



## **C-CONNECT PRIVACY POLICY**

### **1. INTRODUCTION & PURPOSE**

- 1.1. We are committed to protecting the privacy of your Personal Information in our dealings with you and in your interactions with us.
- 1.2. This purpose of this privacy policy (Policy) is to explain to you how C-Connect Telecoms (Pty) Limited (Registration no 2022/544425/07) (including its Affiliates and Representatives) (“C-Connect”, “we”, “our” or “us”) processes personal information when you use the C-Connect Services Online Services and / or our products and services and/or your communications with us.
- 1.3. The Policy explains what information we collect about you, how we may use that information, who we may share it with, when we may share it and how we keep it private and secure. It also explains the rights you have in relation to your personal information.
- 1.4. We will not use your Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure, or access.
- 1.5. We may make changes to this Policy from time to time. When we make these changes, we will publish the updated Policy on our Online Services. If we make any significant changes, we will take additional steps to inform you of these.

### **2. APPLICATION**

- 2.1. When you interact with us and / or provide us with your personal information using Online Services, products You agree to this Policy and authorise us and the relevant third parties referred to in this Policy to process your Personal Information on the basis and for the purposes stated therein consent to the processing and transfer of your personal information.

- 2.2. This Policy will apply to you, as a visitor to the Online Services even if you do not purchase and / or use our products and services.
- 2.3. This Policy must be read together with any other legal notices or terms and conditions provided or made available to you on other pages of our Online Services, when you download any one of our apps and/or when you complete and/or use any documents provided by us to you in respect of any of our products and/or services.
- 2.4. If you do not agree with this Policy, please do not continue to use the C- Connect Services.

### 3. **WHAT TERMS MEAN**

- 3.1. To help you understand this Policy, this is what we mean when we use the following terms and expressions:
  - 3.1.1. **'Affiliates'** means C-Connect's shareholders, subsidiaries, shareholders of subsidiaries and their affiliate companies;
  - 3.1.2. **"Online Services"** means: (a) any Site owned and operated by C-Connect , including the C-Connect website and located at <http://www.c-connect.co.za>, including any page, part or element thereof including, without limitation, all and any information, data, documents, intellectual property, material, products (including software) or services contained in, accessed through, or downloaded or obtained from a Site ; and (b) any other service offered by C-Connect through electronic means, including but not limited to electronic billing platforms, online portals, and interactive customer Sites, and shall include the content and information provided or exchanged as part of such services, and a reference to "Online Service" refers to any one of them as the context may require.
  - 3.1.3. **Personal Information**" means information relating to you and which can be used to personally identify you (including information such as your name, email address, MSISDN number, biometric information, and password, as well as any other personal data further detailed in the POPIA collected), either directly or indirectly.
  - 3.1.4. **"POPIA"** means the Protection of Personal Information Act 4 of 2013;

3.1.5. “**Process**” means everything that we do with your personal information as described in POPIA, including collection, use and storage thereof;

3.1.6. “**Representatives**” means directors, employees, and consultants of C-Connect or any of its Affiliates, their service providers, suppliers, agents and partners; and may refer to any one of them as the context require;

3.1.7. “**Site**” means any electronic platform owned and operated by C-Connect through which you may have access to C-Connect products and services, including without limitation, website, USSD, mobile application, AVM.

#### 4. **WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT**

4.1. We collect Personal Information about you both directly from you and indirectly.

##### 4.2. Directly from you

We collect information directly from you when you provide personal details about yourself, including but not limited to when you:

4.2.1. Visit or Use the Online Services;

4.2.2. purchase products or services from us;

4.2.3. apply or register to become a C- Connect Subscriber;

4.2.4. submit enquiries or comments to us or contact us;

4.2.5. enter any promotions, competitions or prize draws via the services;

4.2.6. register for our Rewards Programme;

4.2.7. interact with our Representatives;

- 4.2.8. redeem Rewards;
  - 4.2.9. use any C-Connect products and services (including where you post on our Sites);
  - 4.2.10. take part in market research; and/or
  - 4.2.11. when you make changes to or terminate your account with us.
- 4.3. This includes:
- 4.3.1. information filled in within application or registration forms, the Online Services and C-Connect products and services you have shown interest in when visiting Sites or requesting a C-Connect product or service, your payment card details if you've saved them, surveys and public posts on our Sites;
  - 4.3.2. personal details like your contact information including name, address, email address and telephone number;
  - 4.3.3. identity information like passport or national identity number; utility provider details; bank statements; tenancy agreements; social media profile information; mobile device and network provider account information (including phone number, handset type, handset model, whether you are a prepaid or post-paid customer, dates of payment owed and received, recharging information, the subscription services you use or any other information related to your account);
  - 4.3.4. demographic information such as age, date of birth, gender and personal interests;
  - 4.3.5. records of any consents you may have given, together with the date and time, means of consent and any related information;
  - 4.3.6. details about your purchases and transaction history with us which may include your C-Connect products and services and your Value-Added Service preferences;
  - 4.3.7. your order history including purchases, recharges, top-ups and Bundle purchases;

- 4.3.8. your payment details including debit or credit card details, banking details and PayPal details, payment amount; payment date;
  - 4.3.9. job and employer details: your job title, role and the name of your employer; where you interact with us in your capacity as an employee of an organisation, the name, address, telephone number and email address of your employer, to the extent relevant;
  - 4.3.10. subscriber details: any information that you may provide to us when filling out our subscriber agreements, credit verification documents, and/or any other consent forms at our offices and/or on our Online Service;
  - 4.3.11. your interactions on our Sites including posts and comments;
  - 4.3.12. your communications with us including requests and complaints;
  - 4.3.13. information provided in surveys, feedback, complaints, or queries;
  - 4.3.14. user login data: login credentials for the Online Services;
  - 4.3.15. records of correspondence and other communications between us, including email, telephone conversations, live chat, instant messages and social media communications; and
- 4.4. Indirectly

We collect information about you indirectly from the Online Services and C-Connect products and services, you use and/ or relevant third parties, such as:

- 4.4.1. when you use any C-Connect products and services, including but not limited to when you visit or browse our Sites or use our mobile network. This includes from the calls you make on the C-Connect network (including call length, how much it costs and where you were when you made them), your browsing history on our website and including the websites you visit and your location data so that, for example, we can connect you to the network;

- 4.4.2. your activity/interactions on our website;
- 4.4.3. browsing and marketing interactions (such as products viewed or selected) on our Sites, social media and email communications with us and our third-party partners;
- 4.4.4. your device location data and Internet Protocol (IP) address;
- 4.4.5. your use of our Online Services and C-Connect products and Services, including but not limited to;
- 4.4.6. phone numbers and/or email addresses of calls, texts, emails and other communications made and received by you and the date, duration, time and cost of such communications;
- 4.4.7. usage data to check compliance with our fair usage policy, where applicable;
- 4.4.8. From third parties including but not limited to those who provide, Value Added Services, our Affiliates with whom you interact, our service providers , and third parties which take payments and manage product orders and dispatch;
- 4.4.9. we may also collect information about you from other sources, including but not limited to credit bureau, credit reference agencies, fraud prevention agencies and business directories and other commercially or publicly available sources;
- 4.4.10. our website uses a website recording service which records mouse clicks, mouse movements and page scrolling. Data collected by this service is used to improve our website usability. The information collected is stored and anonymized and then used for aggregated and statistical reporting. You will not be personally identified;
- 4.4.11. your preferences for particular products, services or lifestyle activities based on the information provided by you to us or when we assume what they are based on your usage of our products and/or services;

- 4.4.12. information about you or those you represent and their relationship with us, including the channels you use and your ways of interacting with us and the Online Services, as well information concerning complaints and disputes;
  - 4.4.13. we may also collect information from commercially and publicly available sources, for example, where you've agreed to share data or the use of cookies, such as Google or social media;
  - 4.4.14. we use cookies and similar technologies to provide us with information about your usage of our website, to support our functionality and to give you the best possible on-line experience. Read our [Cookie Policy](#) to learn more.
- 4.5. The Personal Information we collect about you can vary depending on:
- 4.5.1. the Online Services, C-Connect products and services that you use and subscribe to;
  - 4.5.2. how you have used the C-Connect products and services;
  - 4.5.3. how you have interacted with us even if you are not a customer (including through accessing, visiting and/or using our Online Services and electronically communicating with us);
  - 4.5.4. what we have obtained from a third party with permission to share your Personal Information with us (including law enforcement agents);
  - 4.5.5. when you make your information public; and
  - 4.5.6. subscription to our newsletters and other mailings and interactions with you during the course of our digital marketing campaigns.

## 5. WHAT WE PROCESS YOUR PERSONAL INFORMATION FOR

- 5.1. We use your Personal Information for the operation and administration of our business, the Online Services, provision of our products and services and to grow and improve our business. That includes processing your Personal Information for doing things like:
- 5.1.1. Entering into or performance of a contract: This includes all the processing and pre-assessment activities (including credit vetting) that are required to enable us to sign you up for one or more of our products or services (e.g., verify your identity, assess whether you qualify for the product/service, enrolling you for electronic signatures, etc.) and managing our relationship for the duration of the contract and as required after termination of the customer relationship;
  - 5.1.2. providing you with the products and services you have selected, managing your Account, processing orders, keeping you up-to-date and informed and responding to your enquiries such as notifying you when you are running low in your Account, confirming your Rewards or highlighting C-Connect promotions and competitions we think you will be interested in;
  - 5.1.3. billing you for using our products or services, or to take the appropriate amount of credit from you;
  - 5.1.4. administering our Online Services;
  - 5.1.5. writing reports (including credit and financial reports), carrying out research and number crunching, as well as keeping things secure and preventing crime and fraud, so we can run the business and keep everything safe;
  - 5.1.6. improving and developing our products and services for you and other people interacting with us by
    - 5.1.6.1. Enhancing and personalizing the products and services that we offer you and to develop new products and services;
    - 5.1.6.2. performing analysis and research and monitor usage behaviour;



- 5.1.6.3. aggregating information about you, your spending and your use of the services with information about other users of the services in order to identify trends; and
  - 5.1.6.4. analysing information about you including your calling, searching, browsing and location data on a personalised or aggregated basis;
  - 5.1.6.5. Sometimes we analyse data by combining and anonymising it, so you can't be identified;
- 5.1.7. understanding more about our Subscribers by:
- 5.1.7.1. Providing you with access to parts of our Sites;
  - 5.1.7.2. contacting you if necessary;
  - 5.1.7.3. telling you about any new services or functionality (e.g.: the introduction of a new messaging service);
  - 5.1.7.4. marketing our products and services to you;
  - 5.1.7.5. sending you information about our products and services by email or other means if you have opted in to receiving relevant marketing communications; and
  - 5.1.7.6. sending you information about products and services offered by other companies that we think you might be interested in if you have opted in to receive relevant marketing communications;
  - 5.1.7.7. so that you only receive marketing which is of interest to you (if you've agreed to receive it) and so that we can find and attract new Subscribers who have similar tastes;

- 5.1.8. to build a picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the business and third parties to enable us to remarket to you and to similar audiences;
- 5.1.9. legal, regulatory, or business reasons such as assisting with crime and fraud prevention, assessing credit risk when necessary and ensuring we provide the products and services you have selected to:
  - 5.1.9.1. help us keep your Account safe, e.g.: checking your identity;
  - 5.1.9.2. investigate any complaints or other enquiries that you raise; and
  - 5.1.9.3. assess credit risk, assess the provision of loans, debt tracing, debt recovery, credit management and crime, fraud and money laundering detection and prevention.
- 5.1.10. to protect your legitimate interest and where it is necessary for pursuing the legitimate interest of the responsible party or a third party to whom the information is supplied;
- 5.1.11. checking whether you qualify for our products and services, Rewards or other value-added services, promotions and offers. We may also use automated systems to analyse your information so we can make fair and objective decisions about whether you are eligible for our products and services;
- 5.1.12. for internal management and management reporting purposes, including but not limited to conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis;
- 5.1.13. for safety and security purposes, including to prevent and detect fraud or other crimes, recover debts or trace those who owe us money;

- 5.1.14. Responding to any questions or concerns you may have about using the network, our products or service;
- 5.1.15. making use of technologies that enable us to identify your telephone number (**MSISDN**) if you are accessing our Online Services. This “MSISDN Lookup” capability is only used by us and our trusted partners and is intended to make it easier for you to make use of our services;
- 5.1.16. to ask you if you would like to provide us with feedback on our services and/or events by completing a survey. This is optional. We use feedback from surveys to evaluate our performance and to help improve our future services and/or events; and
- 5.1.17. Using your Personal Information for further specific purposes made clear at the point of collection on particular pages of our Online Services, when you complete our subscriber agreements, consent forms, credit verification documents and/or when you download any of our Online Services.
- 5.1.18. We may record details of your interactions with us, including emails, telephone conversations, live chats, and any other kinds of communication as part of our operations in line with legislation. We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions, such as information about the devices or software that you use;
- 5.1.19. We may also disclose your personal information or information about your usage of our services to certain third parties. This data may identify you personally or may be included in aggregated and anonymised data (which means you will not be identified). These third parties may use this information:
  - 5.1.19.1. to provide you with targeted C-Connect or third party offers, promotions, adverts, or commercial communications if you have opted in to receiving relevant marketing communications;

5.1.19.2. to give them a better understanding of our business; and/or;

5.1.19.3. to provide you with products and services or to improve the products or services you are already receiving.

5.2. We are allowed to use your information in these ways because:

5.2.1. we need it to provide you with products and services and to manage your account with us;

5.2.2. we need to use some of your information to comply with legal and regulatory obligations (such as legal obligations to keep details of calls made by Subscribers for a certain period of time);

5.2.3. we have a legitimate business interest in use of your information (such as conducting market research); and/or

5.2.4. you may have given your consent to us to use your data for certain activities, e.g.: marketing communications.

## 6. **WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?**

We may share your information:

6.1. with our Affiliates and Representatives and third-party partners and service providers, including their current and prospective partners, agents and sub-contractors and our current and prospective partners, suppliers, agents and subcontractors (for example advertisers and content providers) who help us deliver the products and services you've chosen to use and who help us to provide them to you.

6.2. with third parties to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our website. See our Cookies Policy for details;

6.3. with third parties to ensure that you are not shown products which are not of interest to you while you're browsing the internet;

6.4. with debt collection, credit reference and fraud prevention agencies;

- 6.5. if there's an emergency and we think you or other people are at risk;
- 6.6. with third parties to perform analysis and research on customer behaviour;
- 6.7. with any relevant public authority or law enforcement agency, when we have legal or regulatory requirements to do so, or we are ordered by a court of law;
- 6.8. where there is a change (or prospective change) in the ownership of C- Connect to new or prospective owners. In these circumstances we would require them to keep it confidential;
- 6.9. where we (or an affiliate processing your data on our behalf) are required to do so by law, regulation or legal proceedings;
- 6.10. where we believe it is necessary to protect C-Connect or third-party rights and property;
- 6.11. where you give us false or inaccurate information and/or we identify or suspect fraud;
- 6.12. in response to a valid, legally compliant request by a competent authority; and
- 6.13. in response to a complaint that you have breached the services terms & conditions or any other product or service terms.

## 7. **WHEN WILL WE FURTHER PROCESS YOUR PERSONAL INFORMATION?**

We will not process your personal information for a reason other than the reason for which we originally collected the information from you, except:

- 7.1. Where we have obtained your explicit consent for the further processing activity (which includes by virtue of this Policy)
- 7.2. Where personal information is available in or derived from a public record or has been deliberately been made public by yourself.
- 7.3. Where further processing is necessary to comply with an obligation imposed by law or for the conduct of proceedings in court or tribunal.
- 7.4. Where your personal Information is processed for the purpose of any function required or permitted by law to protect members of the public against financial loss due to dishonesty, malpractice, or other serious improper conduct.

## 8. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

- 8.1. We keep your information in line with our data retention policy. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes. This includes managing your account and dealing with any disputes or concerns that may arise e.g., helping us respond to queries or complaints, fighting fraud and financial crime and responding to requests from regulators. If we don't need to retain information for this period, we may destroy, delete or de-identify it. Any information retained on our systems will be kept secure in line with our Information Security Policies and Standards.
- 8.2. We may keep your personal information even if you are no longer our customer or if you request that we delete or destroy it if the law permits or requires us to do so.
- 8.3. If you're not a Subscriber yet, we will delete your data after a reasonable period, unless you become a Subscriber.
- 8.4. In each case, the length of time that we need to keep the information may be different, but we will only keep the information for as long as we need it, or it is legally required.
- 8.5. Law enforcement agencies may be entitled to access this retained data in support of the investigation, detection and prosecution of serious crime.

## 9. YOUR RIGHTS

You have the following rights:

- 9.1. to be informed about how we use your Personal Information (the purpose of this Policy);
- 9.2. to get details of your Personal Information that we hold about you
- 9.3. to rectify / update your information if it's inaccurate or incomplete.
- 9.4. to ask us to delete or destroy your Personal Information. However, there may be circumstances where we need to retain it for legitimate reasons (e.g., so we can keep providing the service or where it is lawful and within the legally permissible retention period);
- 9.5. the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so, although this may impact your ability to continue to have access to our products and services

9.6. the right to object to, and to request that we restrict, our processing of your information. There may be situations where you object to, or ask us to restrict, our processing of your information but we are entitled to lawfully continue processing your information and / or to refuse that request

9.7. the right to make a complaint to the Information Regulator if you think that any of your rights have been infringed by us.

## 10. **INTERNATIONAL TRANSFER OF YOUR PERSONAL INFORMATION**

10.1. We may transfer or store your Personal Information to recipients outside of South Africa.

10.2. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful.

10.3. Your use of our Online Services, followed by your submission of information to us, represents your consent to such transfer.

10.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

## 11. **DATA ACCURACY**

The Personal Information provided to us should be accurate, complete and up to date. Should Personal Information change, the onus is on you to notify us of the change and provide us with accurate information.

## 12. **DATA MINIMISATION**

We will restrict the processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose.

## 13. **HOW DO WE SECURE YOUR PERSONAL INFORMATION?**

13.1. C-Connect is committed to keeping your Personal Information secure. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure.

13.2. In doing so we take the appropriate and reasonable technical and organisational steps to protect your personal information in line with industry best practices by:

- 13.2.1. ensuring that known threats are accounted for. We have implemented administrative, technical, personnel and physical measures to protect your Personal Information against loss, theft and unauthorised use or changes;
- 13.2.2. implementing appropriate security to prevent the processing of your personal information from being accidentally or deliberately compromised. This includes physical and organisational security measures such as restricted user access, responsible information handling, malware controls, encryption or obfuscation or masking, vulnerability, and penetration testing; and
- 13.2.3. using secure methods of transfer when storing or sharing your Personal Information.
- 13.3. Access is only allowed to your personal information from approved employees of C-Connect.
- 13.4. We ensure that if we do share your personal information to third parties, that the necessary safeguards, written agreements, and due diligences are in place to protect your personal information.
- 13.5. Please be aware that communications over the Internet, such as e-mails and webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. C-Connect cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
- 13.6. You are reminded that chat rooms and opinion forums are for public discussion. Any personal information that you choose to supply when you participate in these discussions is widely accessible. Never reveal any personal information such as your telephone number, postal or email address when you participate in these discussions.
- 13.7. Some web pages and Micro Websites included within our website may be co-branded with third party names, logos, or properties. These Micro Websites are operated or maintained by or on behalf of C-Connect. While such third parties are sponsors of these web pages or Micro Websites, the third parties do not share in any personally identifiable information collected within those web pages or Micro Websites unless otherwise stated.
- 13.8. This policy does not apply to third party sites that you may access via our Portals. You should therefore ensure that you are familiar with the applicable third-party privacy policy before entering any personal information on a third-party site.



## 14. DIRECT MARKETING

- 14.1. Where applicable (including where consent is legally required), if you have given your consent to receive direct marketing communications from C-Connect (including its Affiliates and Representatives) your Personal Information will be used to send you marketing material.
- 14.2. We may process your Personal Information for the purpose of providing you with information regarding services that may be of interest to you. In this regard, –
  - 14.2.1. we may tell you about our and our Affiliates and Representatives exclusive offers, products, and other information which we think you may like and may be tailored to suit your needs;
  - 14.2.2. C-Connect Affiliates and Representatives may also share your information with us, and we may use that information to contact you about our products and services;
  - 14.2.3. we may share your information with C-Connect Affiliates and Representatives so that they can contact you about our products and services;
  - 14.2.4. we may also share your information with C-Connect Affiliates and Representatives we have chosen carefully, so they can contact you about their products and services; and
  - 14.2.5. we may contact you with marketing information by using your personal information or with targeted advertising delivered online through social media and platforms operated by other companies using our profiling tools or their own profiling tools or use your personal information to tailor marketing to improve its relevance to you unless you object.
  - 14.2.6. You may opt out of these marketing campaigns for free at any time, you can do this either through a link you will find on the Online Services relating to your product or service; or you may amend or remove your preferences by selecting the unsubscribe option on any mail that we send you and update your preferences.
  - 14.2.7. You can also register on the national do not contact list here [www.dmasa.org](http://www.dmasa.org).

## 15. HOW TO CONTACT US

15.1. If you have any questions, concerns or complaints regarding our processing of your Personal Information in terms of this Policy, please email us at [service@c-connect.co.za](mailto:service@c-connect.co.za) / [info@service@c-connect.co.za](mailto:info@service@c-connect.co.za).

15.2. We will always try our best to resolve any data privacy issue you may have. If you are not satisfied with our response to your complaint or believe our processing of your Personal Information does not comply with the POPIA, you have the right to lodge a complaint with the Information Regulator. The Information Regulator can be contacted as follows:

15.2.1. Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

15.2.2. Address: JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

## 16. GOVERNING LAW

16.1. This Policy shall be governed by and construed and interpreted in accordance with the laws of the Republic of South Africa, and you submit yourself to the jurisdiction of the courts of the Republic of South Africa.

16.2. The terms and conditions of this Policy are severable, in that if any provision is determined to be illegal or unenforceable by any court of competent jurisdiction, then such provision shall be deemed to have been deleted without affecting the remaining provisions of the terms and conditions.

16.3. Our failure to exercise any rights or provision of this Policy shall not constitute a waiver of such right or provision, unless acknowledged and agreed to by us in writing.

**[Latest Revision: 3 July 2023]**