

GATVOL PRIVACY POLICY

This Privacy Policy explains Our views and practices regarding the collection, processing, use, disclosure and transfer of Your information by Us (the **Privacy Policy**). By using, visiting, or browsing Our Site (use of Our Site including, amongst others, accessing Our Site and/or registering to use and using the Services), you accept and agree to this Privacy Policy and the GATVOL Terms. Any defined terms in this Privacy Policy bear meanings given to them in Our Terms of Website Use.

1. INFORMATION WE MAY COLLECT FROM YOU

We receive and store information, including personal information, about You and Your use of Our Site. This information is gathered in a number of ways, as further set out below. In this Privacy Policy, the term "personal information" has the same meaning as the meaning given to it in the Protection of Personal Information Act, 4 of 2013 (the **POPI Act**), as amended from time to time, and means, *inter alia*, information that can be used to uniquely identify or contact You. Any other information (non-personal information) is information that does not permit direct association with You. We may collect, process, use, disclose and transfer non-personal information for any purpose. You can choose not to provide personal information that We may request of You, but, in general, most of the personal information We request is required in order to provide Our Service fully, and the lack of such personal information may prevent Us from doing so. We may collect and process the following personal information about You:

- 1.1 information that You provide by filling in forms on or through Our Site or the Services. This includes information provided at the time of registering to use Our Site, or posting material. We may also ask You for information when You report a problem with Our Site or the Services;
- 1.2 details of Your visits to and use of Our Site including, but not limited to, traffic data, location data, weblogs, service provider page viewing statistics and other communication data, whether this is required for Our own billing purposes or otherwise and the resources that You access. For more information on this, see Our Cookie Policy;
- 1.3 information related to You and Your use of Our Site, including but not limited to: Your online activity, contributions, payment history, correspondence, internet protocol addresses, device and software data (such as type, configuration and unique identifiers). For more information on this, see Our Cookie Policy;
- 1.4 a record of correspondence if You contact Us;
- 1.5 information obtained from surveys that We may ask You to voluntarily complete from time to time, which We use for research purposes;
- 1.6 information posted by You pursuant to reviews of Our Site and the Services; and
- 1.7 any other information that may be necessary: (i) to carry out actions for the conclusion or performance of a contract to which You are a party; (ii) to comply with an obligation imposed on Us by law; (iii) to

protect Your legitimate interest; (iv) to pursue a legitimate interest of Ours or of a third party to whom the information is supplied.

2. **INTERNET PROTOCOL ADDRESSES**

We may collect information about Your device, including (where available) Your internet protocol address, operating system and browser type, for system administration, and to report aggregate information to Our advertisers and/or service providers. This is statistical information about Your browsing actions and patterns, and You cannot be identified by this information.

3. **WHERE WE STORE YOUR PERSONAL INFORMATION**

The information that We collect from You may be transferred to, and stored at, a destination outside of South Africa. It may also be processed by staff members operating outside of South Africa who work for Us or for one of Our service providers (including but not limited to payment processors, cloud service or other IT providers, and other companies that provide services to Us). Such staff members may be engaged in, among other things, the provision of the service or the provision of maintenance and support services. By submitting Your personal information, You agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that Your information is treated securely and in accordance with this Privacy Policy and in accordance with the terms of the POPI Act, as amended from time to time.

4. **SECURITY**

4.1 We take information security seriously and use reasonable administrative, technical, physical and managerial measures to protect Your personal information from unauthorised access. For example, We utilise an industry-standard protocol for certain of Your transmissions to Us, in order to encrypt certain personal information that You send to Us through the registration and sign up process.

4.2 Unfortunately, no security system can be guaranteed to be completely secure. Accordingly, although We will do Our best to protect Your personal information, We cannot guarantee the security of Your information transmitted to or through Our Site or the Services, and any transmission is at Your own risk. By using Our Site or providing information to Us through any means, You agree that We can communicate with You electronically regarding security, privacy, and administrative issues relating to Your use of Our Site.

4.3 In order to provide You with ease of access to Your account and to help administer Our Site and the Services, We implement technology that enables Us to recognize You as the account holder and provide You with direct access to Your account without requiring You to retype any password or other username identification when You revisit Our Site and the Services. You can choose not to take advantage of this feature on Your computer or other device by unchecking the box "Remember me" when You login on or through the application. To remove access to Your account from Your computer or other devices: (a) email Our administrator at INFO@GATVOL.CO.ZA for deactivation (note, deactivation may not occur immediately) or (b) delete Your settings from Your computer or other device (steps vary by device and the option is not available on all devices). You are responsible for maintaining the confidentiality of Your account access information and for restricting access to Your computer or device through which You access Your account. Where possible, users of public or shared devices should log out at the completion of each visit. If You sell or return a computer or other device,

You should log-out and deactivate the device before doing so. If You do not maintain the security of Your password or device, or fail to log out or deactivate Your device, subsequent users may be able to access Your account, including Your personal information.

4.4 We will not be liable for any access to Your personal information that is obtained by any third party through Your failing to adequately restrict access to Your device or Your account.

5. **USES MADE OF THE INFORMATION**

5.1 We use information and personal information held about You and other Users in the following ways:

5.1.1 to ensure that Content on Our Site and the Services is presented in the most effective manner for You, and for Your computer or other device;

5.1.2 to process Your registration on Our Site as a Registered User, Your subscription to the Services, and to communicate with You in respect of these topics;

5.1.3 to provide You, or allow Our service providers to provide You, with information, products or services that You request from Us or which We feel may interest You (such as newsletters, messages about new features, special offers, promotional announcements, consumer surveys and other marketing concerning Our Site and the Services), where You have expressly consented to be contacted for such purposes;

5.1.4 to determine Your general geographic location, to enforce the terms of this Privacy Policy and the GATVOL Terms, and to personalise Our Site and the Services and Our marketing to better reflect particular interests, helping Us to quickly and efficiently respond to inquiries and requests and otherwise analyse, enhance, administer or promote the service offering for You and other Users;

5.1.5 to carry out Our obligations arising from any contracts entered into between You and Us, if any, including the GATVOL Terms;

5.1.6 to allow You to participate in interactive features of Our Site and the Services, when You choose to do so; and

5.1.7 to notify You about changes to Our Site and the Services, or to the GATVOL Terms.

5.2 If You do not want Us to use Your information in this way, or to pass Your details on to Our service providers or third parties for marketing purposes, please tick the relevant box situated on the form on which We collect Your information or by responding to the emails We send You in this regard. You can also exercise this right at a later time by contacting Us at INFO@GATVOL.CO.ZA

5.3 We do not disclose information about Users to Our advertisers (if any) but We may provide them with aggregate information or information in an otherwise anonymous form about Our Users (for example, We may inform them that 500 men aged under 30 have clicked on their advertisement and/or Web page on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, individuals in a specific territory).

5.4 We may make use of the personal information We have collected from You to enable Us to comply with advertisers' wishes by displaying their advertisement to that target audience.

5.5 In addition, We may use other companies, agents or contractors to perform services on Our behalf or to assist Us with the provision of access to Our Site and the Services to You. For example, We engage services providers to provide marketing, communications, infrastructure and IT services, personalise and optimise Our Site and the Services, process credit card transactions, provide customer service, collect debts, analyse and enhance data, including Users' interaction with Our Service, and process consumer surveys. In the course of providing such services, these service providers may have access to Your personal information. We do not authorise these service providers to use or disclose Your personal information except in connection with providing the services We request of them.

6. **DISCLOSURE OF YOUR INFORMATION**

We may disclose Your personal information if We reasonably believe that access, use, preservation or disclosure of such information is reasonably necessary to: (a) satisfy any applicable law, regulation, legal process, or governmental request; (b) enforce applicable terms of use, including investigation of potential violations thereof; (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues; or (d) protect against harm to the rights, property or safety of Us, Our Users or the public as required or permitted by law. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. In connection with any reorganisation, restructuring, merger or sale, or other transferring of assets We reserve the right to transfer information, including personal information, provided that the receiving party agrees to respect Your personal information in a manner that is consistent with Our Privacy Policy.

7. **YOUR RIGHTS**

You have the right to ask Us not to process Your personal information for marketing purposes. We will usually inform You (before collecting Your information) if We intend to use Your information for such purposes or if We intend to disclose Your information to any third party for such purposes. You can exercise Your right to prevent such processing by checking certain boxes on the form on which We collect Your information or by responding to the emails We send You in this regard. You can also exercise this right at a later time by contacting Us at INFO@GATVOL.CO.ZA

8. **ACCESS TO INFORMATION**

8.1 The POPI Act gives You the right to access personal information held about You. Your right of access can be exercised in the manner set out in section 25 of the POPIA read with sections 18 and 53 of the Promotion of Access to Information Act 2 of 2000, by submitting an access request to Our information officer at INFO@GATVOL.CO.ZA Any access request may be subject to a fee for meeting Our costs in providing You with details of the personal information We hold about You. If You have a question regarding Our privacy practices, or want to exercise Your rights regarding Your personal information, please contact Us at INFO@GATVOL.CO.ZA

8.2 We also give You access and the ability to update a broad range of information about Your account, including Your contact information and Your communication preferences in the "Your Account" portion of the Services page accessible through Our Site. You must be signed in to Our Site to access "Your Account".

9. **CHANGES TO OUR PRIVACY POLICY**

We may, from time to time, make changes to this Privacy Policy. Any changes We may make to Our Privacy Policy in the future will be posted on this page and shall be effective immediately. We may also, at our discretion, notify you of such changes, but we are under no obligation to do so and it is Your responsibility to check this page on a regular basis to ensure that You are made aware of the terms of this Privacy Policy as updated from time to time.

10. **CONTACT**

- 10.1 Your personal information is controlled by Us (address below), and We provide You with access to Our Site and the Services and are the responsible party (where applicable).
- 10.2 If You have questions concerning Your account, please contact [Customer Service]. If You have questions concerning this Privacy Policy, including the treatment of Your personal information and/or Our use of cookies and other technologies, please contact Us via email at INFO@GATVOL.CO.ZA
- 10.3 This Privacy Policy was last amended on 08 AUGUST 2018
- 10.4 Use of Our Site constitutes acceptance of the GATVOL Terms.