

## CONLOG PRIVACY POLICY

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### 1. Background

- 1.1. This privacy policy ("**Privacy Policy**") supplements and forms part of the Terms of Service entered into between you and Conlog via the Conlog website, web service or mobile app.
- 1.2. Any terms used but not defined in this Privacy Policy will have the same meaning as those mentioned and defined in the Terms of Service document.

### 2. Protection of Personal Information Act, 2013

- 2.1. Should you decide to use or continue to use our website, web service or mobile app, we will require you to voluntarily provide us with personal information, including without limitation:
  - 2.1.1. your email address;
  - 2.1.2. your meter information;
  - 2.1.3. your banking information.
- 2.2. All information including personal information which you provide on the website, web service or mobile app must be true, accurate and complete.
- 2.3. You acknowledge that by accessing and using Conlog's website, web service or mobile app, you will be providing Conlog with personal information, which may be protected by data protection legislation, including without limitation, the Protection of Personal Information Act, 2013 ("**POPI**") of s .
- 2.4. You authorise us to process all such personal information and to transmit any such personal information to any affiliate (which affiliate may also process such personal information) for the purposes of performing our obligations to you under the Terms of Service and in the furtherance of our legitimate interests as further set out in this Privacy Policy.
- 2.5. You consent to the processing of your personal information by Conlog in accordance with the above.
- 2.6. For purposes of this Privacy Policy -
  - 2.6.1. "**personal information**" means the personal information which you provide via the website, web service or mobile app which falls within the definition of "personal information" in POPI. This information may include, without limitation:
    - 2.6.1.1. your information relating to your account, transactions, purchases and banking information;
    - 2.6.1.2. a record of the correspondence when you contact us;
    - 2.6.1.3. information about your device software and hardware, including the unique internet mobile equipment identity (IMEI) number of your mobile telephone;
    - 2.6.1.4. the unique integrated circuit card identity (ICCID) number of your SIM card in your device;
    - 2.6.1.5. your internet protocol (IP) address;
    - 2.6.1.6. language of your device and its manufacturer, screen size and model of the device and any other technical information; and
    - 2.6.1.7. the date and time, country and the IP address of the device from which your device connected to our back-end server.

### 3. Policy Application

- 3.1. Conlog takes your privacy seriously and is committed to protecting your personal information. We use the personal information that we collect from you in accordance with this Privacy Policy.
- 3.2. Personal information when used in this Privacy Policy means information that can identify you as an individual or is capable of identifying you. By personal information we don't mean general, statistical, aggregated or anonymised information.
- 3.3. Your use of our website, web service or mobile app signifies your consent to us collecting and using your personal information as specified below.
- 3.4. You must not impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your identity or affiliation with anyone or anything.

### 4. Processing of Your Information

- 4.1. Collection of your personal information:
  - 4.1.1. You may provide personal information to us when communicating with us or registering an online user profile.

- 4.1.2. You may order a product or a service and provide your name, e-mail address, delivery address, credit or debit card number and expiry date so that the order can be processed and your products or services delivered to you.
- 4.1.3. When you call us, we may monitor or record your calls and store details of the phone number(s) you use to make the calls. This information is used to better address your customer service needs.
- 4.1.4. If you enter a competition or participate in a promotion, we will ask for your name, address and e-mail address and any other relevant information about you.
- 4.1.5. When you connect to the Internet using our services, we will collect your Calling Line Identification Number (CLI).
- 4.1.6. We will collect information concerning your tastes and preferences both when you tell us what these are and through our analysis of customer traffic, including through the use of cookies (as described below).
- 4.1.7. It may be that you provide to us details of credit or debit cards or bank accounts in order to make payments to us. Any such information ("confidential financial information") will be used by us only for the specific purpose for which it was provided to us.
  
- 4.2. Use of your personal information:
  - 4.2.1. We may use your information to confirm that your requests and orders have been received;
  - 4.2.2. to validate you as a customer when using our services and calling our call centre/service desk;
  - 4.2.3. to prevent and detect criminal activity, fraud and misuse of or damage to our services or networks;
  - 4.2.4. to monitor and analyse the conduct on your online user profile to identify any fraud or risk and compliance issues and to monitor whether you are complying with the Terms of Service and this Privacy Policy;
  - 4.2.5. to improve our product selection and your experience of our website, web service or mobile app by, for example, monitoring your browsing habits; and
  - 4.2.6. to develop new Conlog products and services and identify potential new markets and market trends.
- 4.3. We may also use your personal information and process such information for the purposes of management, research, analysis, corporate reporting, credit-scoring, affordability assessment, and improving business efficiencies.
- 4.4. We may use personal information collected about you to contact you by post, telephone and electronic mail (that is email, picture, video, and SMS) about functionality changes to our website, web service and mobile app Services or changes to our Terms of Service, and to communicate with you about your customer benefits and advise you regarding the use of our services.
- 4.5. We may use the information collected about you to contact you by post or phone about new customer offers and services. We may also contact you by electronic mail for these purposes, subject to any preferences selected by you.
- 4.6. Subject to your preferences in respect of each of our services, selected third parties may use the personal information collected about you to contact you about information that you might find interesting.
  
- 4.7. Retention of your personal information:
  - 4.7.1. The time periods for which we keep your information may vary according to the use or purpose attached to the information. Unless there is a specific legal requirement requiring us to keep your information, however, we will not keep it for longer than necessary for the purpose for which the information was collected or for which it is to be processed. We will in any event delete or destroy any personal information which has become obsolete, in line with the requirements of POPI.
  - 4.7.2. Conlog undertakes never to sell or make your personal information available to any third party other than as provided for in this Privacy Policy.
  - 4.7.3. Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.
  - 4.7.4. If you disclose your personal information to a third party, such as an entity which provides or operates third party content, a website linked to the website, web service or mobile app or anyone other than Conlog, Conlog shall not under any circumstances be liable for any loss or damage, howsoever arising, suffered by you as a result of the disclosure of such information to the third party. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.

- 4.7.5. In particular, when you click on the payment gateway or other third party link or in the "popup" of the payment gateway or other third party, you leave the services controlled by Conlog. Any personal information which you may submit to the payment gateway or another third party will not be collected or controlled by us, but instead will be collected and controlled by the payment gateway or the other third party and therefore will be subject to the privacy laws and privacy terms imposed by the payment gateway or such other third party, and never by us. You acknowledge that it is your sole responsibility to read the privacy policies of the payment gateway and/or any third party before submitting any personal information or other data to the payment gateway and/or such Third Party.
- 4.7.6. You indemnify us to the maximum extent permitted by law against any losses, including without limitation, any direct, indirect, special, incidental or consequential damages, whether arising out of contract, statute or delict or otherwise and regardless of whether Conlog was advised of the possibility of such loss or damage arising out of any personal information or other data which is directly or indirectly lost or unlawfully collected, processed or used by any third party.
- 4.8. Disclosure of your personal information:
- 4.8.1. Conlog reserves the right to access and disclose personal information to comply with applicable laws, regulations and lawful government requests, subpoena, order of court or legal process served on us, or to protect and defend our rights or property, to operate its systems properly to protect itself or its users or to solve any customer disputes.
- 4.8.2. We may provide aggregate statistics about our sales, customers, traffic patterns and other website information to third parties, but these statistics will not include any information that could identify you.
- 4.8.3. We may from time to time elect to make use of other companies to provide some of our services, and our services will then be offered through third party service providers on our website, web service and mobile app. We may then share your personal information with these companies. These companies can and will process this information and will be obliged to keep such information confidential.
- 4.8.4. In the event of fraudulent activity, Conlog is entitled to disclose relevant personal information for criminal investigation purposes or in line with any other legal obligation for disclosure of the personal information which may be required of it.
- 4.8.5. We will ensure that all of our employees, third party service providers, divisions and partners (including their employees and third party service providers) having access to your personal information are bound by appropriate and legally binding confidentiality obligations in relation to your personal information.
- 4.8.6. Some of the persons to whom we may disclose your personal information to in terms of this Privacy Policy may be located in a country outside of South Africa and may be subject to less stringent data privacy laws than South Africa.
- 4.8.7. We will:
- 4.8.7.1. treat your personal information as strictly confidential, save where we are entitled to share it as set out in this Privacy Policy;
- 4.8.7.2. take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
- 4.8.7.3. provide you with access to your personal information to view and/or update personal details;
- 4.8.7.4. promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
- 4.8.7.5. provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request; and
- 4.8.7.6. upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged to retain.
- 4.9. A cookie is a piece of information that is stored on your computer's hard drive by your web browser. On revisiting our website, web service and mobile app, our computer server will recognise the cookie, giving us information about your visit.
- 4.10. When and where are the cookies used?
- 4.10.1. We allocate cookies during the registration process for our services. These cookies will hold information collected during your registration and will allow us to recognise you as a customer and provide you with the services you require. If your browser is set to reject cookies, you may

not be able to use the website, web service and mobile app Services. We may also use this data to better understand your interests while online and to personalise your visits to our site.

- 4.10.2. On different sections of our portal, we use cookies to collect information concerning visitors to our site. Our servers use two different types of cookies. The first type is known as a 'session-based' cookie and is allocated to your computer only for the duration of your visit to our site. It helps you to move around the site faster and, if you're a registered customer, it allows us to give you information relevant to your selected Conlog service. This cookie automatically expires when you close down your browser. The second type of cookie is known as a 'persistent' cookie. A persistent cookie will remain on your computer for the period of time that has been set for each cookie. Persistent cookies are used for the purposes of advertisements on our site and to track whether these advertisements are clicked on by users; to control how often you are shown a particular advertisement; to tailor content to your preferences; to count the number of anonymous users of the site and to provide security within shopping baskets or transactions. The types of cookies used and the manner in which the information generated by them is used will be governed by those advertisers' privacy policies. We have no control over these.
- 4.11. Refusing or opting out of cookies
- 4.11.1. Most browsers are set by default to accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance and to prompt you every time a cookie is sent to you or to allow you to choose not to receive cookies at all.
- 4.12. Managing your privacy preferences
- 4.12.1. If you would like us to stop processing your information for marketing purposes, please contact the Conlog call centre on 0861-CONLOG, 031 268 1227 or [support@conlog.com](mailto:support@conlog.com)

## 5. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website, web service or mobile app, and you are requested to revisit these terms and conditions from time to time to check for any such changes and clarifications. There rests no onus or duty on us to specifically draw your attention to changes and clarifications once posted on our website, web services or mobile app.

## 6. Questions and Contact Information

- 6.1. If you would like to access, correct, amend or delete any personal information we have about you, or you simply want more information, contact us on:

**Durban Office (Head Office)**

info@conlog.com / [support@conlog.com](mailto:support@conlog.com)

+27 (31) 268-1111 / 0861-CONLOG

+27 (31) 268-1500

10 Mzimkhulu Drive, Dube Trade Port, La Mercy, 4407

P.O. Box 1563, Tongaat, KwaZulu-Natal , South Africa, 4400

- 6.2. Any requests for amendment of personal information must however be in writing in order for us to ensure that same is captured correctly.