

## Sawubona Privacy Notice

### Introduction

At Sawubona we aim to help consumers. We understand that having your information is a big responsibility and are committed to responsibly using and securing your information. The purpose of this notice is to describe the way that we collect, store, use, and protect information that can be associated with you

This is our (Sawubona CI Proprietary Limited – registration number 2018/113684/07) plan of action when it comes to protecting your privacy

### Personal information

Personal information includes information we collect (i) on registration, (ii) on submission, (iii) from transaction and (iv) from you and your vendors voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

Common examples of the types of personal information which we may collect and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind;
- contact information – such as your phone number or email address;
- address information – such as your physical or postal address;
- consumer data – such as your vehicle ownership; or
- demographic information – such as your gender or marital status.

### Collection

We collect information when you

- register to receive communication from us,
- enter our competitions,
- communicate directly with us via email, phone, mail or other communication medium; or
- use our website
- submit your information to our data partners

## **Purpose for collection**

We use or process any information that you provide to us for the purposes that you indicated when you agreed to share it. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- providing your existing vendors with more accurate, enriched information. We would never share your information with any company who does not prove to us that they have an existing relationship with you, or who does not pass our standards for reputability and compliant processing of personal information
- business purposes such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes such as handling claims, complying with regulations, or pursuing good governance.
- Statistical or research purposes using anonymised, non-identifiable information

## **Sharing**

We may collect your personal information from or share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications.
- our affiliates and business partners in order to improve the products, services and offers provided to you by our affiliates and business partners. In this case, we will seek to require our business partners and affiliates to honour this privacy policy. We carefully consider our business partners before working with them, to ensure that they are reputable and have adequate personal information processing policies and practices. For a full list of our business partners please see the list [here](#), which is updated from time to time.
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit); and
- other third parties who provide us with relevant services where appropriate.

## **Security**

We are committed to your privacy and safeguarding information that you share with us. We commit to ensuring that appropriate security measures are in place to protect your personal information from accidental loss, damage, disclosure, unauthorised access, use and/or alteration.

We have implemented an Information Security Management System that aligns to the industry best practice guidelines. Implemented security controls are subject regular to reviews to ensure applicability, relevance, and efficacy.

In addition to this, access to your personal information is limited to our employees, agents, contractors and third-party service providers who are required to have access to perform their duties. Your personal information is only processed upon our instruction and all authorised individuals are subject to strict non-disclosure and privacy agreements.

Though we have implemented reasonable security measures, we have also put in place procedures to deal with any suspected security compromises. Should we identify a breach, we will notify you and the Information Regulator as the law requires.

### **Accurate and up to date**

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this notice. You are able to review or update any personal information that we hold on you by accessing your account online or by emailing us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

### **Retention**

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this notice, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

### **Transfer to another country**

We will not transfer any personal information across a country border without your prior written consent.

### **Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## Acceptance

Sawubona's mission is to improve the consumer experience for South Africans by influencing the relevance, quality and price of products and services received by South Africans. Sawubona also seeks to reduce undesired, irrelevant spam. This is achieved by helping consumer businesses understand their customers better and to tailor and improve their products, offers and services provided to you. Your acceptance of the terms of this privacy notice allows us to ensure you benefit from these services. If you would prefer your experiences, not be improved and tailored using the data you have provided, you may ask us to cease processing your data. In order to do this, you can request us to exclude you by emailing [informationofficer@sawubona.co.za](mailto:informationofficer@sawubona.co.za)

## Access and enquiries

You have the right to object to the processing of your personal information and have a choice as to whether or not to accept these terms and conditions.

You have the right:

- to confirm with us whether we hold any information about you;
- at a prescribed fee, which we will give you a written estimate of,
  - to request the record of information held by us
  - to request a description of the information held by us, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information
- to update and correct any out-of-date or incorrect information we hold about you;
- destroy or delete a record of information of you which we are no longer authorised to retain; and

## Contact

Should you believe that we have utilised information contrary to applicable law, we ask you to first attempt to resolve any concerns with us by contacting our Information Officer at [informationofficer@sawubona.co.za](mailto:informationofficer@sawubona.co.za). If you are not satisfied with this process, you have the right to lodge a complaint with the Information Regulator of South Africa.

The Information Regulator's contact details are:

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal: P.O Box 31533, Braamfontein, Johannesburg, 2017

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).