

## Penquin Airtime (Pty) Ltd - Privacy Notice

1. Penquin Airtime (Pty) Ltd ("The Company") provides this Privacy Statement to help you make an informed decision about whether to use or continue using the Company Site, Company Software and/or the Company Services. Please read this Privacy Statement carefully. When you submit information to us, you consent to the processing of your information as described in this Privacy Statement. If you do not agree to our practices, please do not use The Company Site, The Company Software, or The Company Service.
2. The protection of your personal data collected, processed and used during your visit to the Company website is important to us. We work hard to ensure that your data is protected in accordance with the provisions on data protection and privacy. We design all of our products and services with data protection in mind. We constantly update our security practices and invest in our security efforts to enhance your privacy. This Privacy Statement does not apply to information that is collected by any third-party website or service that you access through the Services. In this Privacy Statement, to "**process**" information means to perform any operation on the information, whether or not by automated means, such as collection, recording, organizing, storing, adapting, use, disclosure, combining, erasing or destroying.
3. This Privacy Policy is incorporated into and is subject to The Company Terms of Service. Your use of The Company Site, The Company Software and The Company Service and any personal information you provide on The Company Site or The Company Service remains subject to the terms of this Privacy Policy and our Terms of Service.
4. This Privacy Policy is part of The Company's Terms of Service and covers the treatment of user information, including personally identifying information, obtained by The Company, including information obtained when you access The Company's Site, use The Company Service or any other software provided by The Company.
5. This Privacy Policy does not apply to the practices of companies that The Company does not own or control, or to individuals whom The Company does not employ or manage, including any of the third parties to which The Company may disclose user information as set forth in this Privacy Policy.
6. Our website collects data in accordance with International provisions on data protection and privacy on the basis of technologies best suited to our Services. This automatic data collection occurs for statistical purposes in order to optimise the webpages and online Companying. These so-called "visitor data" include, in particular, the name of the provider, IP address, the type of browser and operating system, as well as the pages accessed including any search terms and websites from which you have accessed our website. Data are always processed anonymously, i.e., the data will not be associated with your person.
7. If you do not agree to the collection of this data, you can reject data collection and storage at this point and at any time and with future effect.

8. The Company may obtain the following types of information from or concerning you or your business, which may include information that can be used to identify you as specified below (“Personally Identifying Information”):
  - 8.1. **User Provided Information:** You provide certain Personally Identifiable Information, such as your phone number, billing information (if applicable) and physical address to The Company when choosing to participate in various uses of The Company Service.
  - 8.2. **Cookies Information:** When you visit The Company Site, we may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser. The Company uses both session cookies and persistent cookies. A persistent cookie remains after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser help file directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, The Company Site may not function properly if the ability to accept cookies is disabled.
  - 8.3. **Log File Information:** When you use The Company Site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, browser language, referring / exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, one or more cookies that may uniquely identify your browser, your phone number, phone number you are requesting the status of and various status information. When you use The Company Service, our servers log certain general information about you.
9. Where the website allows for the input of personal data (e-mail address, names, addresses, etc.), such data is entered voluntarily. The Company expressly states that such data shall not be shared with any third party and shall be used exclusively for the purposes of business relations. Furthermore, any storage of personal data is subject to prior consent.
10. If you submit Personally Identifiable Information to us through The Company Site, or The Company Service, then we use your personal information to operate, maintain, and provide to you the features and functionality of The Company Site and The Company Service.
11. We do not use your phone number or other Personally Identifiable Information to send commercial or Companying messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your phone number, or email address, if provided, without further consent for non-Companying or administrative purposes (such as notifying you of major Company Site or Company Service changes or for customer service purposes).

12. We may use both your Personally Identifiable Information and certain non-personally-identifiable information (such as anonymous user usage data, cookies, IP addresses, browser type, clickstream data, etc.) to improve the quality and design of The Company Site and The Company Service and to create new features, promotions, functionality, and services by storing, tracking, and analysing user preferences and trends.
13. We may use cookies and log file information to:
  - 13.1. remember information so that you will not have to re-enter it during your visit or the next time you use The Company Service or The Company Site;
  - 13.2. provide custom, personalized content and information;
  - 13.3. monitor individual and aggregate metrics such as total number of visitors, pages viewed, etc.; and
  - 13.4. track your entries, submissions, views and such.
14. We do not sell or share your Personally Identifiable Information (such as phone number) with other third-party companies for their commercial or Companying use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out.
15. We may share your Personally Identifiable Information with third party service providers to the extent that it is reasonably necessary to perform, improve or maintain The Company Service. Sharing of information sometimes involves cross-border data transfers. We use lawful mechanisms to legitimize data transfers too other countries.
16. We may share non-personally-identifiable information (such as anonymous User usage data, referring / exit pages and URLs, platform types, asset views, number of clicks, etc.) with interested third-parties to assist them in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality on The Company Site.
17. We may collect and release Personally Identifiable Information and/or non-personally-identifiable information if required to do so by law, or in the good-faith belief that such action is necessary to comply with the laws of the Republic of South Africa, international law or respond to a court order, subpoena, or search warrant or equivalent.
18. The Company also reserves the right to disclose Personally Identifiable Information and/or non-personally-identifiable information that The Company believes, in good faith, is appropriate or necessary to enforce our Terms of Service, take precautions against liability, to investigate and defend itself against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of The Company Site or our servers, and to protect the rights, property, or personal safety of The Company, our users or others.
19. You may, of course, decline to submit Personally Identifiable Information through The Company Site or The Company Service, in which case The Company may not be able to provide certain services to you.

If you do not agree with our Privacy Policy or Terms of Service, please delete your account, and discontinue use of The Company Service; your continued usage of The Company Service will signify your assent to and acceptance of our Privacy Policy and Terms of Service.

20. If you would like to know the personal data that the Company stores about you, please contact us in writing, with a request in respect of what details you would like. The easiest way to correct or delete certain personal data is to contact us in writing. Please be reminded that we will review your request but may be restricted in our ability to change or delete your personal data. We may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or privacy rights of a third party.
21. The Company and its affiliated websites are committed to providing you with relevant content and information across our sites. To do this, we may collect information about your searches, and use this information to serve you with ads on our sites or elsewhere online that match your apparent interests.
22. We do not share your personal information (such as email addresses) with unaffiliated third parties so they can serve you with advertisements.
23. We also allow third parties to collect information about your online activities through cookies and other technologies. These third parties include:
  - 23.1. business partners, who collect information when you view or interact with one of their advertisements on our sites, and
  - 23.2. advertising networks, who collect information about your interests when you view or interact with one of the advertisements they place on many different Web sites on the Internet.The information gathered by these third parties is used to make predictions about your characteristics, interests or preferences and to display advertisements on our sites and across the Internet tailored to your apparent interests.
24. We take reasonable steps to ensure that your information is relevant to its intended use, accurate, and complete.
25. Please note that if you refuse to accept cookies from this Site you might not be able to access portions of our site.
26. To protect your privacy and security, we take reasonable steps to verify your identity before granting you access to The Company Service. Please contact The Company via email or available web forms with any questions or comments about this Privacy Policy, your personal information, your consent, or your opt-in or opt-out choices.
27. The Company uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We cannot, however, ensure or

warrant the security of any information you transmit to The Company and you do so at your own risk. Using unsecured wifi or other unprotected networks to submit messages through The Company Service is never recommended. Once we receive your transmission of information, The Company makes commercially reasonable efforts to ensure the security of our systems.

28. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If The Company learns of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. The Company may post a notice on The Company Site or through The Company Service if a security breach occurs.
29. The Company Site and Service are hosted in the Republic of South Africa and are intended for and directed to users in the Republic of South Africa. If you are a user accessing The Company Site and Service from the United States, European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure, that differ from the laws of the Republic of South Africa, please be advised that through your continued use of The Company Site and Service, which are governed by South African law, this Privacy Policy, and our Terms of Service, you are transferring your personal information to the Republic of South Africa and you expressly consent to that transfer and consent to be governed by South African law for these purposes.
30. In the event that The Company is acquired by or merged with a third party entity, we reserve the right to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganisation, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.
31. This Privacy Policy may be revised periodically and this will be reflected by the "effective date" below. Please revisit this page to stay aware of any changes. Your continued use of The Company Site and The Company Service constitutes your agreement to this Privacy Policy and any amendments.

Date Last Modified:

This Privacy Notice was last modified 7 September 2020.