

# Data Privacy Policy – The Ignition Group

## Introduction

This Statement sets out how your personal information will be used by The Ignition Group and applies to any information, including personal and special personal information, you give to The Ignition Group or which The Ignition Group may collect from third parties.

It is important that you read this Statement carefully before submitting any personal information to The Ignition Group. By submitting any personal information to The Ignition Group, you provide consent to the processing of your personal information as set out in this Statement. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws.

## Who is the Ignition Group and how can you contact us

When we refer to 'Ignition Group' in this Privacy Policy, we mean Ignition Telecoms Investments (Pty) Ltd) and its subsidiary companies (Comit Technologies Pty Ltd, CCS Outsourcing Pty Ltd, MVNX (Pty) Ltd, Mobius Mobile Telecommunications Pty Ltd, me and you mobile (Pty) Ltd, Ignite Training Academy (Pty) Ltd, Viva Life Insurance Ltd and Viva Cover (Pty) Ltd). With our headquarters in Durban, South Africa we are a global customer acquisition business, operating in the Telecommunications, Home Services and Financial Services sectors. You can find out more about the Ignition Group on our website at [www.ignitiongroup.co.za](http://www.ignitiongroup.co.za)

GPS - Global Positioning System. GPS navigation involves multiple satellites in the Earth's atmosphere transmitting signals to devices that can then determine their current location on the ground. Almost all smart devices (mobile phones, tablets, laptops) can connect to the GPS. We may use geotags to improve our cybersecurity and improve our data encryption methods. We may also use GPS to facilitate a delivery utilising a drone.

Please do not submit any personal information to The Ignition Group if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, The Ignition Group may not be able to provide its products and services to you.

## How to contact us

If you have any comments or questions about this Statement, please contact the Information Officer at [dataprivacy@ignitiongroup.co.za](mailto:dataprivacy@ignitiongroup.co.za)

## Amendment of this Statement

We may amend this Statement from time to time for any of the following reasons:

- to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;

- to comply with changes to any legal or regulatory requirement;
- to ensure that our Statement is clearer and more favourable to you;
- to rectify any mistake that may be discovered from time to time; and/or
- for any other reason which The Ignition Group, in its sole discretion, may deem reasonable or necessary.

The Ignition Group will take reasonable steps to notify you of such an amendment, including publication on our website.

### **Information which we may collect about you**

You, as the data subject, consent to the collection of the following information about you:

- information that may include your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, government identity number and financial information;
- records of correspondence or enquiries from you or anyone acting on your behalf;
- details of transactions you carry out with us;
- details of contracts, or sales you carry out with us;
- sensitive or special categories of personal information, including information relating to criminal records and credit status
- information relating to juristic entities with which The Ignition Group may transact with from time to time

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. In addition, you should not share their personal information with us, unless they have consented to you sharing such information with us and to us processing such information in accordance with this Statement.

You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application form for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.

We may also collect your personal information for lawful purposes from your appointed agent, any regulator, or other third party that may hold such information.

If you subscribe to our mailing lists for latest news and other information, you will be asked to specify the areas in which you are interested so that we can tailor the information which we send to you to cover the topics which we believe you might be interested in. We also collect information from you when you register on our site, place an order, abandon cart or subscribe to our newsletter. Any data or information that we request that is not required will be specified as voluntary or optional.

### **How we use the personal information we collect**

We may use, transfer and disclose your personal information for the purposes of:

- providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
- managing your account or relationship and complying with your instructions or requests;
- detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- assessing and dealing with complaints and requests;
- operational, marketing, auditing, legal and record keeping requirements;
- verifying your identity or the identify of your beneficial owner;
- transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes;
- complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- recording and/or monitoring your telephone calls and electronic communications to/with The Ignition Group in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- conducting market research and providing you with information about The Ignition Group's products or services from time to time via email, telephone or other means (for example, events);
- where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again;
- disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
- monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from The Ignition Group or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and The Ignition Group;
- human resources management and payroll;
- supply chain management and logistics;
- improving or evaluating the effectiveness The Ignition Group's business or products, services or offerings; and
- prevention and control of any disease.

We may from time to time (and at any time) contact you about services, products and offerings available from The Ignition Group or specific subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications.

If you wish to update your preferences by email, or to unsubscribe from receiving such communications, you can do so via our Support Centre at [info@ignitiongroup.co.za](mailto:info@ignitiongroup.co.za)

### **Disclosure of your information**

Your personal information may be shared with The Ignition Group of companies, our agents and sub-contractors, and selected third parties who process the information on our behalf.

We may also disclose your personal information to third parties in the following circumstances:

- to any of the other The Ignition Group of companies subsidiaries, business partners or other third parties to –assess and monitor any of your applications for The Ignition Group’s products or services;
  - which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications;
  - have a better understanding of your circumstances and needs to provide and improve The Ignition Group’s products and services;
  - to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combating of crime;
- to any regulator or supervisory authority, including those in foreign jurisdictions, if The Ignition Group in required to do so in terms of Applicable Laws;
  - to a prospective buyer or seller of any of our businesses or assets;
  - to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of The Ignition Group, other clients or other third parties; and/or
  - to your agent or any other person acting on your behalf, an or an introducer.

We may transfer your information to another of The Ignition Group’s entities, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if such disclosure is necessary.

### **Retention of your information**

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

### **Cookies**

Our site uses cookies to keep track of your visits to our web site. A cookie is a small file that can be stored by your browser on your computer's hard drive. We may use these to do a number of things and the intention is to improve your online experience. We use cookies to deliver contents specific to your interest and to save your password so that you don't have to re-enter it every time you visit our site. Cookies help us to recognise when you next visit our web site and note the advertisements

displayed to you. This allows us to tailor the service we provide to your preferences. We may use them as a way of measuring our service and to work with marketing partners to improve our service. You can usually change your browser so that it will not accept cookies.

### **Usage Data**

We may also collect information that your browser sends whenever you visit our Service or when you access a service by or through any device (“**Usage Data**”).

This Usage Data may include information such as your device Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our products and services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. It can also collect and process information in terms of the type of device you use, your device unique ID, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

### **Location Data**

We may use and store information about your location if you give us permission to do so (“**Location Data**”). We use this data to provide features of our Offering, to improve and customize our Offering. You can enable or disable location services when you use our Offering at any time by way of your device settings.

### **Security of your personal information**

We take the security of your personal information very seriously. Our online services protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by us, we use computer systems with limited access housed in facilities using physical security measures. All data held by us is kept using encrypted storage.

### **Access to, correction and deletion of your personal information**

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 (“PAIA”). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by The Ignition Group, please review our PAIA Manual located at [https://ign-website-strapicms.westeurope.cloudapp.azure.com/uploads/PAIA\\_Manual\\_c7bf3c30ec.pdf](https://ign-website-strapicms.westeurope.cloudapp.azure.com/uploads/PAIA_Manual_c7bf3c30ec.pdf)

You may request the correction of personal information The Ignition Group holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, The Ignition Group may limit the products and services offered to you.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

This policy was last updated on [30<sup>th</sup> June 2021]

## **Complaints**

Should you believe that The Ignition Group has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with The Ignition Group:

Name of Private Body: Ignition Telecoms Investments (Pty) Ltd

Designated Information Officer: Emma Kate Morris

Email address of Information Officer: [dataprivacy@ignitiongroup.co.za](mailto:dataprivacy@ignitiongroup.co.za).

Postal address: P.O. Box 1611, Country Club, 4301

Street address: Quadrant 4, Centenary Building, 30 Meridian Drive, Umhlanga, Durban

Phone number: +27 31 582 8300

If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 012 406 4818

Fax: 086 500 3351

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

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Emma Kate Morris

Information Officer

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Date

