

PRIVACY POLICY

GetOn Foundation Trust (GetOn) view privacy and security as well as the compliance with applicable data law seriously. We are committed to protecting your privacy and personal information and complying with applicable data legislation in South Africa when you access our website or make use of the GetOn goods or services, and so, take all reasonable steps, including technological, procedural and other controls, to protect your personal information. Any personal information that you provide to GetOn will be used and retained in accordance with this Privacy Policy and all other relevant codes and standards.

This Privacy Policy is intended to inform you of the privacy practices that GetOn apply and to explain how we collect, store, use, transfer and disclose (handle) your personal information. Please read it in full as it applies to you.

1. Information that we may collect about you

- 1.1 We use the term “personal information” or “personal data” to mean information that relates to you. Personal information includes, for example, your name, contact information including your cell phone number, email address, identity number, age, gender, income, ethnic group and information relating to your education, criminal, employment, and/or financial history. Information that is not linked to a particular individual, such as statistical or aggregated information, is not personal information and is not covered by this Privacy Policy. 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 the GetOn services, and the lack of such personal information may prevent us from doing so.
- 1.2 Generally, we may collect personal information about you when you access the GetOn website and/or subscribe for the services offered by GetOn. We may also collect information about you when you use the website, report a problem with the website, use support services, or communicate with us. In addition, information may be collected when you respond to customer surveys, and promotions. The aforementioned is not a complete list of all the ways that we could collect information. Below, we have set out information that may be collected and processed:
 - 1.2.1 information that you provide on or through the website. This includes information provided at the time of registration (such as your name, date of birth, address, account information and email address), receive maintenance, making payments or posting material. We may also ask you for information when you report a problem with the website or the good and/or services;
 - 1.2.2 details of your visits to and use of our website 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;
 - 1.2.3 details about written or verbal enquiries, problems or other contact and any records when you utilise our services, and/or use our help desk, call centre or other channels of communication;
 - 1.2.4 information related to you and your use of the website and/or the GetOn services, 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);
 - 1.2.5 information obtained from surveys that we may ask you to voluntarily complete from time to time, which we use for research purposes;
 - 1.2.6 information posted by you pursuant to reviews of the website and the GetOn services; and

- 1.2.7 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; and/or (iv) to pursue a legitimate interest of ours or of a third party to whom the information is supplied.
- 1.3 GetOn may also collect non-personal information such as your IP address, date, time and duration of your access to the website to track your visits to the website so that we are able to deliver a more personalized experience. This information is used to develop future products and/or services that meet your requirements and needs.
- 1.4 **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 does not identify you.
- 1.5 **Sensitive personal information.** Depending on the GetOn services that you require, we may also collect sensitive personal information including your:
- 1.5.1 **financial information** – such as your bank account details;
 - 1.5.2 **sensitive demographic information** – such as your race or ethnicity;
 - 1.5.3 **medical information** – such as information about your physical or mental health;
 - 1.5.4 **criminal information** – such as information about your commission or alleged commission of any offense or about any related legal proceedings; and/or
 - 1.5.5 **employment information** – including your membership of a trade union.

2. Acceptance

- 2.1 **Legal capacity.** You may not access our website or order our goods or request our services if you are younger than 18 (eighteen) years old or do not have legal capacity to conclude legally binding contracts.
- 2.2 **Deemed acceptance.** By accepting this Privacy Policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.
- 2.3 **Cookies and other analytics.** By using the website, you are consenting to our use of cookies, caching tools and analytics tools, in accordance with this Privacy Policy. If you do not agree, please refrain from using the website. Like many Apps, we use cookies and similar technologies to collect additional data and to improve our GetOn services. These technologies use small data files that are transferred to your mobile device. If you return to an application, it shows that it is a repeat visit. Such technologies cannot be used to identify you on the websites of third parties, including the website of the analysis provider. It can additionally be used to store your preferred settings, example language and country settings, so that they will be immediately available on your next visit. We use the web analysis system to raise the efficiency of our App. Personal information is collected and stored either electronically by the using "cookies" or provided voluntarily with your consent and knowledge.

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 information technology 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 Protection of Personal Information Act, 2013 (**POPIA**).

4. Use and analysis of personal information

4.1 For us to make your use of the website and GetOn services as successful as possible, GetOn collects, stores and uses your personal information. When you agree to provide information to us, we will indicate the purpose/s for which we may use or process it, however, below are some examples:

- 4.1.1 process the goods and services you've bought from us, and keep you updated with your order progress;
- 4.1.2 keep you informed generally about new products and services (unless you choose not to receive our marketing messages);
- 4.1.3 to communicate any requested information;
- 4.1.4 to provide you with any GetOn services and/or Products and any changes to the service or product;
- 4.1.5 to authenticate a user and provide access to restricted pages;
- 4.1.6 to create new and interesting products or services that we feel may meet your future requirements and personalize them for you;
- 4.1.7 to contact you with offers or promotions based on how you use our products and services. These include your calling and messaging activities, location information and browsing information (unless you choose not to receive these messages);
- 4.1.8 to carry out research and statistical analysis including to monitor how customers use of products and services on an anonymous or personal basis;
- 4.1.9 to prevent and detect fraud or other crimes, recover debts or trace those who owe us money;
- 4.1.10 to provide aggregated reports to third parties (such reports do not contain any information which may identify you as an individual);
- 4.1.11 for training purposes;
- 4.1.12 to bill you for using our products or services, or to take the appropriate amount of credit from you;
- 4.1.13 at your option, we will let you know about other companies' products and services we feel may interest you (including offers and discounts we've specially negotiated for our customers);
- 4.1.14 to ensure that content on the website and the GetOn services are presented in the most effective manner for you and for your computer or other device;
- 4.1.15 to determine your general geographic location, enforce the terms of this Privacy Policy, personalise the website and the GetOn 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;
- 4.1.16 to administer this website;
- 4.1.17 to carry out our obligations arising from any agreements entered into between you and us, if any; and
- 4.1.18 to allow you to participate in interactive features of the website and the GetOn services, when you choose to do so.

4.2 If you have any concern regarding the use of your information, please contact us at admin@getonskillsdevelopment.co.za

- 4.3 Except as otherwise set out expressly herein, we do not disclose personal 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 7 women, under the age of 21, have clicked on their advertisement 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 with a particular interest).
- 4.4 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.
- 4.5 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 the website and the GetOn services to you. For example, we engage services providers to provide marketing, communications, infrastructure and information technology services, personalise and optimize our website and the online services, provide customer service, analyze and enhance data, including users' interaction with the online services, and process consumer surveys. During the provision of 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 from them.
- 4.6 Only personal information that is necessary for the purposes stated in this Privacy Policy will be collected, stored, used and otherwise processed by GetOn.

5. Disclosure of your personal information

- 5.1 All non-personal information collected and assembled by GetOn, is owned and retained by GetOn. You are hereby expressly notified of and consent to our collection of your personal information.
- 5.2 The personal information that has been collected by GetOn, may be disclosed or otherwise processed by us if permitted by applicable law, if the necessary consent has been obtained from you and/or if the access, use, preservation, disclosure or other processing of such information is reasonably necessary:
- 5.2.1 for legal and regulatory compliance of applicable law, regulation, legal process, or governmental request;
 - 5.2.2 for the purpose of conducting research and improving our products or services;
 - 5.2.3 for debt collecting purposes and/or debt recovery;
 - 5.2.4 for emergency services where applicable, this includes your approximate location;
 - 5.2.5 to enforce applicable terms of use and terms and conditions (including but not limited to this Privacy Policy), including investigation of potential violations thereof;
 - 5.2.6 to detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues;
 - 5.2.7 to protect against harm to the rights, property or safety of us, our users or the public as required or permitted by law, which includes exchanging information with other companies and organisations for the purposes of fraud protection and where applicable credit risk reduction;
 - 5.2.8 in connection with any reorganization, restructuring, merger or sale, or other transferring of assets; provided that the receiving party agrees to respect your

- personal information in a manner that is consistent with this Privacy Policy; and/or
- 5.2.9 for the compilation, use and sharing of information that does not pertain to any specific individual,

and you hereby consent to us and our duly authorized agents and contractors processing your personal information for such purposes.

- 5.3 At your option and only with your consent, we may also share your information with partner organisations, so they can contact you about their products and services.
- 5.4 We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or this website, or to take precautions against legal liability. We will inform you of any such transfer or disclosure if required to do so by law.
- 5.5 GetOn may for lawful purposes and in accordance with applicable laws, monitor your calls, e-mails or messages and such information will be made available to third parties if and to the extent required by law.

6. International transfer of information

If you visit our website outside of South Africa, any communications will necessarily result in the transfer of information across international boundaries. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not necessarily be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

7. Your Rights and Obligations

- 7.1 You may only send us your own personal information or the information of another data subject where you have their permission to do so.
- 7.2 You have the right to ask us to review your personal information that you have provided to us and make any changes to it.
- 7.3 You have the right to make a request for a copy of the personal information that we hold about you. Having provided adequate proof of identity, you have the right to request that we confirm, free of charge, whether or not the responsible party holds personal information about the data subject and request from a responsible party the record or a description of the personal information about the data subject held by the responsible party. For further information on your right to access your personal information, please see our [access to information](#) page.
- 7.4 You have the right to choose whether you wish to receive marketing material. By accepting this policy, you consent to receiving marketing material. Should you no longer wish to receive such material you can opt out by contacting us by email at admin@getonskillsdevelopment.co.za. GetOn undertakes to comply with all applicable law in relation to direct marketing.
- 7.5 You have the right to request GetOn to correct or delete your personal information. However, GetOn will retain such personal information that it is required to retain in terms of any applicable law and for as long as it is necessary to fulfill the purposes as set out in this Privacy Policy. We take reasonable steps to ensure that the personal information we collect and store is accurate, complete and up-to-date. We also endeavor as best we can to delete any incorrect or unnecessary personal information, particularly in

respect of your contact details. Please ensure that your personal information is accurate, complete and up-to-date by contacting us as soon as possible if you become aware that your personal information is in any way inaccurate, incomplete or out-of-date.

- 7.6 You have the right to request details in respect of the identity of third parties who have or had access to your personal information, if applicable, and you have the right to request the identity of third persons who are in charge of your personal information as well as those third person to whom your personal information may have been communicated, if applicable.
- 7.7 You have the right to lodge a complaint with the Information Regulator in accordance with POPIA.
- 7.8 Please note that the website may, from time to time, contain links to and from the websites of our partner networks, advertisers, service providers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and cookie policies and that GetOn does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This also applies to any third-party websites or content you connect to using our products and services.
- 7.9 **Right to object to use of personal information.** In certain circumstances, you have the right to object to us processing your personal information. Please use our [privacy policy](#) to contact us and a member of our dedicated team will respond to you.
- 7.10 **How to lodge a complaint.** Should you believe that we have used your personal information contrary to applicable law, we request that you first attempt to resolve any concerns with us directly. Kindly [click here](#) to contact us and a member of our dedicated team will contact you. If you are not satisfied with such a process, you have the right to lodge a complaint with the Information Regulator in accordance with POPIA.

8. Security of your personal information

GetOn is committed to protecting the security of your personal information and will take all reasonable steps to secure the personal information that you submit to us. We use a variety of security measures and physical, electronic and managerial procedures to protect the personal information that we have collected, or that you have provided, from unauthorized access, use or disclosure. This will minimize the risk of loss, misuse, alteration, disclosure and unauthorized access of your information that is under our control. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the absolute security of your personal information which is transmitted via the website which may be accessed by an unauthorized third party via for instance any unlawful activity.

9. Access to Information

POPIA gives you the right to access information held about you. Your right of access can be exercised in accordance with POPIA. Any access request may be subject to a fee for meeting our costs in providing you with details of the information we hold about you.

10. Changes

We may change the terms of this Privacy Policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date

that they were last updated. If you do not agree with the changes, then you must stop using the website and our services. If you continue to use the website or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.