



**P U L E N G**  
T E C H N O L O G I E S



**PULENG TECHNOLOGIES (PTY) LTD**  
**PRIVACY STATEMENT**

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## PULENG TECHNOLOGIES PRIVACY STATEMENT

The purpose of this document (“Privacy Statement”) is to inform the reader of how Puleng Technologies (Pty) Ltd (“Puleng” ) manages and processes (any operation or set of operations performed on data by any means such as collecting, recording, organization, storage, adaptation or alteration of personal information etc.) personal information. The manner in which PULENG manages Personal Information (personal data, as defined in the data protection laws, includes, but is not limited to, names, postal address, email address, telephone number, date of birth etc.), is subject to the Electronic Communications and Transactions Act 25 of 2002; Protection of Personal Information Act 4 of 2013 and the European Union General Data Protection Regulations (“Data Protection Laws”).

When users (individuals who make use of any PULENG websites and/or applications) interact with PULENG, submit information to PULENG, or sign up for any products and/or services offered by PULENG, all personal information, which may be collected through our website or other channels, is treated as confidential and private. PULENG manages the user’s personal information in the following ways:

- By collecting personal information
- Using such personal information
- Sharing (amongst ourselves) the user’s personal information
- Disclosing such personal information to PULENG’s authorised service providers as well as relevant third parties in the manner set forth in this Privacy Statement

PULENG may from time to time update this document to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements.

### 1. COLLECTION OF PERSONAL INFORMATION

1.1 Generally, PULENG collects user Personal Information in the following ways:

1.1.1 Upon submission of an application form or other forms relating to any of PULENG’s products and services.

1.1.2 When interacting with PULENG’s customer service officers (via telephone calls, letters, face-to-face meetings and emails).

1.1.3 When making use of any PULENG service i.e. Websites and/or applications.

1.1.4 Upon submission of a request for PULENG to contact them, or request to be included in an email or other mailing lists.

1.1.5 When there is a response to PULENG promotions, initiatives or to any request for additional Personal Data.

1.1.6 When contacted by or respond to PULENG marketing representatives and customer service officers.

- 1.1.7 When PULENG receives references from business partners and third parties.
- 1.1.8 When PULENG seeks information from third parties in connection with the products and services applied for.
- 1.1.9 Upon submitting Personal Information to PULENG for any other reason.
- 1.2 When a user browses PULENG Websites, it is generally done anonymously. PULENG does not automatically collect Personal Information unless such information is provided or login credentials are used.
- 1.3 If PULENG is provided with any Personal Information relating to a third party (e.g. information about a spouse, children, parents and/or employees), by submitting such information, a user confirms that the consent of the third party to provide PULENG with such personal information has been obtained.
- 1.4 Users must ensure that all Personal information submitted to PULENG is complete, accurate, true and correct. Failure to do so may result in PULENG's inability to provide users with the products and services requested.

## **2. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

- 2.1 Generally, PULENG collects, uses and discloses Personal Information of users for the following purposes:
  - 2.1.1 To respond to queries and requests.
  - 2.1.2 To manage the administrative and business operations of PULENG and comply with internal policies and procedures.
  - 2.1.3 To facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies.
  - 2.1.4 To match any Personal Information held, relating to any of the purposes listed herein.
  - 2.1.5 To resolve complaints and handle requests and/or enquiries.
  - 2.1.6 To prevent, detect, investigate a crime, analyse and manage commercial risks.
  - 2.1.7 To provide media announcements and responses.
  - 2.1.8 To monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes.

- 2.1.9 For legal purposes (including but not limited to obtaining legal advice and dispute resolution).
  - 2.1.10 To conduct investigations relating to disputes, billing, suspected illegal activities or fraud.
  - 2.1.11 To meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on PULENG (including but not limited to responding to regulatory complaints, reporting to regulatory bodies and conducting audit checks, due diligence and investigations).
  - 2.1.12 For purposes which are reasonably related to the afore mentioned.
- 2.2 In addition to the above, PULENG collects, uses and discloses Personal Information of users for the following purposes:
- 2.2.1 As a customer or an employee of an organisation which is a customer of PULENG:
    - 2.2.1.1 Opening or continuation of accounts and establishing or providing users with the products and services subscribed to.
    - 2.2.1.2 Facilitating the continuation or termination of user subscription to PULENG products and services.
    - 2.2.1.3 Facilitating the daily operation of the products and services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting).
    - 2.2.1.4 Facilitating third party services if purchased, obtained, administered or processed through PULENG.
    - 2.2.1.5 Managing and executing PULENG service level agreements with users.
    - 2.2.1.6 Processing of payment instructions, direct debit facilities and/or credit facilities requested by users.
    - 2.2.1.7 Enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners).
    - 2.2.1.8 Administering and processing any insurance claims and payments arising under the respective policies.
    - 2.2.1.9 Credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies).
    - 2.2.1.10 Generation of internal reports (including but not limited to annual, operational and management reports).

- 2.2.1.11 Processing referral payments and commission fees to PULENG's external partners.
- 2.2.1.12 Administering fee adjustments, refunds and waivers.
- 2.2.1.13 Notifying users of their entitlements under loyalty and reward programs with PULENG;
- 2.2.1.14 Analysing user experience with PULENG products and services so as to help us improve, review, develop and efficiently manage the products and services offered; and
- 2.2.1.15 For purposes which are reasonably related to the afore mentioned.

2.3 Furthermore, where permitted under the Data Protection Laws:

PULENG may also collect, use and disclose Personal Information of users for the following additional purposes:

- 2.3.1 To conduct market research and surveys to enable PULENG to understand and determine customer location, preferences and demographics in order to develop special offers and marketing programs in relation to PULENG products and services, and to improve our service delivery and customer experience.
  - 2.3.2 To communicate advertisements involving details of PULENG's products and services, special offers and rewards, either to general customers, or to communicate advertisements which PULENG has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling and telemarketing).
  - 2.3.3 To organise promotional events and corporate social responsibility projects.
  - 2.3.4 For purposes which are reasonably related to the afore mentioned.
- 2.4 In relation to particular products and services or user interactions, PULENG may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- 2.5 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication. Users may contact PULENG using the Head Office contact details found on the main website [www.Puleng.com](http://www.Puleng.com).
- 2.6 Once PULENG receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be reflected on the system. Note that even upon withdrawal of consent for the

receipt of marketing or promotional materials, PULENG may still contact users for other purposes in relation to the products and services held by users or subscriptions to PULENG.

### **3. PROCESSING OF PERSONAL INFORMATION**

- 3.1 By providing Personal Information to PULENG, users acknowledge that the information has been collected from them directly and there is consent for PULENG to process such information.
- 3.2 Where users submit Personal Information (such as name, address, telephone number and email address) via the PULENG Website (e.g. through completing any online form) the following principles are observed in the processing of such information:
  - 3.2.1 PULENG will only collect Personal Information for a specific purpose. The specific purpose for which information is collected will be apparent from the context in which it is requested.
  - 3.2.2 PULENG will only process Personal Information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.
  - 3.2.3 Personal Information will only be processed for the purpose for which it was collected, unless the user has agreed to an alternative purpose in writing or PULENG is permitted in terms of legislation of general application dealing primarily with the protection of Personal Information.
  - 3.2.4 PULENG will keep a record of all Personal Information collected and the specific purpose for which it was collected for a period of 1 (one) year from the date on which it was last used.
  - 3.2.5 PULENG will not disclose user Personal Information relating to any third party, unless prior written consent has been obtained from the user, or where PULENG is required to do so by law.
  - 3.2.6 If Personal Information is released with consent of the user, PULENG will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was released.
  - 3.2.7 PULENG will destroy or delete any Personal Information that is no longer needed by PULENG for the purpose it was initially collected, or subsequently processed.

### **4. DISCLOSURE OF PERSONAL INFORMATION**

- 4.1 PULENG will take reasonable steps to protect Personal Information of users against unauthorised disclosures. Subject to the provisions of any applicable law, Personal Information may be disclosed for the purposes listed above (where applicable), to the following:

- 4.1.1 PULENG's related corporations and employees to provide content, products and services to address user questions and requests in relation to customer accounts, subscription and billing arrangements with PULENG as well as products and services.
- 4.1.2 Companies providing services relating to insurance and consultancy to PULENG.
- 4.1.3 Agents, contractors or third party service providers who provide operational services to PULENG, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to PULENG.
- 4.1.4 Vendors or third-party service providers in connection with marketing promotions and services offered by PULENG.
- 4.1.5 Other telecommunications, content or other service providers to facilitate their provision of content or services, or for interconnection, inter-operability, system operation and maintenance and billing between service providers.
- 4.1.6 Collection and repossession agencies in relation to the enforcement of repayment obligations for debts.
- 4.1.7 Credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness.
- 4.1.8 External banks, credit card companies and their respective service providers.
- 4.1.9 PULENG's professional advisers such as auditors and lawyers.
- 4.1.10 Relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority.
- 4.1.11 Any other party to whom users authorise PULENG to disclose Personal Information to.

## 5. USE OF COOKIES

- 5.1 PULENG uses cookies (a small piece of information that is placed on a user's computer when visiting certain websites) for the following purposes:
  - 5.1.1 To enable certain features and functions on websites, e.g. remembering user-id, favourite channel selections, browsing and other service preferences.
  - 5.1.2 To build up a profile of how users experience the website.
  - 5.1.3 To improve the efficiency of PULENG's website.
  - 5.1.4 To administer services to users and advertisers.
  - 5.1.5 To establish usage statistics.



- 5.2 Most internet browsers provide users with the option of turning off the processing of cookies (please see the “help” section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.
- 5.3 Advertisements on the PULENG website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. PULENG does not control these third parties and their cookie policies. Should users have any questions about PULENG’s Data Privacy Policy, they may contact PULENG.
- 5.4 PULENG is not responsible for the Personal Information policies (including Personal Information protection and cookies), content or security of any third party websites linked to the Website.

## 6. QUERIES

- 6.1 If a user :
  - 6.1.1 Would like to withdraw consent to any use of their Personal Information as set out in this Privacy Statement, they may contact the account executive that manages their account.
  - 6.1.2 Would like to obtain access and make corrections to their Personal Information records, they may contact the account executive that manages their account.
- 6.2 If your Personal Information has been provided to PULENG by a third party (e.g. a referrer), users should contact that organisation or individual to make such queries, complaints, and access correction requests to PULENG on their behalf.
- 6.3 If a user withdraws their consent to any or all use of Personal Information, depending on the nature of such a request, PULENG may not be in a position to continue to provide its products and services to users. In addition, PULENG may not administer any contractual relationship in place, which in turn may also result in the termination of any agreements with PULENG and may result in the user being in breach of contractual obligations or undertakings. PULENG’s legal rights and remedies in such event are expressly reserved.

## 7. GOVERNING LAW

- 7.1 This Privacy Statement and use of the Website shall be governed in all respects by the laws of South Africa.