

THE PROTECTION OF PERSONAL INFORMATION ACT CUSTOMER PRIVACY NOTICE

How we at (*DigitalShero Media Group*) (*herein DigitalShero*) obtain, use, and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). We adhere to the highest standards of protecting your personal information when we process it by virtue of your use of our Services, your use of our website <https://www.digitalshero.co.za>, any of our related blogs, websites, applications or platforms (collectively, "the Website"), or by providing us with your personal information in any other way. As such we have created this specific and detailed Privacy Policy for you to read and appreciate exactly how we safeguard your personal information and respect your privacy ("Policy")

1. Definition of personal information

According to the Act "personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

We are committed to protecting your privacy and to ensuring that your personal information is collected and used properly, lawfully and transparently.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 1 July 2021.

2. Personal Information we record and process.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional. We may collect, use, store and transfer ("process") different kinds of personal data about you which we have grouped together;

This personal information about you will include:

- i. Identity Data including your first name, last name, location of residence, age preferred language, title, date of birth and gender or the information about your company such as company registration details, company address and name.
- ii. Contact Data including email address, telephone numbers, social media contact details, physical/registered addresses.
- iii. Transaction Data including details about payments to and from you, service or performance contracts, contractual terms, contract fees, signups, invoices and other details of services you have obtained from us, or provide to us
- iv. Technical Data including internet protocol address/es, time zone setting and location, cookies, browser type and versions, operating system and platform and other technology on the devices you use to access the Website.
- v. Marketing and Communications Data including your preferences in receiving notices and marketing from us and our third parties and your communication preferences.
- vi. Social Media Data including all information accessible on your publicly available profile such as images, photos, photo tags, likes, followers, comments, posts and stories.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

3. How is your personal data collected?

1. There are various ways in which we collect data from and about you, including through.
2. Direct interactions: You may give us your identity, Contact, Profile, Social Media, Transaction, Usage, Technical, Marketing and Communications and Financial Data by completing various Digital Shero’s forms, Website forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 1. Use our Services;
 2. Use our Website;
 3. Participate in our online programmes;
 4. Consult with us;
 5. Complete forms
 6. Sign-up for newsletters;
 7. Interact with us via webinar or social platform group
 8. Provide any contracted services to us as a service provider or independent contractor on contract with us.
 9. Request information to be sent to you.
 10. Attend any Digital Shero event online or in person; or
 11. Give us some feedback
3. Automated technologies or interactions: As you interact with our Website, we may automatically collect Technical Data, Profile and Usage Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
4. Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:
 - a. Technical Data and Social Data from the following parties:
 - i. analytics providers Google Analytics based in USA.
 - ii. social networks Facebook, Instagram, Twitter based in USA.
 - iii. survey data providers Survey Monkey based in USA
 - iv. marketing platforms Hello Alfred based in USA; and
 - v. search information providers Google based in USA.
 - b. Contact, Financial and Transaction Data from providers of technical and/or payment services being Unity Technologies based in Denmark, Ecwid Inc. based in USA, Yoco based in South Africa and
 - c. Identity and Contact Data from publicly available sources being Google based in USA.

4. How we use your personal information

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For record keeping purposes;
- In connection with legal proceedings.

4.1. Purposes for which we will use your personal data:

- a. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate, and which exact External Third Parties your personal data is handed to for same reasons.
- b. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE / ACTIVITY

TYPE OF DATA

LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST

SPECIFIC EXTERNAL THIRD PARTY TO WHOM THE INFORMATION IS PROVIDED (IF ANY)

To engage with you after you have contacted us requesting an engagement via the Website or otherwise

1. Identity
2. Contact
3. Marketing and Communications

1. Express consent
2. Performance of a contract with you
3. Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services, as well as to develop our services and grow our organisation)

To provide you with our Services as contracted

1. Identity
2. Contact
3. Financial
4. Transaction
5. Profile
6. Usage
7. Technical
8. Marketing and Communications
9. Social Media

1. Performance of a contract with you
2. Express consent
3. Necessary to comply with a legal obligation
4. Necessary for our legitimate interests (to provide you with the Services you contracted to acquire from us, and to keep our records updated and to study how engagees use our Services)

To contract with you as a service provider to DigitalShero

1. Identity
2. Contact
3. Financial
4. Transaction
5. Marketing and Communications

1. Performance of a contract with you
2. Express consent
3. Necessary to comply with a legal obligation
4. Necessary for our legitimate interests (to allow you to provide us with your services, and to keep our records updated and to study how we may use third-party services)

To allow you to participate in any Digital Shero event

1. Identity
2. Contact
3. Usage
4. Profile
5. Technical
6. Marketing and Communications

1. Performance of a contract with you
2. Express consent

To provide it to our authorised third-party service providers who need your personal data to provide their private services to you (such as to contracted instructors, content providers or payment gateway providers)

1. Identity
2. Contact
3. Financial
4. Transaction
5. Profile
6. Marketing and Communications

1. Performance of a contract with you
2. Necessary for our legitimate interests (to provide you with the Services you have contracted from the authorised third-party, and to develop our services and grow our organisation)

To manage payments, fees and charges

1. Identity
2. Contact
3. Financial

4. Transaction
5. Profile

1. Performance of a contract with you
2. Necessary for our legitimate interests (to make or receive necessary organisation payments)
3. Express consent

To manage our relationship with you which may include notifying you about changes to our terms or Privacy Policy or Services

1. Identity
2. Contact
3. Marketing and Communications

1. Performance of a contract with you
2. Necessary to comply with a legal obligation
3. Necessary for our legitimate interests (to keep our records updated and to study how engagees use our Services)
4. Express consent

To administer and protect our organisation and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

1. Identity
2. Contact
3. Technical
4. Usage
5. Profile

1. Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud and in the context of an organisation restructuring exercise)
2. Necessary to comply with a legal obligation
3. Express consent

To deliver relevant Website content and services to you and measure or understand the effectiveness of the information we serve to you

1. Identity
2. Contact
3. Usage
4. Marketing and Communications
5. Technical

1. Necessary for our legitimate interests (to study how engagees use our services, to develop them, to grow our organisation and to inform our marketing strategy)
2. Express consent

To use data analytics to improve our Website, Services, engage relationships and experiences

1. Technical
2. Usage
3. Identity
4. Profile

To provide you with direct and user-specific marketing, make suggestions and recommendations to you about events or services that may be of interest to you

1. Identity
2. Contact
3. Technical
4. Usage
5. Marketing and Communications

1. Necessary for our legitimate interests (to develop our services and grow our organisation)
2. Express consent

Marketing

1. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To manifest your rights attached to any marketing sent to you as an existing customer, please use the in-built prompts provided on those communications, or contact us.
2. You will receive marketing communications from us if you are an existing data subject of ours, use our Services/Website (and have accepted this Policy), have requested information from us, have participated in any Digital Shero Service, programme or event, or if you provided us with your details when registering for a promotion or event and, in each case, you have not opted-out of receiving that marketing.

1. Third-Party Marketing

1. Whilst we may use your personal data within the organisation, we will get your express opt-in consent before we share your personal data publicly with any entity outside of Digital Shero's group of organisations for public purposes.

2. Opting-Out

1. You can ask us or authorised third parties to stop sending you marketing messages at any time by contacting us or the relevant third party at any time and requesting us to cease or change your marketing preferences.
2. Where you opt-out of receiving these marketing messages, this opt-out will not apply to other personal data of yours which we process for another lawful basis.

3. Change of Purpose

1. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
2. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosure of Personal Information

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Controlling your personal information

1. We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen. We share your personal data within the DigitalShero of organisations and affiliates, and this may involve transferring and processing your data outside of South Africa.

6. Personal Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

Security Measures

We will:

- treat your personal information as strictly confidential;
- 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.
- promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information.
- provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request; and
- We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

IT IS TO BE NOTED THAT, ALTHOUGH WE TAKE THE AFOREMENTIONED PRECAUTIONS IN PROTECTING YOUR PERSONAL INFORMATION, WE SHALL HOWEVER NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION IF OUTSIDE OUR REASONABLE CONTROL.

7. Your Rights to access the personal information.

You have the right at any time to:

- rectify the Personal Information collected by us
- object to the processing of Personal Information (subject to legislation);
- request the return or destruction of Personal Information (subject to legislation)
- lodge a complaint with the company.

Personal Information processed by us may be routed/transferred to a third country or International organization and if transferred the following security measures are in place to protect the Personal Information that will be transferred:

International transfers

We share your personal data within the DigitalShero Media Group organisations and affiliates, and this may involve transferring and processing your data outside of South Africa.

Whenever we transfer your personal data out of either territory, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Information Regulator's Office of South Africa; and/or

Where we use certain service providers, we may use specific contracts/clauses approved by the Information Regulator's Office which give personal data the same protection it has in South Africa.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of South Africa.

All enquiries must be addressed to the information officer:
Bolawana Margret Shivanda, who can be contacted via email at email address:
mags@digitalshero.co.za

Information Regulator details

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>

Changes to our Privacy Policy From time-to-time our Privacy Policy may be changed. The latest version will be available on our websites.