal information includes:

- certain information that we may collect automatically when you utilise our service or visit our website;
- certain information that we may collect upon registration for service (see below);
- certain information that we may collect upon submissions; and
- optional information that you may provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

3.1. Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address or location; or
- **demographic information** – such as your gender or marital status.

3.2. Sensitive personal information

While it is unlikely, depending on the level of service required by the Subscriber to our service, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **sexual information** – such as information about your sex life or sexual orientation;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** – including your membership of a trade union; and
- **beliefs** – including your political or religious beliefs.

4. Acceptance

4.1. Acceptance required

You must accept all the terms of this policy when you subscribe to our service. If you do not agree with anything in this policy, then you may not engage our services.

You may not request our services if you do not accept this policy

4.2. Legal capacity

You may not request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

4.3. Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

4.4. Your obligations

You may only send us the information of other data subjects where you have their permission to do so.

5. Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

6. Collection

6.1. On registration

Once you register onto our service you will no longer be anonymous to us. You will provide us with certain personal information when you register on our website.

This personal information may include:

- your name and surname;
- your email address;
- your telephone number;
- your company name, company registration number, and VAT number;
- your postal address or street address; and
- your username and password.

We will use this personal information to fulfil our obligations to the relevant Subscriber, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

We collect information on registration, when you register onto our services

6.2. From browser

We may automatically receive and record Internet usage information on our server logs from your browser / mobile device, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the service and website, and the dates and times that you visit the service and website, paths taken, and time spent on sites and pages within the service and website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

6.3. Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties (eg Channel Partners) to provide services to our website.

6.4. Optional details

You may also provide additional information to us on a voluntary basis (**optional information**).

6.5. Recording calls

We may record any telephone / video calls between us, unless you specifically request us not to.

6.6. Purpose for collection

We may use or process any information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **services purposes** – such as executing on process requests by the Subscriber of system Users of the service;
- **business purposes** – such as business-analysis, accounting or other proposed and actual transactions; and
- **legal purposes** – such as pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the service and website;
- monitor service and website usage metrics such as total number of visitors and pages accessed; and

We may use any of your personal information that is provided to us for the purposes that you have indicated when you agreed to provide it to us.

7. Use

7.1. Our obligations

7.2. Messages and updates

We may send administrative in-app messages, email and other electronic updates to you with respect to the service.

We may use your information to send you administrative messages and electronic updates to you with respect to the service.

8. Disclosure

8.1. Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our services, and communications.
- other third parties who provide us with relevant services where appropriate.

We may share your personal information with third parties for the purposes of fulfilling our obligations to our Subscribers.

8.2. Regulators

We may disclose your personal information as required by law or governmental audit.

8.3. Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

8.4. No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

8.5. Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

8.6. Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

8.7. Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website.

9. Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host the service in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our service is hosted on a secure server and uses security measures to prevent interference by intruders.

10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy.

A Subscriber may review or update any personal information that we hold on their behalf by accessing their service.

11. Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

12. Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

13. Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu within the service or contacting us by email.

14. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

15. Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us via www.MagnitudeApps.com