

PRIVACY POLICY

DATE OF COMPILATION 26 MARCH 2024

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1. INTRODUCTION

This is iCombine Proprietary Limited's Privacy Policy for the use of the Site.

We respect Your privacy and are committed to protecting Your personal information. This Privacy Policy will inform You as to how we look after Your personal information when You visit our Site (regardless of where You visit it from) and tell You about Your privacy rights and how the law protects You.

Capitalised terms used but not defined in this Privacy Policy have the meaning given to them in our website terms of use for the Site.

2. IMPORTANT INFORMATION AND WHO WE ARE

2.1. PURPOSE OF THE PRIVACY POLICY

This Privacy Policy aims to give You information on how We collect and process Your personal information through Your use of this Site, including any information You may provide through this Site when You sign up to our newsletter or take part in a competition.

This Site is not intended for children and we do not knowingly collect information relating to children.

It is important that You read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal information about You so that You are fully aware of how and why we are using Your information. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

2.2. RESPONSIBLE PARTY

We are the responsible party and responsible for Your personal information.

We have appointed an Information Officer who is responsible for overseeing questions in relation to this Privacy Policy. If You have any questions about this Privacy Policy, including any requests to exercise Your legal rights, please contact the Information Officer using the details set out below.

2.3. CONTACT DETAILS

If You have any questions about this Privacy Policy or our privacy practices, please contact our Information officer in the following ways:

Full name of legal entity	iCombine Proprietary Limited
Name	Robert Dennis Noel
Physical Address	84 7th street, Parkhurst, Johannesburg, Gauteng, 2193
Contact Number	083 445 0066
Email address	info@icombine.co.za
Website	www.icombine.co.za

2.4. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our Privacy Policy under regular review. This version was last updated on 26 March 2024.

It is important that the personal information we hold about You is accurate and current. Please keep us informed if Your personal information changes during Your relationship with us.

2.5. THIRD-PARTY LINKS

This Site may include links to third-party sites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about You. We do not control these third-party Sites and are not responsible for their privacy statements. When You leave our Site, we encourage You to read the privacy policy of every site You visit.

3. THE INFORMATION WE COLLECT ABOUT YOU

Personal information has the meaning given to it in the Protection of Personal Information Act, 4 of 2013, (POPIA) and means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, for example information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person.

We may collect, use, store and transfer different kinds of personal information about You which we have grouped together and defined as follows:

- **Identity Information** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Information** includes billing address, delivery address, email address and telephone numbers.
- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments to and from You and other details of products and services You have purchased from us.
- **Technical Information** includes internet protocol (IP) address, Your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices You use to access this Site.
- **Profile Information** includes Your username and password, purchases or orders made by You, Your interests, preferences, feedback and survey responses.
- **Usage Information** includes information about how You use our Site, products and services.
- **Marketing and Communications Information** includes Your preferences in receiving marketing from us and our third parties and Your communication preferences.

We do not collect any **Special personal information** about You. **Special personal information** has the meaning given to it in POPIA and means personal information concerning: (a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or (b) the criminal behaviour of a data subject to the extent that such information relates to: (i) the alleged commission by a data subject of any offence; or (ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect information from and about You including through:

- **Direct interactions.** You may give us Your Identity and Contact information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information You provide when You
 - create an account on our Site;
 - subscribe to our service or publications;
 - request marketing to be sent to You;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.

5. HOW WE USE YOUR PERSONAL INFORMATION

We will only use Your personal information when Applicable Law allows us to. Most commonly, we will use Your personal information in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party to whom the information has been provided).
- Where we need to comply with a legal obligation.
- Where it protects a legitimate interest of Yours.

5.1. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We have set out below, in a table format, a description of all the ways we plan to use Your personal information.

Note that we may process Your personal information for more than one lawful ground depending on the specific purpose for which we are using Your information.

Description of use of Your personal information:

Purpose/Activity	Type of information
To register You	(a) Identity Information (b) Contact
To manage our relationship with You which will include: (a) Notifying You about changes to our terms or Privacy Policy (b) Asking You to leave a review or take a survey	(a) Identity Information (b) Contact Information (c) Profile Information (d) Marketing and Communications Information
To enable You to partake in a prize draw, competition or complete a survey	(a) Identity Information (b) Contact Information (c) Profile Information (d) Usage Information (e) Marketing and Communications Information
To deliver relevant Site content and advertisements to You and measure or understand the effectiveness of the advertising we serve to You	(a) Identity Information (b) Contact Information (c) Profile Information (d) Usage Information (e) Marketing and Communications (f) Technical Information
To use information analytics to improve our Site, products/services, marketing, customer relationships and experiences	(a) Technical Information (b) Usage Information

5.2. CHANGE OF PURPOSE

We will only use Your personal information 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.

If we need to use Your personal information for an unrelated purpose, we will notify You and we will explain the legal basis which allows us to do so.

Please note that we may process Your personal information without Your knowledge or consent, in compliance with the above rules, where this is required or permitted by Applicable Law.

6. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may share Your personal information with third parties for the purposes set out in the table [*Purposes for which we will use Your personal information*] above.

We require all third parties to respect the security of Your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use Your personal information for their own purposes and only permit them to process Your personal information for specified purposes and in accordance with our instructions.

7. COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

8. INFORMATION SECURITY

We have put in place appropriate security measures to prevent Your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process Your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify You and any applicable regulator of a breach where we are legally required to do so.

9. INFORMATION RETENTION

9.1. HOW LONG WILL YOU USE MY PERSONAL INFORMATION FOR?

We will only retain Your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting

requirements. We may retain Your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with You.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of Your personal information, the purposes for which we process Your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances You can ask us to delete Your information in accordance with Applicable Law.

In some circumstances we will anonymise Your personal information (so that it can no longer be associated with You) for research or statistical purposes, in which case we may use this information indefinitely without further notice to You.

10. YOUR LEGAL RIGHTS

Under certain circumstances, You have rights under data protection laws in relation to Your personal information.

If You wish to exercise any of these rights, please contact us using the contact details set out above