

HUGE CONNECT - CUSTOMER PRIVACY NOTICE

1. HUGE CONNECT'S PRIVACY COMMITMENT

- 1.1. Huge Connect Pty Ltd respects the privacy and confidentiality of Personal Information of its customers as well as any other natural and/or juristic person interacting with Huge Connect.
- 1.2. Huge Connect is therefore committed to comply with all data protection legislation in South Africa, in particular the Protection of Personal Information Act, 4, 2013 (herein after referred to as POPIA).
- 1.3. Huge Connect has developed this Customer Privacy Notice to assist you (Huge Connect customers, users of Huge Connect's website and persons communicating with Huge Connect by means of telephone or email enquiries) to understand how Huge Connect obtain, use and disclose your Personal Information (herein after referred to as PI) , as is required by the POPIA.

2. YOUR CONSENT TO THE PROCESSING OF YOUR PI:

- 2.1. This Customer Privacy Consent forms an integral part of the terms and conditions set out in Huge Connect's Master Service Agreement published on www.hugeconnect.co.za.
- 2.2. By submitting your PI to Huge Connect, you will be deemed to have given consent to the processing of your PI as set out in this Notice.
- 2.3. If you do not agree with these terms, Huge Connect will not be able to enter into an agreement with you and also respectfully request that you do not provide any Personal Information by means of a web enquiry through Huge Connect's website or otherwise to Huge Connect.

3. WHAT IS PERSONAL INFORMATION (PI)?

- 3.1. PI is defined in POPIA but, in short encompasses any information which identifies you as an individual, and includes information such as your name, identity number, postal

and street address, email address, telephone number, credit vetting, banking details and payment history and can also include as per POPIA:

- 3.1.1. information relating a person's race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth;
- 3.1.2. information relating to a person's education or medial, financial, criminal or employment history;
- 3.1.3. any identifying number symbol such as cell phone number, account number, handset code, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the person;
- 3.1.4. a person's biometric information;
- 3.1.5. a person's personal opinions, views, or preferences;
- 3.1.6. correspondence sent by a person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; and
- 3.1.7. the views of opinions of another individual about the person.

4. WHY AND HOW DO WE COLLECT YOUR PI?

- 4.1. Huge Connect collects PI directly from you where you provide us with your personal details, for example:
 - 4.1.1. when you enter into an agreement with Huge Connect for the provisioning of a Huge Connect product or services;
 - 4.1.2. when you submit enquiries to us or contact us by telephone, email, or web enquiry.
- 4.2. We also collect PI indirectly or from third parties, which includes without limitation:
 - 4.2.1. information from the use of our services and products;
 - 4.2.2. information regarding the usage of our website, i.e. non-personal browsing

- habits and click patterns, etc;
- 4.2.3. public records, places where you may already have made your PI public (for example, on social media);
- 4.2.4. information from credit bureaus; or
- 4.2.5. information from individuals/directors whom you have appointed as your representative, where you are a corporate entity.
- 4.3. Huge Connect will only collect your personal information from other sources where we are legally entitled or obliged to do so.
- 4.4. You are entitled to ask Huge Connect which sources we have used to collect your PI, where you have not provided the PI directly to Huge Connect.
- 4.5. The type and nature of information we collect will depend on the purpose for which it is collected and used.
- 4.6. The purpose of collection of the PI will be evident from the context within which the PI is collected, but specifically includes the following:
 - 4.6.1. To enter into an agreement with you for the provisioning of Huge Connect products and services;
 - 4.6.2. To respond to enquiries and queries made by you;
 - 4.6.3. To improve on Huge Connect product and service offerings;
 - 4.6.4. To comply with specific statutory reporting requirements;
 - 4.6.5. To protect your or Huge Connect's legitimate interests or legal rights.
- 4.7. Where possible, you will be informed regarding what information you are mandated to provide to us and what information is optional, as well as the consequences where mandated information is not provided.

5. HOW AND WHAT DO WE USE YOUR PI FOR?

- 5.1. The term used for collection and use of PI in the POPIA is "processing". Processing includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying, or disposing of personal

information.

- 5.2. The purposes of the initial collection of your PI are set out above in broad terms.
- 5.3. Huge Connect shall only further process your PI where the further processing does not conflict with the purposes above and only where Huge Connect is indeed allowed in terms of POPIA. This includes inter alia the following:
 - 5.3.1. To protect the integrity of the electronic communications network and systems of Huge Connect and other network operators, with whom Huge Connect has contracted, to ensure the constant availability of such systems and networks;
 - 5.3.2. This also includes fraud prevention and detection, information security and privacy incidents etc;
 - 5.3.3. To understand how Huge Connect's products and services are used in order to be able to develop relevant products and services that meet the personal needs of Huge Connect's customers;
 - 5.3.4. To share information with third parties, where such third parties are involved in the provisioning of Huge Connect products and services - this might even include third parties in another country. Huge Connect shall however only share your PI with third parties where Huge Connect has a contractual commitment that the mentioned third parties have adequate PI protection safeguards in place and are subject to similar data protection laws as those that apply in South Africa.
 - 5.3.5. To do debt recovery;
 - 5.3.6. To send you promotional materials or details by SMS, e-mail, or post, regarding products and services which may be of interest to you.
 - 5.3.6.1. This will only be done with your consent or where you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within a reasonable time frame;
 - 5.3.6.2. You can opt out of receiving communications from us at any time;
 - 5.3.6.3. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out;

5.3.6.4. Provided that you have consented, Huge Connect may send you information about other companies' products and services, where we think this may interest you.

5.3.7. For historical, research or statistical purposes provided that the outcomes of such processing will not be published in a manner where any of your PI is in an identifiable format.

6. FOR HOW LONG WILL YOUR PI BE RETAINED?

6.1. We collect your PI for a specific purpose and will not keep it for longer than is necessary to fulfil that purpose, unless Huge Connect is obliged to keep it for legitimate business reasons or as per statutory requirements.

7. WHAT RIGHTS AND OBLIGATIONS DO YOU HAVE??

7.1. You have the following rights and duties regarding your PI:

7.1.1. To access your PI that Huge Connect has on record;

7.1.2. To request Huge Connect to correct any of your PI that is outdated or incorrect;

7.1.3. To lodge a request with Huge Connect to delete or destroy your PI or object to Huge Connect processing your PI.

7.2. These requests must be sent to Huge Connect in writing using Annexure A attached hereto.

7.3. The consequence of such a request may be that Huge Connect may have to suspend service provisioning to you for a period of time or terminate the agreement that Huge Connect has with you.

7.4. You also need to note that certain information/records are subject to statutory retention periods, which means that Huge Connect may not be able to delete or destroy your PI upon request.

7.5. Requests to Huge Connect to access, update and correct or delete or destruct your PI must be done by completing the Form in Annexure A of this document and e-mailing it to the Information Officer whose details are on the Form.

- 7.6. Complaints regarding the processing of your PI must be lodged with Huge Connect by completing the Form in Annexure B of this document and e-mailing it to the Information Officer whose details are on the Form.
- 7.7. Huge Connect will take all reasonable steps to confirm your identity before providing details of your PI.
- 7.8. Also please note that any access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy.

8. WILL YOUR PI BE PROTECTED?

- 8.1. Huge Connect is legally obliged to provide adequate protection and safeguards for the PI that we hold.
- 8.2. Huge Connect commits to implement technological and physical controls to prevent unauthorised access and use of PI, in line with industry practices and standards.
- 8.3. Huge Connect will, on an on-going basis, review its security controls and related processes to ensure that your PI is secure and safeguarded.

9. CHANGES TO THE STATEMENT

- 9.1. Huge Connect reserves the right to amend this Customer Privacy Notice at any time, without prior notice, by posting the amended Notice on Huge Connect's website, i.e. www.hugeconnect.co.za.



Approved by the Information Officer of Huge Connect Pty Ltd.

Date of publication: 24/11/2020

ANNEXURE A: PERSONAL INFORMATION REQUEST FORM

**PERSONAL INFORMATION
REQUEST FORM**

Please submit the completed form to the Information Officer:

Name	
Contact Number	
Email Address:	

Please Note that Huge Connect requires proof of identification prior to processing your request.

There may also be a reasonable charge for providing copies of the information requested.

A. Particulars of Data Subject

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Request

I request Huge Connect to:

- (a) Inform me whether it holds any of my personal information
- (b) Provide me with a record or description of my personal information
- (c) Correct or update my personal information
- (d) Destroy or delete a record of my personal information

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

C. Instructions

D. Signature Page

Signature
Date

ANNEXURE B: POPI COMPLAINT FORM

10. POPI COMPLAINT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please Note that Huge Connect requires proof of identification prior to processing your request.

Please submit your complaint to the Information Officer:	
Name	
Contact Number	
Email Address:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complain to the Information Regulator.

The Information Regulator: Ms Mmamoroke Mphelo

Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Email: inforreg@justice.gov.za

Website: <http://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant	
Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
B. Details of Complaint	
C. Desired Outcome	
D. Signature Page	
Signature:	
Date	