

FairLifeSA (Pty) Ltd

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# PRIVACY POLICY

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COLLECTION OF DATA ON A WEBSITE

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FAIRLIFESA (PTY) LTD  
Building 1, Silver Lakes Office Park, Muirfield Boulevard, Pretoria

## Document Information

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# PRIVACY POLICY – COLLECTION OF DATA ON A WEBSITE

## 1. INTRODUCTION

- 1.1. This policy together with the terms and conditions of use as set out on our website or obtained on request to our information officer applies when dealing with FairLife (Pty) Ltd.
- 1.2. This policy sets out the basis on which any personal information (we collect from you, or that you provide to us, will be processed by us. The Protection of Personal Information Act, 2013 (POPI Act) is aimed at protecting your personal information and regulates the manner in which it may be processed.
- 1.3. The POPI Act created an Information Regulator which has a number of duties, including monitoring and ensuring compliance with the POPI Act to ensure that companies like FairLife (Pty) Ltd manage personal information in a responsible manner that respects your privacy.
- 1.4. Please read the following carefully to understand our views and practices regarding your personal information and how we will process it.

## 2. INFORMATION COLLECTED ON THIS WEBSITE

- 2.1. The following information may be collected and processed through our website:
  - 2.1.1. Information you give us - You may give us information about you by registering on the website, completing forms on the website or by corresponding with us by email, phone or otherwise. This includes information you provide when you register to use the website, submit requests for information or to change information on the website, request products and/or services on the website, participate in social media platforms on or through the website, enter a competition, promotion or survey and when you report a problem with our website. The information you give us may include your name and surname, birth date, gender, country of residence, closest city, address, email address, phone number, age, photograph, username, password and other personal information.
  - 2.1.2. Information we collect about you and your device – Each time you visit the website we may automatically collect the following information:
    - 2.1.2.1 technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, non-personal browsing habits and click patterns;
    - 2.1.2.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time); products you viewed, purchased or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- 2.1.3. Location Information - We may also collect information about your location, such as the IP Address of the device you access the Website from.
- 2.1.4 The Website Owner may collect, hold, and use the information collected about you and your device to improve the Website and the accuracy of the personal information stored on this Website.

### 3. USE OF COLLECTED DATA

- 3.1. We shall not use any personal information collected about you through your specific action of opting out from receiving any further communications from the Website Owner or its affiliates, save to process your opt-out request. In this regard, we may be required to disclose your personal information to our affiliates (including but not limited to Lightstone Proprietary Limited, Lightstone Group Proprietary Limited, Lightstone Explore Proprietary Limited), our business partners (including but not limited to the Automobile Association of South Africa NPC and motor dealerships which make use of our affiliates' products, solutions and systems), third party service providers or marketing bodies to ensure that your opt-out request is appropriately implemented.
- 3.2. We shall use non-identifiable data about you in the following ways:
  - 3.2.1 to ensure that content from the Website is presented in the most effective manner for you and for your device;
  - 3.2.2 to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
  - 3.2.3 to ensure the Website is safe and secure.
- 3.3. Should you not have opted out from receiving marketing material in entirety, we shall have the right to store your personal information and, provide your personal information only to our affiliates and business partners in each industry that you have selected on the Website, for purposes of such affiliates and/or business partners contacting you to market and/or sell their products and services. These affiliates and business partners will change from time to time (and currently include the entities referred to in clause 3.1 above), but we shall only provide your personal information in respect of those industries in which you have expressed an interest and/or not opted out from marketing. Should you be contacted by any of our affiliates or business partners, please note that from that point you will be subject to that affiliate's or business partner's terms of use and privacy policy, and should accordingly familiarise yourself with the applicable terms and conditions of the applicable policies. You may, at any time, opt out of any further marketing or contact through opting out on the Website and, from that point, your information will only be used as described in clause 3.1 above.
- 3.4. Please note that any reference to "we" or "us" in this Policy is intended to refer to FairLife (Pty) Ltd.

## 4. METHODS OF PROCESSING

- 4.1. We collect, use, disclose, retain, and dispose of your personal data in a proper manner, for authorised purposes and take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction.
- 4.2. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

## 5. SECURITY

- 5.1. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted via the internet. Any transmission is at your own risk. Once we have received your personal information, we will secure the integrity and confidentiality of the personal information in our possession or under our control by taking appropriate, reasonable technical and organizational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information.
- 5.2. Within our organisation, we restrict access of your personal data to those of our employees who have a business reason for knowing such data. We also maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your personal data from any unauthorised access.

## 6. PLACE

- 6.1. All data you provide to us is stored on our secure servers in South Africa although, in the future, we may consider the storage of data at a destination outside of South Africa. We will only transfer your personal information to facilities or parties outside South Africa where such transfer is compliant with applicable laws and regulations. For your information, this includes circumstances where:
  - 6.1.1 the territory is recognised as offering adequate standards of protection; and
  - 6.1.2 we have put in place adequate safeguards, including the implementation of standard contractual provisions which are approved as providing adequate safeguards with respect to the protection of your privacy.
- 6.2. By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy.

## 7. RETENTION TIME

Your personal information is kept only for the time necessary to process the service you request, or to fulfil the purpose outlined in this policy.

## 8. INFORMATION ABOUT COOKIES

- 8.1. The Website uses cookies to distinguish you from other users and to identify the device you use to connect to the website. This helps us to provide you with a good experience when you browse the website and allows us to make improvements to your experience. By continuing to use the website, you are agreeing to our use of cookies.
- 8.2. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be able to access all or parts of the Website.

## 9. YOUR RIGHTS

- 9.1. You have the right, at any time, to know whether personal data has been stored as well as the content and origin of the data to verify its accuracy. You also have the right to ask that your data be supplemented, blocked, erased, updated, or corrected. Requests should be sent to us at [info@pdvault.co.za](mailto:info@pdvault.co.za). Any access request may be subject to a fee to meet our costs in providing you with details of the data we hold about you.
- 9.2. We can refuse to delete your information if we are required by law to retain it or if we need it to protect our legitimate rights.

## 10. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this privacy policy at any time and for any reason. Any changes we may make to our privacy policy in the future will be notified to you by posting an updated version of this policy on this page with an updated revision date and, where appropriate, by email. Your continued use of or access to our services following the notification of any changes to this policy constitutes acceptance to those changes.

## 11. LINKS TO THIRD PARTY WEBSITES

The Website may, from time to time, contain links to and from the websites of third parties, our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

## 12. HOW TO CONTACT US

- If you have any queries about this Policy; you need further information about our privacy practices; wish to withdraw consent or correct your personal information, please contact the FairLife Information Officer.
- The FairLife Information Officer can be contacted on:  
Email: [info@fairlife.co.za](mailto:info@fairlife.co.za)

## 13. INFORMATION REGULATOR

- You have the right to complain to the Information Regulator.
- The contact details can be found at: <https://www.justice.gov.za/infoereg/>