

## Introduction

Welcome to the Userverse's Privacy Policy.

Userverse respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. [*IMPORTANT INFORMATION AND WHO WE ARE*]

2. [*THE DATA WE COLLECT ABOUT YOU*]

3. [*HOW IS YOUR PERSONAL DATA COLLECTED?*]

4. [*HOW WE USE YOUR PERSONAL DATA*]

5. [*DISCLOSURES OF YOUR PERSONAL DATA*]

6. [*INTERNATIONAL TRANSFERS*]

7. [*DATA SECURITY*]

8. [*DATA RETENTION*]

9. [*YOUR LEGAL RIGHTS*]

## 1. Important information and who we are Purpose of this privacy policy

This privacy policy aims to give you information on how Userverse collects and processes your personal data including any data you may provide through this website. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Responsible party

This privacy policy is issued on behalf of the Userverse (Pty) Ltd so when we mention "Userverse" "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Edge Telecoms Holdings Group responsible for processing your data. Userverse (Pty) Ltd is the responsible party and responsible for this website.

We have appointed an Information Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the Information Officer the details set out below.

### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our Information Officer in the following ways:

Full name of legal entity: **Userverse (Pty) Ltd**

Email address: [popiqueries@userverse.net](mailto:popiqueries@userverse.net)

Postal address: **Postnet Suite 418, Private Bag x108, Centurion, 0046**

Telephone number: **087 012 5053**

You have the right to make a complaint at any time to the Information Regulator (<http://www.justice.gov.za/infoereg/>). We would, however, appreciate the chance to deal with your concerns before you approach the Information Regulator so please contact us in the first instance.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (de-identified information).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- **Contact Data** includes [billing address, delivery address, email address and telephone numbers].
- **Financial Data** includes [bank account and payment card details].

- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you use our website, products and services].
- **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - purchase our products and services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and/or public sources as set out below
- **Technical Data from the following parties.** Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as Payfast <https://www.payfast.co.za/>, The Courier Guy <https://www.thecourierguy.co.za/> and PB Verify Credit Bureau <https://pbverify.co.za/> ]

### 3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>



## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising and we comply with all applicable laws regulating marketing.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have purchased goods or services from us or signed up with our Friends & Family community and you have not opted out of receiving that marketing.

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting us.

## Cookies

In order to collect the anonymous data described in the preceding paragraph, we may use temporary "cookies" that remain in the cookies file of your browser until the browser is closed.

Cookies are small, often encrypted text files, located in browser directories. They help users navigate websites efficiently and allow certain functions, such as buying products

online. When you visit websites, cookies may be stored on your computer. They are used to store a variety of information about you and your preferences, which is afterwards sent back to the visited website.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our site this may limit its functionalities or performance.

Our use of cookies is to enable more user-friendly, efficient and safe visits to our site. We use cookies for several reasons:

- To identify you as a registered or returning customer or website user.
- To provide you with safe restricted access areas.
- To remember you so that when you come back to our site you do not need to enter your information again.
- To understand what brought you to our site and what pages you visited.

Besides these, we may also use cookies which enable us to save your preferences from each of your visits to our site and present you with a version of our site which reflects your preferences. Our system is therefore able to recognize you each time you visit our site, without requiring you to systematically log in each time you visit.

You can find more information about cookies at: <http://www.allaboutcookies.org/> and for a video about cookies visit <http://www.google.com/policies/technologies/cookies/>.

We use the following types of cookies on our site:

'Cookies using for analytics, browser session tracking and security, basket and order activity.

We also use your IP address to help diagnose problems with our server, to administer our site and to gather broad demographic information.

We may also perform IP lookups to determine which domain you are coming from to more accurately gauge our users' demographics.

## Consent

The User hereby consents to the processing of their personal information in terms of the provisions of this Privacy Policy.

The User acknowledges and agrees that such consent has been given voluntarily after the User has read and understood the provisions of this Privacy Policy, in particular, regarding the following:

- the types of personal information to be processed, including specifically special personal information;
- the specific processing activities to be undertaken;
- the specific purpose/s for such processing; and
- the possible consequences for the User that may arise from such processing.

Should a User wish to withdraw any consent previously given by the User, they must notify THE COMPANY's information officer in writing.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact

US.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- Internal Third Parties, including entities within the Edge Telecoms Holdings Group
- External Third Parties, including Quickbase and card payment gateway providers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 6. Data retention

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## 7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to request access your personal data and the right to request the correction or deletion of your personal data.

If you wish to exercise any of the rights set out above, please contact our Information Officer.