



PRIVACY STATEMENT

PRIVACY STATEMENT

We take your privacy seriously - and protecting your Personal Data is of great importance to us.

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") – which is very similar to POPIA.

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

This Privacy Statement governs your visit to this website and explains how 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.

1. WHO ARE THE IGNITION GROUP AND HOW CAN YOU CONTACT US

- 1.1. When we refer to ("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. MVNX Proprietary Limited
 - 1.1.5. Mobius Mobile Telecommunications Proprietary Limited
 - 1.1.6. IFS Holdings Proprietary Limited
 - 1.1.7. Ignition Digital LLC
 - 1.1.8. Viva Life Insurance Limited
 - 1.1.9. 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 Ignition Group on our website at www.ignitiongroup.co.za.

PRIVACY STATEMENT

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 which 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, and Location Data.
- 2.4. Data Controller means a natural or legal person who (either alone, 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 (Or Service Providers) 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) navigation involves multiple satellites in Earth's atmosphere – transmitting signals to devices which 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 Ignition Group.
- 2.9. Personal Data means information relating to an identifiable, living, natural person, and where it is applicable – to an identifiable, existing juristic person, including, but not limited to:
 - 2.9.1. information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability,

PRIVACY STATEMENT

- 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 which 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. 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).
- 2.11. The User is the individual using the Offering or accessing Ignition Group's Platforms (via our websites, over the telephone, on our mobile applications or otherwise ("Platforms")). The User corresponds to the Data Subject

3. WHAT INFORMATION WE COLLECT

- 3.1. We will need to ask you for certain 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.

PRIVACY STATEMENT

- 3.3. If you subscribe to our mailing lists for the latest news and other information, you will be asked to specify the areas you are interested in so we can tailor the information 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. Any Personal Data or information we request that is not required will be specified as voluntary or optional.

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, 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 our transactions are, auditable, traceable and secure and retain information which is required by law, or from a regulatory perspective; and/or

PRIVACY STATEMENT

- 4.2.14. perform data destruction on your Personal Data in line with POPIA, GDPR or CCPA, as required.
- 4.3. 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 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.
- 5.4. You can also register on the national Do Not Contact list here: <https://www.nationaloptout.org/>

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.

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 your browser sends whenever you visit our website 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 you visit, the time and date of your visit, the time spent on those pages, unique device identifiers 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 customise our Offering.
- 9.2. You can enable or disable location services when you use our Offering at any time by way of your device settings.

10. SECURITY OF YOUR PERSONAL DATA

We take the security of your Personal Data very seriously. Our online services protect your Personal Data during transit – using encryption such as Transport Layer Security

PRIVACY STATEMENT

(TLS). When your Personal Data is stored by us, we use computer systems with limited access housed in facilities using physical security measures.

All data held by us is kept using encrypted storage. 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 its absolute security.

11. HOW LONG WE RETAIN YOUR PERSONAL DATA

- 11.1. We will keep hold of your Personal Data 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. We do not retain Personal Data in an identifiable format for longer than is necessary.
- 11.2. We will also 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 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 the 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

PRIVACY STATEMENT

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. OUR POLICY ON “DO NOT TRACK” SIGNALS:

- 13.1. We honour Do Not Track signals.
We do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites you do not want to be tracked.
- 13.2. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

14. SERVICE PROVIDERS

- 14.1. We may employ third-party companies and individuals to facilitate our Service (“Service Providers”), provide Offerings on our behalf, perform Service-related offerings or assist us in analysing how our Offering is used.
- 14.2. 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.
- 14.3. These Service Providers are also bound by contract - with which has specific obligations related to your Data.

15. ANALYTICS

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

PRIVACY STATEMENT

16. CI/CD TOOLS

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

17. LINKS TO OTHER SITES

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

18. CHILDREN'S PRIVACY

- 18.1. Our Offerings are not intended for use by children under the age of 18 ("Child" or "Children").
- 18.2. We do not knowingly collect personally identifiable information from Children. If you become aware a Child has provided us with Personal Data, please contact us in accordance with clause 20 below. If we become aware we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

19. PAIA (PROMOTION OF ACCESS TO INFORMATION ACT)

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 obtain a copy of your personal information held by Ignition Group, please review our PAIA manual located on this website.

PRIVACY STATEMENT

20. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy, if we make major changes, we will update you. This policy was last updated on **10 March 2022**.

21. CONTACT US

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

Name of Private Body:	Ignition Telecoms Investments (Pty) Ltd
Email address:	dataprivacy@ignitiongroup.co.za
Postal address:	P.O Box 1611, Country 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@inforegulator.org.za
POPIA Complaints:	POPIAComplaints@inforegulator.org.za