

PRIVACY POLICY

INTRODUCTION

ITHUBA Holdings (RF) (Pty) Ltd (“**ITHUBA**”) recognises the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information.

This privacy policy explains how ITHUBA collects and uses your personal information. It contains information regarding the rights of natural persons (and juristic persons, where applicable) to whom personal information relates (“data subjects” or “you”).

ITHUBA reserves the right to amend this Privacy policy or add provisions to it at any time by publishing an updated version on our Website.

APPLICATION OF PRIVACY POLICY

This Privacy Policy applies to the ITHUBA Websites, email facilities, electronic applications or electronic services, any of ITHUBA social media sites and/or services, and messaging services such as WhatsApp and/or to the ITHUBA ecommerce services offered by ITHUBA and to all users of the ITHUBA Websites, email facilities, electronic applications or electronic services, the ITHUBA social media sites and/or services, and messaging services and/or to the ITHUBA ecommerce services, (hereinafter referred to as our / the “Websites”).

PERSONAL INFORMATION COLLECTED

The type of personal information to be collected by ITHUBA shall include, but not be limited to, the following:

- (i) General contact and account details;
- (ii) Device and browser information;
- (iii) Cookies;
- (iv) User information and browser history;
- (v) Location data of devices;
- (vi) Demographic information (i.e language, age, date of birth);
- (vii) Employment confirmation and history and reference checks;
- (viii) Vehicle details;
- (ix) Financial, criminal background status and/or credit worthiness to assess fit and properness;
- (x) Your images such as still pictures, voice, videos and other similar data;

- (xi) Social media and other online content such as information posted on social media, online files and similar data;

COLLECTION OF INFORMATION

ITHUBA collects personal information in various instances, including when:

- you contact ITHUBA or request information or services;
- ITHUBA provides services/products to you;
- you use ITHUBA's Websites or engage with ITHUBA through social media (including, but not limited to, Facebook, Instagram, Twitter etc.); and
- you engage and/or interact with ITHUBA.

ITHUBA may collect the information directly from you or from third parties (such as regulators, government authorities and registries, or attorneys representing you etc.). In some instances, it is necessary for you to provide us with the information, so that a party may render services to the other party.

In other instances, providing the information is optional, such as choosing to subscribe to or opt out from a marketing material. If you do not provide the information when it is necessary, we will not be able to provide services to you. If you do not provide the information when it is optional, you will not receive the benefit of providing the information (e.g., the marketing material).

While engaging with you on matters, ITHUBA will naturally be exposed to and collect personal information which includes your name, contact details, financial information as well as information regarding the matters that ITHUBA assists you with.

As with all companies, we may need to collect your information in terms of other various laws. Some examples of such laws include the Broad-Based Black Economic Empowerment Act 53 of 2003, Employment Equity Act 55 of 1998, the Companies Act 71 of 2008, the Consumer Protection Act 68 of 2008, the Copyright Act 98 of 1978, the Financial Intelligence Centre Act 38 of 2001. Additional Acts may be found in our PAIA Manual, available on our Website.

BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION

The basis on which ITHUBA processes personal information include (but are not limited to):

- to provide services/products to clients;
- in your legitimate interests;
- in our legitimate interests;
- to comply with legal or regulatory obligations;
- if you have provided your explicit consent; or
- if the processing is allowed by law.

The purposes for which ITHUBA processes personal information include, but are not limited to:

- marketing and promotion of ITHUBA's services;
- providing and improving services to clients;
- improving users' experience when using ITHUBA's Websites;
- communicating with persons for ITHUBA's internal purposes;
- enabling ITHUBA's internal operations; and
- exercising and defending legal rights.

DISCLOSURE OF PERSONAL INFORMATION

ITHUBA may release personal information or disclose it to third parties in certain circumstances.

These include, but are not limited to:

- if ITHUBA is required or authorised to do so by law or a court order or mandatory government/regulatory body reporting in terms of any applicable law;
- in order for ITHUBA to enforce its rights; or
- in order for ITHUBA to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

- third party service providers to ITHUBA (sometimes in other countries);
- third parties who provide research services to ITHUBA or its clients; and
- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

Where our Websites may contain links to third-party Websites; if you follow these links, you will exit our Websites and the use of these Websites will be subject to the relevant platform owners' own privacy notices. Where you respond to communications, we post on third-party platforms such as Facebook, Google and Twitter, such Personal Information may be shared with those third-party platforms for the purposes of providing you with targeted advertising via the relevant third-party platform based on your provided profile / interests. While these third-party Websites are selected with care, ITHUBA cannot accept liability for the use of your Personal Information by these organisations. You can however control what advertisements you receive using the privacy settings housed on the relevant third-party's platform.

TRANSFER OF PERSONAL INFORMATION

Personal information collected by ITHUBA may be transferred to natural or juristic persons in other countries. We would do so to provide services to you and would only transfer the information necessary for that service. We may do so to provide services to you, as some of our service providers are cloud-based—depending on the services we provide to you, this may include some or all of your information. Those countries' laws might not protect personal information in the same way or on the same level as the law in your country. However, ITHUBA will take reasonable steps to ensure that

recipients in other countries have appropriate privacy measures in place, for example, by entering into a contract with the recipient.

RETENTION OF PERSONAL INFORMATION

ITHUBA retains personal information for as long as may be reasonably necessary in accordance with applicable law, and/or in order to provide services to you. It is impractical for us to tell you in this document how long we may keep your information, however, our first obligation is to keep it as long as may be required by law. Thereafter, we would only keep information in order to provide services to you, or for specific business purposes.

COOKIES

ITHUBA's Websites makes use of cookies. Cookies store information regarding Website visitors. Cookies have various purposes, such as improving the visitor's experience on the Website and facilitating their use of the Website.

A Website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

DIRECT MARKETING

ITHUBA may distribute marketing and promotional communications and material. Recipients may opt-out and/or unsubscribe from receiving such communications by contacting ITHUBA at the details provided below or by clicking on the opt-out and/or unsubscribe link that will be contained in the relevant electronic communication.

SECURITY

ITHUBA takes all reasonable steps to protect and avoid unauthorised access to personal information. We have implemented various policies, procedures, hardware and software to safeguard personal information, and routinely review our operations in order to ensure that personal information is adequately protected.

YOUR (DATA SUBJECT) RIGHTS

The law might provide you with rights to access, amend or delete personal information that is in the possession of ITHUBA. However, ITHUBA may, in certain instances, legally refuse or decline such requests. If applicable, you might also have the right to object to ITHUBA's processing of their

personal information or to file a complaint with a regulator, however we encourage you to address your complaint to us first. In South Africa, the Information Regulator can be contacted at:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: infoereg@justice.gov.za

In some cases, you may withdraw your consent for processing—this withdrawal has no effect on lawful processing conducted up to that point. If you wish to exercise your rights, you can contact ITHUBA at the details provided below.

You are encouraged to contact ITHUBA in order to update your personal information as and when necessary.

If you provide us with Personal Information about someone else, you warrant that you have consent to provide us with such third-party information, and indemnify and hold us harmless against any losses or damages in the event that such consent is not in place.

CONTACT DETAILS

In order to contact ITHUBA for purposes relating to this privacy policy, please use these contact details:

Information Officer
ITHUBA Holdings (RF) (Pty) Ltd
14A Charles Crescent Ave, Eastgate Ext 4, Johannesburg
South Africa
Telephone: +27 11 346 6000
E-mail: info-officer@ithubalottery.co.za

Operating Hours: 08h00 – 17h00 Monday to Thursday; 08h00 to 16h00 on Friday.

ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

By visiting our Websites and where applicable, by providing us with your Personal Information,

- you acknowledge that you understand why your Personal Information needs to be processed;
- you accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
- where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.
- Where you provide us with another person's Personal Information for processing, you confirm that that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.

The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to, each of the parties' successors in title and/or assigns where applicable.

Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and/or the required permissions in respect of the processing of that Organization or entities' Personal Information.