

# PRIVACY STATEMENT

We take your privacy seriously and are committed to protecting your Personal Data.

This Privacy Statement governs **your visit to this website and the use of our products and services**. It explains how the Ignition Group collects, processes, safeguards, uses, discloses, transfers and/or shares your Personal Data and how you can check and update any of your Personal Data should you require to do so.

In South Africa, the Protection of Personal Data Act No. 4 of 2013 ("POPIA") is the law that applies to the protection of Personal Data. In Europe, it is the General Data Protection Regulation (EU) 2016/679 ("GDPR").

This Privacy Statement has been drafted in accordance with the provisions of POPIA in consideration of the GDPR.

By visiting this website and communicating electronically with us, **you consent to the processing and transfer of your Personal Data** as set out in this Privacy Statement below.

## 1. GENERAL

1.1 When we refer to the ("Ignition Group", "we", "us" or "our") in this Privacy Statement, we mean Ignition Telecoms Investments Proprietary Limited and its subsidiary companies, including, but not limited to:

- 1.1.1 All Sevens Trade and Invest Proprietary Limited
- 1.1.2 Comit Technologies Proprietary Limited
- 1.1.3 CCS Outsourcing Proprietary Limited
- 1.1.4 Chase Tracking Proprietary Limited
- 1.1.5 IFS Holdings Proprietary Limited
- 1.1.6 Ignition Digital LLC
- 1.1.7 Ignite Training Academy Proprietary Limited
- 1.1.8 MVNX Proprietary Limited
- 1.1.9 Me and You Mobile Proprietary Limited
- 1.1.10 Mobius Mobile Telecommunications Proprietary Limited
- 1.1.11 Viva Life Insurance Limited; and /or
- 1.1.12 Viva Cover Proprietary Limited

1.2 With our headquarters in Durban, South Africa, we are a global customer acquisition business, operating in the Telecommunications, Home Services and Financial Services sectors. You can find out more about the Ignition Group on our website at [www.ignitiongroup.co.za](http://www.ignitiongroup.co.za).

## 2. DEFINITIONS

- 2.1 **Cookies** are a small amount of data generated by a website and saved by your web browser. Its purpose is to remember information about you.
- 2.2 **CI/CD** means Continuous Integration and Continuous Delivery. Continuous integration is a coding philosophy and set of practices that drive development teams to implement small changes. Continuous delivery picks up where continuous integration ends. CD automates the delivery of applications to selected infrastructure environments.
- 2.3 **Data** means Personal Data, Usage Data, Cookies as well as Location Data.
- 2.4 **Data Controller** means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which, and the manner in which any Personal Data is, or are to be, processed. For the purposes of this Privacy Statement, we are a Data Controller of your Personal Data.
- 2.5 **Data Processors** means any natural or legal person who processes the Personal Data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your Personal Data more effectively.
- 2.6 **Data Subject** means the person to whom the personal information relates to.
- 2.7 **GPS** (Global Positioning System) GPS navigation involves multiple satellites in the Earth's atmosphere transmitting signals to devices that can then determine their current location on the ground. Almost all smart devices (mobile phones, tablets, laptops) can connect to the GPS. We may use geotags to improve our cybersecurity and improve our data encryption methods.
- 2.8 **Offering** means the products or services accepted by the User and provided by the Ignition Group.
- 2.9 **Personal Data** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –
  - 2.9.1 Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - 2.9.2 Information relating to the education or the medical, financial, criminal or employment history of the person;
  - 2.9.3 Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - 2.9.4 The biometric information of the person;
  - 2.9.5 The personal opinions, views or preferences of the person;
  - 2.9.6 Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 2.9.7 The views or opinions of another individual about the person; and/or
  - 2.9.8 The name of the person if it appears with other Personal Data relating to the person or if the disclosure of the name itself would reveal information about the person.
- 2.10 **Pseudonymisation** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific person without the use of additional information.
- 2.11 **Service Providers** means any third-party company or individual used by the Ignition Group to facilitate our Service, improve a Platform or add value to an existing Offering or provide additional products and services to you.
- 2.12 **Usage Data** is data collected automatically either generated by the use of an Offering or from the website infrastructure itself (for example, the duration of a page visit).
- 2.13 **The User** is the individual using the Offering or accessing the Ignition Groups platforms (via our websites, over the telephone, on our mobile applications or otherwise ("Platforms")). The User corresponds to the Data Subject.
- 2.14 **Website** being our main website at [www.ignitiongroup.co.za](http://www.ignitiongroup.co.za), and any of our subsidiary company websites.

## 3. WHAT INFORMATION WE COLLECT

- 3.1 We will need to ask you for and obtain from you, Personal Data to give you the best possible experience when you engage on any of the Platforms and when you make use of our Offerings.
- 3.2 This may include but is not limited to your full name, unique identification number, physical and postal address, debit order details, e-mail address and telephone number; IP addresses, zip or postal codes, usernames and passwords and/ or any other related content, products viewed, subscription history, pages visited, links opened, and similar information may be stored automatically on our Platforms.
- 3.3 If you subscribe to our mailing lists for the latest news and other information, you will be asked to specify the areas in which you are interested so that we can tailor the information which we send to you to cover these topics of interest. We also collect information from you when you register on any of the Platforms, place an order, abandon cart or subscribe to our newsletter.

## 4. HOW WE USE YOUR INFORMATION

- 4.1 We use your Personal Data to fulfil any of your requests, make our Offerings as effective as possible, to suit your needs and to let you know about new products and services.
- 4.2 In addition, we also:
  - 4.2.1 Provide you with information about goods and/or services you have requested;
  - 4.2.2 Let you know about major changes to our products and services;
  - 4.2.3 Provide and improve customer care and support procedures;
  - 4.2.4 Update internal customer records;
  - 4.2.5 Improve our products and services;
  - 4.2.6 Evaluate the effectiveness and efficiency of our marketing for research, training and statistical analysis with the aim of improving our services;
  - 4.2.7 Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection and processing of payments;
  - 4.2.8 Where applicable, provide you with access to your credit information;
  - 4.2.9 Contact you for market research purposes;
  - 4.2.10 Use your Personal Data for reporting or analytical purposes;
  - 4.2.11 Monitor the usage of our Offering;
  - 4.2.12 To fulfil any other purpose for which you provide it;
  - 4.2.13 Ensure that our transactions are, auditable, traceable and secure and retain information which is required by law or from a regulatory perspective; and/or
  - 4.2.14 Perform data destruction on your Personal Data in line with POPIA, GDPR or CCPA, as required.
  - 4.2.15 **Save for instances envisaged in clause 13.4 below, we will not use your Personal Data for any other purpose other than for which you have selected or in relation to the Platform or the provision of services by our Service Provider; or sell, transfer or disclose your Personal Data to any third party without your express consent.**

## 5. DIRECT MARKETING

- 5.1 We may tell you about our exclusive offers, products and other information which we think you may be interested in.
- 5.2 **You may opt out of such marketing at any time.** you can do this either through a link you will find on the Platform relating to your product or service; or you may amend or remove your preferences by selecting the unsubscribe option on any mail that we send you and update your preferences.
- 5.3 We may contact you with marketing information by using your Personal Data or with targeted advertising delivered online through social media and platforms operated by other companies using their profiling tools or use your Personal Data to tailor marketing to improve its relevance to you, unless you object.

## 6. SPECIFIC PRODUCT AND/OR SERVICES

Some products and services constituting the Offering may have a privacy policy/ statement specific to that product or service which needs to be read in accordance with this Privacy Statement.

## 7. COOKIES

Our Platform uses cookies to keep track of your visits and activity on the Platform. **For information related to the use of cookies, please see our Cookie Policy which you will also find on this website.**

## 8. USAGE DATA

- 8.1 We may also collect information that your browser sends whenever you visit our website or Platform or when you access a service by or through any device ("Usage Data").
- 8.2 This Usage Data may include information such as your device Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our products and services that you visit, the pages of other websites and the uniform resource locator ("URL") of such pages, the time and date of your visit, the time spent on those pages, unique device identifiers, URL data for market segmentation purposes and other diagnostic data. It can also collect and process information in terms of the type of device you use, your device unique ID, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

## 9. LOCATION DATA

- 9.1 We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Offering and to add value and to improve and customize our Offering.
- 9.2 **You can enable or disable location services when you use any of our Platforms or make use of our Offering at any time by way of your device settings.**

## 10. SECURITY OF YOUR PERSONAL DATA

- 10.1 We take the security of your Personal Data very seriously and we are committed to implementing leading data security safeguards.
- 10.2 Our online services protect your Personal Data during transit using encryption such as Transport Layer Security (TLS). When your Personal Data is stored by us, we use computer systems with limited access housed in facilities using physical security measures.
- 10.3 All data held by us is kept using encrypted storage.
- 10.4 Please remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Data, we cannot guarantee it's absolute security.

## 11. HOW LONG WE RETAIN YOUR PERSONAL DATA

- 11.1 We will keep hold of your Personal Data for no longer than necessary. The length of time we retain it will depend on any legal obligations we have, (for example if we are required to retain your data to comply with applicable laws) the nature of any contracts we have in place with you or the existence of your consent.
- 11.2 We will use pseudonymisation to retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Offering, or we are legally obligated to retain this data for longer time periods.

## 12. TRANSFER OF DATA

- 12.1 Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.
- 12.2 If you are located outside the Republic of South Africa and choose to provide information to us, please note that we may transfer the data, including Personal Data, to the Republic of South Africa and process it there.
- 12.3 **Your consent to this Privacy Statement followed by your submission of such information represents your agreement to that transfer.**
- 12.4 Ignition Group will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate data protection laws or controls in place including the security of your data and other Personal Data.
- 12.5 We will also purge or delete Personal Data in line with POPIA, GDPR and other regulatory and compliance requirements.

## 13. SERVICE PROVIDERS

- 13.1 We may employ Service Providers to provide Offerings on our behalf, perform Service-related services or assist us in analysing how our Offering is used.
- 13.2 These Service Providers have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- 13.3 These Service Providers are also bound by contract with which has specific obligations related to your Data.
- 13.4 **We may also transfer or on-sell your Personal Data to third parties or Service Providers in a manner compliant with Section 15 of the POPIA, in circumstances where we believe your customer experience may be enhanced.**

## 14. ANALYTICS

We may use third-party Service Providers to monitor and analyse the use of our Offerings.

## 15. CI/CD TOOLS

We may use third-party Service Providers to automate the development process of our Offerings.

## 16. LINKS TO OTHER SITES

16.1 Our Platforms and websites may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. **We strongly advise you to review the Privacy Policy/ Statement of every site you visit.**

16.2 We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## 17. CHILDREN'S PRIVACY

- 17.1 Our Offerings are not intended for use by children under the age of 18 ("Child" or "Children").
- 17.2 We do not knowingly collect personally identifiable information from Children. **If you become aware that a Child has provided us with Personal Data, please contact us in accordance with clause 21 below.**
- 17.3 If we become aware that we have collected Personal Data from Children without verification of parental consent, we will take immediate steps to remove that information from our servers.

## 18. PAIA (PROMOTION OF ACCESS TO INFORMATION ACT)

18.1 The Promotion of Access to Information Act 2 of 2000 is South Africa's access to information law and it enables people to gain access to information held by both public and private bodies. If you would like to review, amend or obtain a copy of your personal information held by the Ignition Group, please review our PAIA manual on how to submit a request.

18.2 **Our PAIA manual is located on this Website.**

## 19. CHANGES TO THIS PRIVACY POLICY

- 19.1 The Ignition Group reserves the right to update or modify this statement, at its sole discretion, at any given time and without prior notice to the User.
- 19.2 This may be done in response to adhering to legislative or regulatory requirements and ever-changing business needs. Unless otherwise stated, the current version of this statement shall supersede and replace any previous versions.
- 19.3 This policy was last updated on **9 September 2022**.

## 20. CONTACT US

**If you wish to update your preferences by email or should you believe that the Ignition Group has utilised your Personal Data contrary to applicable Laws, you undertake to first attempt to resolve any concerns directly with the Ignition Group;**

**Name of Private Body:** Ignition Telecoms Investments (Pty) Ltd  
**Email address:** [dataprivacy@ignitiongroup.co.za](mailto:dataprivacy@ignitiongroup.co.za)  
**Postal address:** PO Box 1611, Century Club, 4301  
**Street address:** Quadrant 4, Centenary Building, 30 Meridian Drive, Umhlanga, Durban  
**Phone number:** +27 31 582 8300

**If you are not satisfied with the outcome of the above process, you have the right to lodge a complaint with the Information Regulator, using the contact details listed below:**

**Phone number:** 010 023 5200  
**Fax number:** 086 500 3351  
**Email:** General enquiries: [enquiries@infregulator.org.za](mailto:enquiries@infregulator.org.za)  
**POPIA Complaints:** [POPIAComplaints@infregulator.org.za](mailto:POPIAComplaints@infregulator.org.za)