

BLUE LABEL TELECOMS LIMITED – PRIVACY NOTICE

Please read this Privacy Notice carefully because it will be binding on you when you continue to interact with Blue Label for any reason and via any communication channel or platform.

1 Our Principles

We are committed to protecting your privacy and ensuring that your personal information is collected, used, disclosed, transferred and retained properly, lawfully and transparently. This Privacy Notice provides a framework for data privacy and protection to our users and customers.

2 Privacy Statement & Purpose

This Privacy Notice explains:

- 2.1 how we collect, use, share and protect (“process”) personal information across Blue Label when you access/ use our websites, mobile applications, social media sites and/or physical distribution sites (“Sites”), interact with us, enquire about, use, purchase and or subscribe for our products and/ or services;
- 2.2 what information we collect about you, how we may use that information, who we may share it with, when we may share it and how we keep it private and secure. It also explains the rights and choices you have in relation to your personal information;
- 2.3 the processing of personal information will be based on your particular interactions with Blue Label, the Sites, the products and services you enquire about, apply for, purchase or subscribe to and how you make use of those products and services, and in line with the choices you make.

3 Important Terms

In this Privacy Notice:

- 3.1 “**Blue Label / we / us / our**” is Blue Label Telecoms Limited and includes our Affiliates;
- 3.2 “**Blue Label Group / Group**” is Blue Label Telecoms Limited, and/or its subsidiaries, affiliates, divisions, and/or holding company/companies, partnerships, joint ventures and associated companies and retail brands (“Affiliates”);
- 3.3 “**personal information**” is any information from which you can be identified as further defined in POPIA and includes without limitation MSISDN (Mobile Station International Subscriber Director Number) information (a unique identifier which is linked to your mobile phone number), location information, call data records, usage information, race, gender, nationality, marital status, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal address, biometric information, and financial, criminal or employment history;
- 3.4 “**POPIA**” is the Protection of Personal Information Act 4 of 2013;
- 3.5 “**Process or processing**” means to any operation or activity, whether automated or not, concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information;
- 3.6 “**products**” include products offered by and across Blue Label Group;

- 3.7 **“Representatives”** is persons from time to time, permanently or temporarily, working under our direction or supervision or engaged by us to render services/ provide products as employee, associate, sub-contractor, operator, strategic partner, service provider, value added services provider, representative and/or agent in relation to our business and, in the case of contractors and/or sub-contractors and/or agents, those contractors’ and/or sub-contractors’ and/or agents’ respective representatives;
- 3.8 **“services”** includes any service offered by Blue Label Group;
- 3.9 references to **“Blue Label, we, us or our”** may include Affiliates within the Blue Label Group; and **“customers”, you or your** refers to users/ customers of Blue Label; and
- 3.10 terms otherwise used in this Privacy Notice which are defined in POPIA will have the meanings given to them therein.

4 **Blue Label - Who are we**

- 4.1 We are Blue Label Telecoms Limited, Company Registration No: 2006/022679/06. Our registered office is 75 Grayston Drive, Morningside Extension 5, Sandton, South Africa. We are registered with the Information Regulator as a Responsible Party.
- 4.2 We are the holding company of the Blue Label Group. On occasion we add new brands and companies into our Group and this Privacy Notice will extend to those new acquisitions. A simplified structure of the Blue Label Group and its Affiliates and businesses is listed in our annual integrated report.

5 **What do we do - The Blue Label Group**

- 5.1 Blue Label conducts business via a number of Affiliates forming the Blue Label Group.
- 5.2 Blue Label is a leading digital distribution company, seamlessly connecting people with essential products and services. We specialise in prepaid solutions, virtual goods and value-added offerings, making them readily available to the mass market.
- 5.3 Through our various product and service offerings, Blue Label Group seeks to provide client-led, digitally enabled lifestyle and related products and services covering your mobile, entertainment, connectivity, leisure and financial needs These include mobile products/services, mobile content, utilities, service advances, event, ticketing and transportation products and services, insurance products, data services and marketing services.
- 5.4 These products/services may include integrated solutions, be similar in nature and/ or related between the respective brands and Affiliates and may be offered to you from time to time interchangeably, if you have agreed to receive communication from Blue Label.
- 5.5 Protecting the privacy, confidentiality and security of your personal information is very important to us to maintain your trust and to act in the right way to meet your needs. We have therefore implemented Group wide policies and procedures and a binding set of Group rules to ensure that your personal information is lawfully processed and protected.
- 5.6 Personal information processed by Affiliates may be considered data of the Group. This Privacy Notice sets out the basis on which personal information is processed by the Group as a minimum standard. Unless otherwise specified in a separate privacy policy or supplemental terms, the way your personal information is processed will remain compatible with this Privacy Notice.
- 5.7 Affiliates and/ or particular products and/or services may require additional notifications in regard to privacy

and these will be set out on the Site of particular Affiliate and will apply as supplemental to this Privacy Notice.

5.8 Affiliates may have their own privacy policies tailored to their specific products and services which will apply and can be found on their websites.

5.9 We may combine your personal information, available across the Group, and use combined information for any of the purposes set out in this Privacy Notice where we have lawful grounds for doing so.

6 **Scope & Application**

6.1 This Privacy Notice will apply when you access our Site, interact with us in any manner and / or provide us with your personal information using a Site and/ or other communication channel and/ or when you enquire about, apply for and/ or purchase or subscribe for our products/ services.

6.2 When you engage with us, you acknowledge that we may require your personal information and may need to process such personal information to provide products or services to you, to confirm, update and enhance our records, to confirm your identity and additional purposes linked to specific products and services.

6.3 By continuing to interact with us, you indicate that you agree to this Privacy Notice and authorise us and the relevant Representatives to process your personal information in terms of this Privacy Notice.

6.4 This Privacy Notice applies to all personal information provided, collected and/ or received, including from third party providers, including Affiliates and Representatives.

6.5 This Privacy Notice must be read together with and is incorporated in our User Terms, the relevant product and service terms and conditions, any other relevant legal notices or terms and conditions provided or made available to you on a Site or otherwise.

7 **How to Contact Us**

Your opinion matters to us so if you have any questions about this Privacy Notice please submit your query to the Privacy Officer at Email: privacy@blts.co.za.

8 **What types of personal information do we collect**

8.1 We may collect a several of types of personal information for the purposes stated in this Privacy Notice.

8.2 The personal information we collect about you can vary depending on: the type of products or services that you enquire about, apply for, purchase, use and/ or subscribe to; your use of such products/ services; registration for rewards programmes; online browsing behaviour; competition entries; connection with us on social media; your interactions with Blue Label (even if you aren't a customer); and/or what we have obtained from a third party. Specific details relating to personal information collected may apply and may be found on the Site of the Affiliate that you are engaging with.

8.3 Generally, personal information collected across Blue Label includes:

8.3.1 **Contact Details:** name, physical and email address, phone and/or mobile number, alternative contact details, information about your property or household, utility numbers. Where you provide us personal information of a third-party (for example your spouse or family member), you guarantee that such third-party has given you consent to share their personal information. Where you share personal information of a person under 18 years, you confirm that you have the necessary legal

authority or legally competence to do so.

- 8.3.2 **Enquiry/Application Information:** information given by you in enquiry forms and applications for products / services.
- 8.3.3 **Contract Information:** purchase or other commercial information related to a contract you conclude with us, our service providers and/ or strategic partners.
- 8.3.4 **Payment information:** payment methods and payment information, information about your bank account and other banking information. For example, when need to process payment if you make a purchase or for debit orders.
- 8.3.5 **Profile Information:** purchase, and preference information, contractual performance, financial behaviour, goals and needs. Interaction with other Group Affiliates, offers you have shown an interest in and/or product or services review information.
- 8.3.6 **Choices:** your choices, permissions and consents.
- 8.3.7 **Demographic Information:** age, identifying numbers, birthdate, gender, marital status; postal code, your status as a customer, and other related information about you.
- 8.3.8 **Communications:** communications and interactions, including e-mail messages, chat sessions, text messages, and phone calls that we and/or our Representatives exchange with you. Notes or recording of calls to contact centres, a Live Chat, an email or letter sent, or other records of any contact with us. Call recordings, including information about calls and what information is exchanged.
- 8.3.9 **Engagement:** nature of engagements with us including use of products and services, transactions, requests, queries and complaints.
- 8.3.10 **Resource Data:** details of the resources that you access to visit our website (for example, URL addresses, traffic data etc.).
- 8.3.11 **Device Data:** information about the type of device you have used to visit our website, your device settings, and the cause of any system errors. Your device manufacturer or operating system provider will have further details on what information your device makes available.
- 8.3.12 **Location Information:** location or geolocation information of your device, should your device settings allow us to collect location information.
- 8.3.13 **Account information:** dates of payment owed or received, subscriptions you use, account numbers or other information related to our products and services.
- 8.3.14 **Credential information:** passwords, hints and similar security information used for authentication and access to products and services.
- 8.3.15 **Preference Information:** for particular products, services and activities when you tell us what they are, or we assume what they are, based on how you engage with Blue Label.
- 8.3.16 **Employment Information:** company details, occupation, salary date and gross monthly income to indicate source of income and the ability to qualify for / fulfil contractual arrangements.
- 8.3.17 **Browsing and other Internet activity information:** online identifiers and your online behaviour,

such as cookies and IP addresses. Information about your device and online browsing activity.

- 8.3.18 **Traffic Information:** mobile phone use information. This may include the number you called or sent an SMS or MMS to, the length, date and time of that call, SMS or MMS, the amount of data you are using and your approximate location at the time that the communication takes place. We don't keep records of the content of your calls or messages.
- 8.3.19 **Data sessions:** a history of the sites you visit. This is to enable connection to be made and for billing purposes, fraud investigations, network and store planning, campaign planning, marketing specific products such as URL bundles, identify visits to competitor websites, and personalisation of services. To be able to provide detailed data usage, we aggregate data used and report per category of usage.
- 8.3.20 **Photographs and images:** when attending any of our events or functions or accessing premises with surveillance cameras.
- 8.3.21 **Biometric information:** fingerprints and images for identity verification, security and fraud prevention.
- 8.3.22 **Third Party Information:** information we get from other sources, credit agencies, fraud-prevention agencies, and from other data providers. This includes demographic data and interest-based data.
- 8.3.23 **Service Levels:** levels of service that you receive from us or our Representatives.
- 8.3.24 **Usage Information:** Details of your use of the specific services or products.
- 8.3.25 **General:** Any other form of personal information that we may reasonably require to offer products or services to you. Inferences about any of the information above that may relate to your preferences, or other matter. Internal reports and other derivative data based on the personal information we collect.
- 8.4 We use cookies and similar technologies to provide us with information about your usage of our Sites, to support our functionality and to give you the best possible on-line experience. Read below to learn more.
- 8.5 You can refer to the specific privacy supplement for each product/service for more information on the data processed.
- 8.6 If we link information that does not personally identify you with your personal information the linked information will be treated as personal information.
- 8.7 If you are a third-party service provider, we may collect personal information about you as the data subject in order to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other person such as shareholders, employees or your directors, you are authorised to share their personal information with us for purposes set out in this Privacy Notice.

9 **How do we collect your personal information**

- 9.1 We may collect personal information directly from you or obtain it from other sources where lawful and reasonable, such as reputable third parties that you deal with or that Blue Label interacts with for the purpose of conducting its business.
- 9.2 Where we collect information and how we collect it will depend on how you interact with us and which

products and/ or services you purchase and/ or use.

9.3 Third parties may include:

- 9.3.1 business partners and strategic partners (including partners and participating partners involved in reward programmes, value added services, campaigns or other business activity, joint venture partners, social media and platform partners) or companies we may acquire or that merge with us;
- 9.3.2 affiliates in the Group;
- 9.3.3 service providers (including payment processors, card network providers, debt collection and tracing agencies, credit agencies, data bureaus, couriers, cloud hosting services, electronic communications service providers, public and private data and data verification providers, including data registries, aggregators, search engines, social media and marketing list providers);
- 9.3.4 employers, advisors, agents, associates, cessionaries, successors in title, trustees, executors, curators and appointed third parties (including lawyers and contractors);
- 9.3.5 government departments, regulatory authorities, courts of law, law enforcement agencies, ombudsmen and tax authorities;
- 9.3.6 publicly available sources;
- 9.3.7 fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies, from other data providers, connected network providers, our Representatives, and third parties which take payments and manage product orders and dispatch orders; and
- 9.3.8 other commercially or publicly available sources.

9.4 Directly from you

Generally, personal information may be collected directly from you when you:

- 9.4.1 enquire, apply for sign up to any products / services, including value added services;
- 9.4.2 subscribe to newsletters, alerts or other services or take part in a competition, prize draw or survey, participate in a rewards / loyalty scheme or take part in market research;
- 9.4.3 contact us through various channels, including customer care, for support or ask for information about products or services and/ or interact with our Representatives or Affiliates;
- 9.4.4 visit or browse Bue Label Sites and/ or create an online profile on our e-commerce platform(s) or download one of our apps;
- 9.4.5 where you are an employee or a prospective employee who registers on our career portal and submit your curriculum vitae;
- 9.4.6 otherwise interact with us.

9.5 From third parties (Information collected not directly from you)

- 9.5.1 We may collect or obtain personal information third parties in a number of circumstances, including, when you have given permission to third parties, where your information is publicly available; where

you are the customer of a business that we acquire.

- 9.5.2 To ensure your personal information is complete, accurate, not misleading and updated on a regular basis. Where we are unable to do so by getting information directly from you or our practices necessitate it, we will make use of verifiable independent third-party data and verification sources who have the necessary authority to provide us with such information. We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include the third parties referred to above.
- 9.5.3 We may also collect and aggregate personal information across the Group based on your performance and consumer behaviours across the various products and services offered by the Group, their Service Providers and Strategic Partners.

10 **Do you have to share your personal information with us**

In order for us to provide you with products/services we have to collect and process your personal information. This means that the processing of your personal information would be required, and should you not wish for us to do so you will not be able to continue with purchasing/using our products/services.

11 **When we process your personal information**

- 11.1 We will only process your personal information for lawful purposes relating to our business, these include, in any one or more of the following circumstances:
- 11.1.1 where you are an existing customer on our customer database;
 - 11.1.2 where you have purchased a product from us or used our services;
 - 11.1.3 you have made an enquiry and/ or application for a product and/ or service;
 - 11.1.4 where you communicate, interact and/ or transact with us and/ or our Representatives;
 - 11.1.5 where we process payments for you or on your behalf;
 - 11.1.6 where your personal information is held by another member in the Group, and you have agreed to the processing thereof by the Group;
 - 11.1.7 if, where required, you have consented thereto;
 - 11.1.8 if you have not requested that we refrain from processing your personal information;
 - 11.1.9 if a person legally authorised by you, the law or a court, has consented thereto;
 - 11.1.10 if it is necessary to conclude, perform or enforce a contract or agreement with you for a product / service that you have applied for either with us or through our business partners with whom we have entered into a partnership, collaboration or alliance relationship;
 - 11.1.11 if the processing is for statistical, analytical or research purposes;
 - 11.1.12 if the law requires or permits it; and/or
 - 11.1.13 if it is required to protect or pursue your, our or a third party's legitimate interest.

- 11.2 We may process your special personal information in any one or more of the following circumstances:
- 11.2.1 if you have consented to the processing;
 - 11.2.2 if the processing is needed to create, use or protect a right or obligation in law;
 - 11.2.3 if the processing is for statistical or research purposes and all legal conditions have been met;
 - 11.2.4 if the special personal information was made public by you;
 - 11.2.5 if the processing is required to identify you; and/or
 - 11.2.6 if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

12 How we use your personal information and lawful basis to do so

- 12.1 We will use your personal information for a number of purposes ranging from enabling us to provide you with the products or services you have requested to ensuring we are keeping these secure from fraud. This will depend on how you engage with us, the type of products/services you are searching for, purchase or use.
- 12.2 We may use Artificial Intelligence (A.I.) to help us provide you with a requested product or service. If we use A.I. we will do so responsibly, and where necessary we will disclose that the content is generated by A.I.
- 12.3 Whenever we use your personal information, we do so based on a specific lawful bases in compliance with POPIA listed below:
- 12.3.1 **Your Contract:** If you contract with us for products/services, we need to use personal information to provide the products /serviced. This includes for performance of a contract you have concluded with us or to enter into a contract (including legibility and checks) and to take action on your requests, implement and enforce the contract. We also use this basis for processing some of our employee information.
 - 12.3.2 **Blue Label legitimate business interests:** POPIA allows personal information processing where necessary for legitimate purposes without undue adverse impact. Blue Label may process your personal information in the regular management and operation of its business and to protect the interests of the Group and its customers, shareholders, employees and other third parties, including our business partners and members of the general public, we base a number of our processing activities on the 'legitimate interests' condition. These include fraud prevention, prevention of tax evasion and financial crime, maintaining the security of our network and services, direct marketing, and the assessment and improvement of our products and services, development of new products and services, Group business and integration, and as further described below. When we rely on our legitimate interests, we assess our legitimate interests to make sure they do not outweigh your rights. Additionally, in some cases you have the right to object to this processing.
 - 12.3.3 **Protecting your legitimate interests:** For example, providing notifications regarding product and service availability and performance, notification of emergency services, fraud prevention.
 - 12.3.4 **Compliance with a mandatory legal obligation or our legal rights:** Including where necessary to comply with the law, regulatory body or a legal process served on us, comply with requests for information from police or government authorities, protect and defend our rights or property

(including the enforcement of agreements), protect the public interest, act in urgent circumstances to protect the personal safety of our employees or members of the public.

12.3.5 **Your Consent:** Where applicable laws require it, we will seek your consent. Where you have given your consent, we may rely on consent to process personal information where we do not rely on another legal basis. You can change your mind about your consent at any time.

12.4 In general, we may use your personal information for the following reasons but always in line with our business and the purpose for which it is collected:

12.4.1 to enable the conclusion, implementation and enforcement of transactions you enter into with us or our Representatives for products and services;

12.4.2 for processing an enquiry and/ application for products/ services;

12.4.3 to respond to your enquiries and/or complaints;

12.4.4 to process returns and/or refunds;

12.4.5 to provide information about products and/or services you have requested and notifying you about important changes or developments to these products and/or services;

12.4.6 to follow-up as part of our customer care process;

12.4.7 to update your records on our customer database and internal records and that of the Group;

12.4.8 to administer offers and transactions we make and/or enter into with you;

12.4.9 to improve our Sites, products, services and/or distribution channels;

12.4.10 to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and/or rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;

12.4.11 sending marketing and other communications with the latest specials, deals, alerts, notifications and promotions in relation to our business, products and services, for marketing those products and services and to market related products, goods and services to you;

12.4.12 to develop, test and improve products and services for you and making our services or those of our strategic partners and/or service providers easier for you to use;

12.4.13 to detect, prevent and report theft, fraud, money laundering and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information or avoiding liability by way of deception;

12.4.14 to enforce and collect on any agreement when you are in default or breach of the agreement terms and conditions, for the purposes of tracing you or to institute legal proceedings against you;

12.4.15 to contact you for market research purposes in relation to our business or the business of the Group and to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services;

12.4.16 evaluating the effectiveness of our marketing and for the purpose of research, training and statistical

analysis;

- 12.4.17 for historical, statistical and research purposes, such as market segmentation;
- 12.4.18 to record and/or assist appointed payment processors to process instructions payment instructions (i.e. debit order or EFT;
- 12.4.19 to manage and maintain your relationship with us;
- 12.4.20 to enable us to deliver products, services, documents or notices to you;
- 12.4.21 for security, identity verification and to check the accuracy of your personal information;
- 12.4.22 to communicate with you and carry out your instructions and requests;
- 12.4.23 for customer satisfaction surveys, promotional and other competitions;
- 12.4.24 to enable you to take part in customer loyalty reward programmes, to determine your qualification for participation, earning of reward points, determining your rewards level, monitoring your buying behaviour with our rewards partners to allocate the correct points or inform you of appropriate products, goods and services you may be interested in or to inform our reward partners about your purchasing behaviour;
- 12.4.25 to provide you with tailor-made offerings, we will use your information for data analysis. This is when we use your information to identify your buying patterns, interests and other characteristics to determine what type of services and products we can offer you or how we can change our processes to give you a better customer experience. We may also use credit bureau data for this purpose;
- 12.4.26 to manage your employment relationship or potential employment relationship with us;
- 12.4.27 to enable you to take part in and make use of Value-Added Service;
- 12.4.28 to test changes to various IT systems, applications and for the purposes of training;
- 12.4.29 to manage our supplier relationships;
- 12.4.30 to the extent necessary in terms of Occupational Health and Safety laws, in relation to your presence at our premises;
- 12.4.31 to build a picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the business and third parties to enable us to remarket to you and to similar audiences;
- 12.4.32 to create an accurate profile of you and your activities within the Group (sometimes referred to as enhancement) to ensure information we have is consistent and correct across the Group and to inform the Groups decision making processes and business development.
- 12.4.33 to create a record of enhanced Data about you for third parties where you have consented to the access, use and exchange of such Data with the third party.
- 12.4.34 checking whether you qualify for our products and services, rewards or other value-added services, promotions and offers. We may also use automated systems to analyse your information so we can make fair and objective decisions about whether you are eligible for our products and services;

- 12.4.35 for internal management and management reporting purposes, including but not limited to conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis;
- 12.4.36 using your personal information for further specific purposes made clear at the point of collection on particular pages of our Site, when you complete our product/service agreements, consent forms, credit verification documents and/or when you download any of our Site; and/or
- 12.4.37 for any other related purposes.
- 12.5 We may record details of your interactions with us, including emails, telephone conversations, live chats, and any other kinds of communication as part of our operations in line with legislation. We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions, such as information about the devices or software that you use.
- 12.6 Without limiting or rights, it is noted that we have a legitimate interest to:
- 12.6.1 process your personal information for us to promote our business, brands, products and services;
- 12.6.2 to contact you with information about our products and services once you have made an enquiry at which point you may be listed as a Blue Label customer or after we presented you with an option to opt-in (e.g. using a tick box on an application). This may, where appropriate include products and services from other Group Affiliates;
- 12.6.3 to deliver tailored advertising (including via social media);
- 12.6.4 to personalise our marketing communications based on your attributes/profile;
- 12.6.5 to administer and monitor our Sites, including to ensure that content is presented in the most effective manner for you and for your device, and to allow you to participate in interactive features when you choose to.

13 **Do we share your personal information**

- 13.1 In general, we will only share your personal information if any one or more of the following apply:
- 13.1.1 if the law requires or allows it;
- 13.1.2 if, where necessary, you have consented to this (including consent given to a third party);
- 13.1.3 if it is necessary to conclude or perform under a contract, we or our strategic partners, promoters, VAS providers and/or clients have with you;
- 13.1.4 you have specifically consented to sharing your personal information during an interaction or transaction through our distribution channels or other communication channel; and/ or
- 13.1.5 if it's necessary to protect or pursue your, our or a third party's legitimate interest.
- 13.2 **Third Parties we work with**
- 13.2.1 When you've purchased Blue Label products and services using a third party or partner

organisation, we often need to exchange information with them as part of managing that relationship and your account – for example, to be able to identify your order and be able to pay them.

- 13.2.2 If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, they may have access to your personal information. We don't authorise them to use or disclose your personal information received from us except in connection with providing their services.
- 13.2.3 We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services. We provide this information to third parties (for example, to content providers and advertisers), but any such third-party reporting shall not include information which may identify an individual customer.
- 13.2.4 Where you buy a third-party product or service through your Blu Label account, the contract for it is with the party selling that product or service. Blue Label may only charge the amount to you as part of its arrangements with the seller. As part of this, you're agreeing that Blue Label may pass certain personal information to the seller to complete your purchase with them.
- 13.2.5 The seller's terms and conditions, privacy and cookies policies will apply to how it uses your personal information – please read them carefully.
- 13.3 Who we share your personal information with will depend on the products / services you purchase/ use and also depending on the Representatives and third parties we may use to assist in service delivery for the products / services. These may include:
 - 13.3.1 service providers, partners, suppliers, or agents involved in delivering the products and services you've ordered or used;
 - 13.3.2 companies who are engaged to perform services for, or on our behalf or the Group's behalf, or any of their service providers, partners, suppliers, or agents;
 - 13.3.3 credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies;
 - 13.3.4 debt collection agencies or other debt-recovery organisations;
 - 13.3.5 law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
 - 13.3.6 a third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
 - 13.3.7 emergency services (if you make an emergency call), including your approximate location;
 - 13.3.8 third parties for joint promotions with that third party or for contacting you about their specific products and services. They'll be responsible for their own compliance with applicable privacy laws. Where required, we will ask for your consent before sharing this information;
 - 13.3.9 other third parties when you are signing up to their service and it is used by them for authentication and fraud-prevention purposes;
 - 13.3.10 third parties that we advertise with, in order to serve you advertisements online (e.g., Facebook, Google). You can opt-out of this by managing your account permissions. To do this see the 'Your

- Rights' section in the policy;
- 13.3.11 third parties that we use to serve you marketing;
- 13.3.12 Representatives and other duly appointed service providers;
- 13.3.13 other members of the Group for any of the purposes identified in this Privacy Notice;
- 13.3.14 any of our associates, cessionaries, delegates or successors in title or duly appointed third parties. such as its authorised agents, advisors, partners, service providers and contractors for any of the purposes identified in this Privacy Notice;
- 13.3.15 our employees in their performance of their duties;
- 13.3.16 attorneys and other persons that may assist with the enforcement of agreements;
- 13.3.17 payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, such as card scheme providers;
- 13.3.18 law enforcement and fraud prevention agencies and other persons tasked with the prevention and/or the prosecution of crime;
- 13.3.19 regulatory authorities, industry ombuds, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with;
- 13.3.20 the general public where you submit content to our social media sites like our Facebook page;
- 13.3.21 participating partners in our customer loyalty reward programmes, where you purchase products and services or spend loyalty rewards;
- 13.3.22 our joint venture and other partners with whom we have concluded business arrangements;
- 13.3.23 to manage and operate your payment accounts i.e. sending you communication;
- 13.3.24 to process your information for the express purpose of conducting analytics and to develop insights;
- 13.3.25 in addition to our own internal data analytics activities, with services such as those offered by Google, Facebook, Instagram and other similar social media platforms to better tailor our marketing communications and for targeted advertising. As part of this process, some personal information, such as your e-mail address, is provided to the relevant third party, however for security purposes this data is "hashed" prior to being shared. Hashing is a process of identity masking or "pseudonymisation" which means we do not disclose your e-mail address but this still enables linking between your social media presence and our records;
- 13.3.26 with our strategic partners with whom we collaborate to enhance existing product offerings as well as to develop new products to ensure that you always receive the best products and services that we and our commercial partners have to offer;
- 13.3.27 to provide you with targeted Blue Label or third party offers, promotions, adverts, or commercial communications if you have opted in to receiving relevant marketing communication.
- 13.4 If we reorganised or merged with or divested part of our business to another organisation, we may need to provide your information to that other organisation or their advisers or receive personal information from

that other organisation.

- 13.5 Where we share your information with service providers, strategic partners, agents and operators and other third parties, we conclude agreements (where possible) to ensure that your personal information is only used for the purpose for which we collected it from you. These persons have an obligation to keep your personal information secure and confidential.
- 13.6 Where you have consented to sharing Data, including Personal Information about your interactions with the Group with third parties, we may share your Data, including your Personal Information, with the third parties to whom you have given consent and in line with the purposes for which the consent was given. This particularly may include (without being limited to) aggregated and enhanced Data to inform decision making processes. **Where you consent to a third party accessing Data about you from the Group, then you shall not have a claim against us for sharing that Data, provided we share it according to the consent given.**

14 **How we secure your personal information**

- 14.1 We will take all reasonable and appropriate technical and organisational steps to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, misuse, unauthorised disclosure, loss, interference, destruction or damage, alteration, disclosure or access.
- 14.2 Our security systems are in line with industry standards and we monitor developments to ensure that our security systems evolve, as required. We also test our systems regularly.
- 14.3 We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
- 14.4 We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.
- 14.5 Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your personal information on their site. The same applies to any third-party websites or content you connect to using our products and services.
- 14.6 You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.
- 14.7 Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.
- 14.8 In the unlikely event of such access, we will notify you within a reasonable time of us becoming aware of such occurrence.
- 14.9 Notwithstanding the above, no data transmission over the Internet or data storage system can be guaranteed to be completely secure. Please do not send us sensitive information through email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us to privacy@blts.co.za.
- 14.10 Where storage is in another country, your personal information will be stored in a jurisdiction that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject

to an agreement requiring it to observe data protection requirements equivalent to or better than those applicable in South Africa.

15 **How long we keep personal information**

We keep personal information for as long as is necessary:

- 15.1 to fulfil the purpose(s) of its provision,
- 15.2 to comply with applicable laws, regulatory requirements, and the resolution of disputes or fraud prevention;
- 15.3 to fulfil contractual requirements and for so long as customer service periods require; and
- 15.4 for as long as your consent to such purpose(s) remains valid after termination of our relationship.

16 **Cookies and similar technologies**

- 16.1 Blue Label uses cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website). This, in turn, helps us make our website relevant to your interests and needs. They also help us find information once you have logged in or help us link your browsing information to you and your personal information, for example, when you choose to register for a service. We may use a persistent cookie (a cookie that stays linked to your browser) to record your details so we can recognise you if you visit our website again.
- 16.2 These technologies collect information that your browser sends to our Sites including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click on.
- 16.3 Cookies that track your preferences during your visits to our websites which enables us to simplify navigation, by using Google Analytics (which is a web-analysis tool from Google Inc). This allows us to ensure that the content of our websites remain up to date and comprehensive. The information that is used during this process (which includes your IP Address) is de-identified and makes personal identification impossible. We own and retain all rights to de-identified statistical information collected and compiled by us. We also make use of first-party and third-party cookies, as well as web beacons and similar technologies to deliver measurement services and targeted advertising to our website visitors. Cookies may include Google Analytics cookies, a Google Ads cookie, and a Facebook Event Tracking cookie. Cookies help us to provide you with a better online experience, by enabling us to monitor which pages you find useful or not. A cookie does not give us access to your computer or any of your personal information, other than that which you choose to share with us. You may at any time decline cookies in your web browser settings, but this may prevent you from using the full functionality of our websites. For more information on the use of Google Analytics, please visit <https://policies.google.com/technologies/partner-sites> For detail regarding the information Google collects and how it is used to deliver targeted advertising, please visit <http://www.google.com/policies/privacy/ads/>.

17 **Automated Decision-Making and Artificial Intelligence (AI)**

- 17.1 We may utilise Artificial Intelligence (AI) and automated decision-making processes to enhance the quality and efficiency of our services, assess risks, personalise user experiences, and improve operational effectiveness. These automated decisions may involve the analysis of your Personal Information.
- 17.2 We ensure that any automated decisions or AI-driven processes comply with POPIA and are used responsibly. Where automated decisions significantly impact your rights or personal circumstances, we will, upon request therefore:

- 17.2.1 Provide transparency regarding the logic and criteria involved in the decision-making process;
- 17.2.2 Allow you the right to request human intervention;
- 17.2.3 Provide mechanisms for you to challenge or express concerns regarding automated decisions.
- 17.2.4 If you have any questions regarding automated decision-making processes or the use of AI concerning your personal data, please contact our Information Officer at privacy@blts.co.za.

18 **Marketing and tailoring our service to you**

- 18.1 We process your personal information for marketing and advertising purposes, such as to let you know about new products or services and send you special offers, as well as to help us tailor our service to you.
- 18.2 You can control your marketing permissions and the data we use to tailor these communications at any time [see “Your Rights & Choices “below]
- 18.3 As our customer, we will keep you informed generally about new products and services, send you newsletters or white papers, invite you to participate in a survey or let you know about offers, promotions, prize draws or competitions. We tailor these messages based on the sorts of products and services you’ve bought from us.
- 18.4 We may send you direct marketing communications about our products and services or our Affiliates products and services as well as new products, promotions, special offers and other information, including those offered in partnership with our strategic partners. We will contact you by post, online, phone or push notifications through our apps and Sites.
- 18.5 If you have given your permission, we will also contact you to let you know about products and services of other companies that are not same/similar to the products and services that you have bought and those of other companies which we think may interest you depending on your marketing preferences.
- 18.6 **Personalised/targeted advertising online**
 - 18.6.1 To deliver advertising that is relevant to you, you’ll also see targeted advertising online based on the use of cookies. This is known as interest-based advertising. It can be on Sites belonging to Blue Label, those of other organisations as well as other online media channels such as social media sites. We may also combine data collected via the cookies with other data we have collected. If you don’t want any information processed through the use of cookies, check our cookies section. It explains how to control and opt out of cookies.
 - 18.6.2 Not providing consent for interest-based advertising won’t stop advertisements from being displayed but they won’t be tailored to your interests.

18.7 **Research and analytics**

- 18.7.1 We use a variety of analytics methods including what is commonly referred to as “Big data analytics”. Big data analytics are mathematically driven analysis techniques on large and varied data sets (that is why it is “big” data) to uncover hidden patterns and trends. At Blue Label we take governance of big data analytics seriously. Our data scientists are required to sign up to a Code of Ethics. We have a strict use case process that requires that privacy and data protection law checks are carried out before any use case commences. We have strict rules for anonymisation and de-identified techniques where appropriate.
- 18.7.2 We use our analytics to:
 - 18.7.2.1 Create a customer profile as a single view of you as a Group Customer;

- 18.7.2.2 market research and to carry out research and statistical analysis including to monitor how customers use our networks, products and services on an anonymous or personal basis;
- 18.7.2.3 frame our marketing campaigns and determine how we might personalise those;
- 18.7.2.4 provide reports to third parties (such reports don't contain information which may identify you as an individual). These can be to third parties such as content providers and advertisers or as part of Blue Label.
- 18.7.2.5 Create predictive reports for third parties where you have consented to the third party obtaining personal information from us.
- 18.7.3 When you accept or are deemed to have accepted this Privacy Notice by continuing to engage with us, you may be included in the Blue Label customer base as a customer of Blue Label, as part of the Group. You will receive marketing on this basis as well as on the basis of our legitimate interests.
- 18.7.4 When you opt-in to Blue Label marketing, you are opted-in to all of our Affiliates' brands and channels.
- 18.7.5 You may opt-out of receiving marketing materials from us at any time and manage your communication preferences by:
 - 18.7.5.1 following the unsubscribe instructions included in each marketing communication from us or telling us you want to unsubscribe;
 - 18.7.5.2 sending an email to the sender of the marketing communications;
 - 18.7.5.3 registering on the Do Not Contact list of the Direct Marketing Association of South Africa which can be found on www.dmasa.org;
 - 18.7.5.4 a national opt- out registry operated in terms of the Consumer Protection Act;
 - 18.7.5.5 including your details and a description of the marketing material you no longer wish to receive from us.
- 18.7.6 We will comply with your request as soon as is reasonably practicable.
- 18.7.7 If you elect to opt-out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our products and services which you will be unable to opt-out of.
- 18.7.8 When you opt out at a different Affiliate Site, you are opted-out of that particular Affiliate.
- 18.7.9 When you opt out of particular products or services you are opted-out of those particular products and/ or services.
- 18.7.10 When you opt-out of a particular channel, you are opted-out of that particular channel for that Affiliate brand.
- 18.7.11 In order to opt-out of all Blue Label Affiliates (for all brands and channels), please contact privacy@blts.co.za.
- 18.7.12 **Please note:** You may still receive marketing messages for up to 30 (thirty) days after opting out while we update our records.

- 18.7.13 You may have received marketing from Blue Label even if you're not a customer or have never had contact with us. This is a result of third-party marketing lists which Blue Label may acquire from time to time, stating that you have given permission to be contacted by other organisations. If you've registered with us to opt out of marketing from Blue Label you shouldn't receive such communications. If you still do, we ask that you let us know immediately by contacting the customer care contact listed on our website. This will only stop marketing from us and not stop the third parties from sharing your personal information unless you contact them directly. If you no longer want to receive marketing messages from us, you can elect to opt out of all marketing communications or only selected methods (email, SMS MMS, phone or post).
- 18.7.14 We ask you to inform us when your personal information changes so that we can keep your details up-to-date. You can do so, by contacting Customer Services.
- 18.7.15 We do not provide your personal information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal information commercially available to unaffiliated third parties unless you consent.
- 18.7.16 If we are providing you with products or services, you will also be subject to the specific terms and conditions relating to the product or services and those terms may include additional information as to how we or any of our strategic partners and/or service providers may contact you.
- 18.7.17 If the reason you have given us personal information is to receive marketing or other communications from us, we will continue to provide this information to you unless you ask us not to do so.

19 **Your rights and choices**

- 19.1 It is important to us that you are aware of your rights when it comes to your personal information. You have the following options:
- 19.1.1 **Access:** you can ask us for access to personal information we hold about you.
- 19.1.2 **Correction / Destruction / Deletion:** if the information we hold about you is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained lawfully, you have a right to ask us to correct it or delete it.
- 19.1.3 **Objection to processing:** you may object (on reasonable grounds) to processing your personal information unless legislation provides for such processing.
- 19.1.4 **Objection to direct marketing:** you may object to us using your personal information for direct marketing, and if you do, we will stop.
- 19.2 **Please see Forms in this link which you will need to complete to exercise your rights.**

20 **Where to lodge a complaint**

- 20.1 If you're unhappy with our treatment of your personal information, please contact us so we can investigate.
- Location:** 75 Grayston Drive, Sandton, 2196
- Postal Address:** PO Box 652261, Benmore, 2010
- 20.2 You can also contact our Information Officer or Deputy Information Officer at to privacy@blts.co.za.

20.3 You may complain to the Information Regulator:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: POPIAComplaints@inforegulator.org.za.

Site: www.inforegulator.org.za

21 **Governing Law**

21.1 This Privacy Notice is governed by and construed and interpreted in accordance with the laws of the Republic of South Africa, and you submit yourself to the jurisdiction of the courts of the Republic of South Africa.

21.2 The terms and conditions of this Privacy Notice are severable, in that if any provision is determined to be illegal or unenforceable by any court of competent jurisdiction, then such provision shall be deemed to have been deleted without affecting the remaining provisions of the terms and conditions.

21.3 Our failure to exercise any rights or provision of this Privacy Notice shall not constitute a waiver of such right or provision, unless acknowledged and agreed to by us in writing.

22 **Changes to this Privacy Notice**

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing products and services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this Privacy Notice to describe our new practices. If we do, we will notify you the next time you visit this site or interact with us through any of our other communication channels. We encourage you to check this page regularly. Please see all the history of changes in the section below.

Last updated: April 2025

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