



## PRIVACY POLICY

This Privacy Policy is found and is freely accessible on our website at [www.ticketpro.co.za](http://www.ticketpro.co.za) ("Website") and will apply to all communications, interactions transactions with TicketPro (Pty) Limited (Registration number 2010/003078/07) its subsidiaries, associated companies and divisions ("TicketPro"/ "we"/ "our"/ "us"), notwithstanding the format thereof, whether online, through the Website, in-store, through the TicketPro mobile application ("App") or otherwise.

**Please read and understand this Privacy Policy carefully and note that this Privacy Policy must be read together with the Terms of Service and any other terms and conditions regulating your relationship with TicketPro and shall be incorporated as part thereof.**

**Your use of the Website, the App n for now then- what do you think]and/ or the purchase and/ or use of any of our products or services is subject to this Privacy Policy and indicates your consent to the processing of your Personal Information in line with this Privacy Policy. If you do not agree with any term in this Privacy Policy, please do not use the Website, subscribe to the App, or submit any Personal Information to us.**

### 1. Who are we and what do we do

- 1.1. TicketPro is a private company registered in the Republic of South Africa, which, through its various subsidiaries, divisions and brands\*(<https://www.ticketpros.co.za/portal/web/index.php>) conducts the business ("Business") of promotion, marketing and sale of various products and services (together herein referred to as "Products") to consumers on behalf of relevant suppliers ("Suppliers") and the management and facilitation of customer relationships in respect of such Products via its platforms and websites, being [www.ticketpro.co.za](http://www.ticketpro.co.za), [www.ticketprotravel.co.za](http://www.ticketprotravel.co.za) and [www.smarttap.co.za](http://www.smarttap.co.za) ["Websites"] ("Services").
- 1.2. The Business is conducted using various methods and channels, including onsite, via premises of third parties appointed by TicketPro ("Strategic Partners") (<https://www.ticketpros.co.za/portal/web/index.php/outlets/>) as outlets ("Distribution Outlet") and directly to the public via the Websites, Internet, retail partners, SMS, telephone, E-mail, landing pages, social media platforms, social media sites and other means (together referred to as "Distribution Channels").
- 1.3. This Privacy Policy applies to each Distribution Channel through which Products and Services are sold and/or provided.
- 1.4. "TicketPro"/ "we"/ "us" or "our" includes each business unit, division, branch and/or representative office of any business of TicketPro, holding companies and subsidiaries of TicketPro, and any of TicketPro's associates, cessionaries, delegates or successors in title or duly appointed third parties such as its authorised agents, advisors, partners, service providers and contractors.

### 2. The BLT Group

- 2.1. We are a subsidiary of Blue Label Telecoms Limited, Registration No 2006/022679/06 ("BLT").
- 2.2. BLT has established a central data processing structure for all entities and affiliates forming part of the BLT Group\* of companies ("BLT Group") and Personal Information processed by us will form part of the data of the BLT Group as a whole and may be used by the BLT Group for the purposes contained in this Privacy Policy. This Privacy Policy will apply to such processing.
- 2.3. As such, "TicketPro"/ "we"/ "us" or "our" also includes the companies making up the BLT Group from time to time, including, any holding companies or subsidiaries of BLT Group companies or companies connected to the BLT Group; and any associates, cessionaries, delegates or successors in title or duly appointed third parties such as authorised agents, advisors, partners, service providers and contractors of members of the BLT Group.

### **3. This Privacy Policy**

- 3.1. This Privacy Policy has been published to help you understand our privacy practices by describing how we collect and use your personal information, why we collect it, with whom we share it, and your choices and rights in relation to your personal information. Except as set in this Privacy Policy, we do not share, or sell, or disclose, any personal information collected.
- 3.2. Our Privacy Policy has been developed to provide a framework for the appropriate level of privacy protection and represents our commitment to compliance with South African data protection legislation and any other applicable worldwide data protection laws, to try and achieve the highest standards in protecting your personal information.
- 3.3. If you have any questions, please email us at [info@ticketpros.co.za](mailto:info@ticketpros.co.za).

### **4. Application of this Privacy Policy**

- 4.1. This Privacy Policy applies to Personal Information that we collect from you during any of your communications, interactions and transactions with us, including through any Distribution Channels that link or refer to this Privacy Policy or to personal information that we collect and/or receive from third parties as explained below.
- 4.2. By submitting your details to us or visiting or using any of the Distribution Channels you accept the application of this Privacy Notice and updates thereto and expressly consent to the processing of your personal information in the way described herein.
- 4.3. This Privacy Policy will also apply to personal information held on our database of existing customers ("customer database"). Existing customers on our customer database may request to be removed from the customer database or opt-out of our Services at any time by giving written notice as more fully explained below.
- 4.4. We review our privacy policies regularly and we may change or update them from time to time. The most current version of this Privacy Policy displayed under the Privacy Policy tab of the Website will apply to your interactions with us and will be effective from the date of posting.
- 4.5. We encourage you to periodically review this Privacy Policy to keep informed about how we are protecting your personal information. You can find the last date of changes made to this Privacy Policy for your reference at the end of this document. Your continued use of the Services and/or the Distribution Channels evidences your acceptance of this Privacy Policy and any changes and/ or updates thereto.
- 4.6. Where we use third parties to process personal information on our behalf, this Privacy Policy will apply to such third parties in the processing of your personal information.
- 4.7. This Privacy Policy applies to the relevant member of the BLT Group to the extent that it processes your personal information as BLT Group Data.

### **5. Processing of Personal Information**

- 5.1. Where we refer to "process", it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information.
- 5.2. If you use the Services, purchase Products and/ or access or use the Distribution Channels for any other reason, you agree that we may process your personal information as explained in this Privacy Policy.
- 5.3. When processing, we may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- 5.4. Sometimes you may provide us with specific consent to process your personal information in a particular manner and/ or for a particular purpose. Read the specific consents given carefully, they may limit your rights.

- 5.5. If TicketPro processes personal information for another party like a Service Provider, Strategic Partner or other partner under a contract or a mandate, the relevant Service Provider, Strategic Partner and/ or other party's privacy policy may apply to the processing.

6. **What is Personal Information**

- 6.1. Personal information is defined in POPIA as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, and includes any information that identifies or relates specifically to you, including, for example, your name, age and identity number or other national identifier, your contact address, your location, your banking details, e mail and contact numbers. In short, personal information refers to any information that identifies a person or specifically relates to a person.
- 6.2. Some types of personal information are considered special personal information. These include personal information revealing or related to a person's health, racial or ethnic origin, religious or philosophical beliefs, sex life, political affiliation, or trade union membership; criminal behaviour and proceedings related thereto.

7. **When will we process your Personal Information**

We will only process Personal Information for lawful purposes relating to our business in any one or more of the following circumstances:

- 7.1. you are an existing customer on our customer database. This means you have purchased a Product from us or used our Services;
- 7.2. where you communicate, interact and/ or transact with us, our Strategic Partners and/ or Suppliers;
- 7.3. where you use the NFC Services;
- 7.4. where your personal information is held by another member in the BLT Group and you have agreed to the processing thereof by members of the BLT Group;
- 7.5. if, where required, you have consented thereto;
- 7.6. if you have not requested that we refrain from processing your personal information;
- 7.7. if a person legally authorised by you, the law or a court, has consented thereto;
- 7.8. if it is necessary to conclude or perform under a contract, we have with you;
- 7.9. if the processing is for statistical or research purposes;
- 7.10. if the law requires or permits it; and/or
- 7.11. if it is required to protect or pursue your, our or a third party's legitimate interest.

8. **When will we process your Special Personal Information**

We may process your special personal information in any one or more of the following circumstances:

- 8.1. if you have consented to the processing;
- 8.2. if the processing is needed to create, use or protect a right or obligation in law;
- 8.3. if the processing is for statistical or research purposes and all legal conditions are met;
- 8.4. if the special Personal Information was made public by you;
- 8.5. if the processing is required by law;
- 8.6. if the processing is required to identify you; and/or

- 8.7. if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

9. **What categories of Personal Information we collect**

- 9.1. We may collect a variety of types of personal information for purposes stated in this Privacy Policy, including:

- 9.1.1. identifiers and contact information, such as your identification number, name, address, phone number/s, or email address;
- 9.1.2. purchase or other commercial information, such as the Products and/ or Services you purchase and/ or use, delivery address, and contact information;
- 9.1.3. payment information, such as your chosen payment method, acquiring bank, type of card and
- 9.1.4. profile and account information, which may include contact, purchase, and preference information as well as information about Products and Services you have purchased and/ or used, interaction with vendors at NFC events captured on an NFC chip purchased by you or offers you have shown an interest in and/ or Product or Services review information;
- 9.1.5. communications and interactions, which may include email messages, chat sessions, text messages, and phone calls that we and/ or our Strategic Partners and / or Service Providers exchange with you;
- 9.1.6. demographic information, which may include age or birthdate, gender, postal code, your status as a customer, and other related information about you;
- 9.1.7. call recordings, including information about your call and what you share when you call us or we call you on the phone;
- 9.1.8. location or geolocation information of your device that you use, if your device settings allow us to collect location information;
- 9.1.9. device and browsing information and other Internet activity information, including information about your phone, tablet, computer, or device, and online browsing activity (collectively, "automatically collected information"). Automatically collected information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. Automatically collected information also may include information about when and how you access and use the Distribution Channels or how you interact with us on the Distribution Channels, such as the date and time of your visit or use, the websites you visit before coming and after leaving our Distribution Channels, how you navigate and what you search for using our Distribution Channels, the website pages and items you view using our Website and other Distribution Channels, and the items you purchase or offers you show an interest in; and
- 9.1.10. inferences about any of the information above that may relate to your preferences, or other matters;
- 9.1.11. when we collect information that does not personally identify you, including, information that has been anonymised or aggregated, if we link this information with your personal information, we will treat such linked information as personal information.

- 9.2. You can choose not to provide personal information to us when requested. However, if this personal information is necessary to provide you with Services and Products and / or offers for the aforesaid, access to our Distribution Channels, or to perform administrative functions, we may be unable to do these things.

10. **When and where we obtain Personal Information about you**

- 10.1. We may collect personal information about you from various different sources, including the following:

### 10.1.1. **From you directly**

- 10.1.1.1. From and based on your access to and/ or use of our Services or Distribution Channels.
- 10.1.1.2. From your completed applications and/ or registration for Products and/or Services;
- 10.1.1.3. From and based on your purchase of an NFC chip and your interactions with vendors at an NFC event and your use of NFC Services.
- 10.1.1.4. From and based on your purchase of any Products and/ or use of any Services.
- 10.1.1.5. From and based on your engagement or interactions with Suppliers, Strategic Partners and/ or any other third party duly appointed by us.
- 10.1.1.6. From and based on your engagement or interaction with a member of the BLT Group, where you have consented to members of the BLT Group processing that information as Group Data.
- 10.1.1.7. From and based on how you engage or interact with us on any platform such as on social media, emails, letters, telephone calls, surveys, competitions.

### 10.1.2. **From public domain sources and third parties**

- 10.1.2.1. Public domain (like CIPC) and from third parties we interact with for the purposes of conducting our Business, providing the Products and/ or Services and or administering and/ or operating the Distribution Channels (like partners, reward partners, list providers, our customer loyalty rewards programmes' retail and online partners).
- 10.1.2.2. If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.
- 10.1.2.3. The third parties from whom we may collect Personal Information include, but are not limited to the following:
  - 10.1.2.3.1. our Affiliates and members of the BLT Group, for any of the purposes identified in this Privacy Policy;
  - 10.1.2.3.2. spouses, dependents, partners, employers, joint account holders and other similar sources;
  - 10.1.2.3.3. people you have authorised to share personal information;
  - 10.1.2.3.4. attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
  - 10.1.2.3.5. payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like card scheme providers (e.g., VISA or MasterCard);
  - 10.1.2.3.6. law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
  - 10.1.2.3.7. regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
  - 10.1.2.3.8. credit bureau and other similar verification agencies;
  - 10.1.2.3.9. trustees, Executors or Curators appointed by a court of law;

- 10.1.2.3.10. our Clients, Strategic Partners, Service Providers, agents and sub-contractors like couriers, technology agents and other persons we use to facilitate the Business operation and/ or offer and provide Products and Services;
- 10.1.2.3.11. Suppliers in the supply of their goods and/ or services to you;
- 10.1.2.3.12. Strategic Partners and/ or Suppliers participating in customer loyalty reward programmes;
- 10.1.2.3.13. courts of law or tribunals;
- 10.1.2.3.14. our joint venture partners; and/or
- 10.1.2.3.15. duly appointed and trusted marketing list and lead providers.

10.1.3. **Information we collect automatically**

- 10.1.3.1. Personal information is automatically collected in relation to your visit and use of the Website and App. Such information includes but is not limited to: your browser type and version, as well as your operating system, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the App and/or the Website.
- 10.1.3.2. Cookies are small files sent from a Website to a user's computer drive that can be used to track when a user visits and re-visits a Website and how they behave on a Website. We may use cookies to identify the device with which you access the Website and may use anonymous cookies to determine Website usage analytics and statistics in order to optimise the Website. You are able to manually delete cookies from your browser or set your browser to reject cookies. However, certain pages or features may not be available or work correctly if you have set your browser to reject cookies.
- 10.1.3.3. The Website hosting agents and/or service providers may automatically log your "IP address" which is a unique identifier for your computer and/or other access device. Such information collected is for aggregate purposes only and cannot be used to identify you personally.
- 10.1.3.4. In the event that you subscribe to TicketPro and/or to receive further information through other periodic communications, from TicketPro, your personal information will be processed by TicketPro to provide you with such information and associated processes. All TicketPro communications shall contain an unsubscribe link which you can follow in order to be removed from the relevant list.

10.2. When we collect personal information from these sources it is not in excess of what we require for the conduct of our Business in line with the purpose for which that personal information is collected.

11. **What do we do with Personal Information**

- 11.1. We use personal information for the following reasons but always in line with our Business and the purpose for which it is collected:
  - 11.1.1. to enable the conclusion, implementation, operation and enforcement of transactions you enter into with us, Suppliers or our Strategic Partners for the Products and Services
  - 11.1.2. to facilitate the operation of your relationship with Suppliers;
  - 11.1.3. to respond to your enquiries and complaints;
  - 11.1.4. to process returns and refunds;

- 11.1.5. providing information about Products and/or Services you have requested and notifying you about important changes or developments to these Products and /or Services;
- 11.1.6. to follow up as part of our customer care procedures;
- 11.1.7. updating your records on our customer database and internal record keeping;
- 11.1.8. administering offers and transactions we make and/ or enter into with you;
- 11.1.9. to improve our Products, Services and/ or Distribution Channels;
- 11.1.10. to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- 11.1.11. sending marketing and other communications with the latest specials, deals, alerts, notifications and promotions in relation to our Business, the Products and Services, for marketing those Products and Services and to market related products, goods and services to you;
- 11.1.12. to develop, test and improve products and services for you and making our Services or those of our Clients, Strategic partners and/ or Service Providers easier for you to use;
- 11.1.13. to detect, prevent and report theft, fraud, money laundering and other crimes. This may include the processing of special personal information, like alleged criminal behaviour or like the supply of false, misleading or dishonest information or avoiding liability by way of deception;
- 11.1.14. to enforce and collect on any agreement when you are in default or breach of the agreement terms and conditions, like tracing you or to institute legal proceedings against you;
- 11.1.15. to contact you for market research purposes in relation to our Business or the business of the BLT Group and to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services;
- 11.1.16. evaluating the effectiveness of our marketing and for research, training and statistical analysis;
- 11.1.17. for historical, statistical and research purposes, like market segmentation;
- 11.1.18. to record and/or assist appointed payment processors to process instructions payment instructions (like a debit order or EFT);
- 11.1.19. to manage and maintain your relationship with us;
- 11.1.20. to enable us to deliver Products, Services, documents or notices to you;
- 11.1.21. for security, identity verification and to check the accuracy of your personal information;
- 11.1.22. to communicate with you and carry out your instructions and requests;
- 11.1.23. for customer satisfaction surveys, promotional and other competitions;
- 11.1.24. to enable you to take part in customer loyalty reward programmes, to determine your qualification for participation, earning of reward points, determining your rewards level, monitoring your buying behaviour with our rewards partners to allocate the correct points or inform you of appropriate products, goods and services you may be interested in or to inform our reward partners about your purchasing behaviour;
- 11.1.25. to enable you to take part in and make use of VAS; and/or
- 11.1.26. for any other related purposes.

- 11.2. We may do these things either for TicketPro or on behalf of Suppliers our duly appointed service providers, Strategic Partners, Distribution Outlets, delivery partners and/ or other business partners.
- 11.3. We may contact you by e-mail, telephone, SMS, web notifications, instant chat or social media platforms in relation to the purposes set out in this section and by providing such information you are deemed to have agreed to us contacting you by these methods of communication. We will continue to contact you by way of such methods until you advise us you no longer wish to be contacted by certain methods. Where the communications are necessary for the operation and implementation of your agreement with us, Suppliers, Strategic Partners or any other relevant third party you will need to give us an alternative method of communication.

## 12. **Direct marketing**

- 12.1. As our customer, we may send you direct marketing communications about Products and Services new products, promotions, special offers and other information offered by Us, Suppliers, Strategic Third Parties and/ or, the BLT Group. We may use personal information to market Value Added Services to you including, financial, insurance, investments, credit, cellular phone and other products and services..
- 12.2. We will do this in person, by e-mail, via SMS, WAP Push, newsletters, telephonically, or through instant chat.
- 12.3. You may opt out of receiving marketing materials from us at any time and manage your communication preferences by:
  - 12.3.1. Following the unsubscribe instructions included in each marketing communication from us or telling us you want to unsubscribe;
  - 12.3.2. Sending an email to the sender of the marketing communications; or
  - 12.3.3. Writing to us at us at [info@ticketpros.co.za](mailto:info@ticketpros.co.za); or
  - 12.3.4. registering on the do not contact list of the Direct Marketing Association of South Africa which can be found on [www.dmasa.org](http://www.dmasa.org).
  - 12.3.5. Including your details and a description of the marketing material you no longer wish to receive from us.
  - 12.3.6. We will comply with your request as soon as is reasonably practicable.
- 12.4. If you opt out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our Products and Services which you will be unable to opt out of.
- 12.5. We do not provide your personal information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal information commercially available to unaffiliated third parties.
- 12.6. In all cases you can request us to stop sending marketing communications to you at any time.
- 12.7. If we are providing you with Products or Services, you will also be subject to the specific terms and conditions relating to the Product or Services and those terms will include additional information as to how we or any Suppliers,, Strategic partners and / or Service Providers may contact you.
- 12.8. If the reason you have given us personal information is to receive marketing or other communications from us, we will continue to provide this information to you unless you ask us not to do so.

## 13. **Sharing Personal Information**

- 13.1. In general, we will only share your Personal Information if any one or more of the following apply:
  - 13.1.1. if the law allows it;



- 13.1.2. if, where necessary, you have consented to this;
  - 13.1.3. if it is necessary to conclude or perform under a contract, we or our Strategic Partners, Suppliers or other relevant third parties have with you;
  - 13.1.4. you have specifically consented to sharing your personal information during an interaction or transaction through our Distribution Channels or other communication channel;
  - 13.1.5. if the law requires it; and/or
  - 13.1.6. if it's necessary to protect or pursue your, our or a third party's legitimate interest.
- 13.2. Where required, we may share your Personal Information with the following persons. These persons have an obligation to keep your Personal Information secure and confidential:
- 13.2.1. business units, divisions, branches and/or representative office of any business of TicketPro, holding companies and subsidiaries of TicketPro, and any of TicketPro's associates, cessionaries, delegates or successors in title or duly appointed third parties such as its authorised agents, advisors, partners, service providers and contractors for any of the purposes identified in this Privacy Policy;
  - 13.2.2. Clients, Strategic Partners, Suppliers and other duly appointed service providers;
  - 13.2.3. other members of the BLT Group for any of the purposes identified in this Privacy Policy;
  - 13.2.4. our employees as required to perform their duties;
  - 13.2.5. attorneys and other persons that assist with the enforcement of agreements;
  - 13.2.6. payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like card scheme providers;
  - 13.2.7. law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
  - 13.2.8. regulatory authorities, industry ombuds, governmental departments, local and international tax authorities and other persons the law requires us to share your Personal Information with;
  - 13.2.9. credit bureaux or other similar verification agencies;
  - 13.2.10. our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide Products and Services to you;
  - 13.2.11. persons to whom we have ceded our rights or delegated our obligations to under agreements, like where a business is sold;
  - 13.2.12. courts of law or tribunals that require the Personal Information to adjudicate referrals, actions or applications;
  - 13.2.13. the general public where you submit content to our social media sites like our Facebook page;
  - 13.2.14. trustees, Executors or Curators appointed by a court of law;
  - 13.2.15. participating partners in our customer loyalty reward programmes, where you purchase Products and/ Service or spend loyalty rewards; and/or
  - 13.2.16. our joint venture and other partners with whom we have concluded business arrangements.

#### 14. **What are your rights**

- 14.1. You have the right to:

- 14.1.1. information about your personal details.
- 14.1.2. access free of charge the information about yourself stored by us and its use.
- 14.1.3. correct, destroy, or delete this data.
- 14.1.4. opt-out of direct marketing calls or mail.
- 14.1.5. remove your data from a direct marketing list.
- 14.1.6. object on reasonable grounds to the processing of your personal information.
- 14.1.7. withdraw your consent to the processing of your personal information.

14.2. You also have the right to lodge a complaint with a Regulatory Authority about how we process your Personal Information.

14.3. You may also refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information. The PAIA Manual is located on the following website

## 15. **Updates to this Privacy Notice**

15.1. We may update this Privacy Policy at any time. If we do, we will update the “last modified” section at the bottom of this Privacy Policy.

15.2. We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices.

## 16. **How we secure Personal Information**

16.1. We are committed to protecting your personal information from accidental or unlawful destruction, damage, loss, alteration, unauthorised access or disclosure by using reasonable, appropriate, physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same.

16.2. In all circumstances the information is held by us on our secure systems. We take all reasonable and appropriate technical and organisational steps to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, misuse, unauthorised disclosure, loss, interference, destruction or damage, alteration, disclosure or access.

16.3. Our security systems are in line with industry standards and we monitor developments to ensure that our security systems evolve, as required. We also test our systems regularly.

16.4. Personal information is destroyed or anonymised when no longer needed or when we are no longer required by law to retain it (whichever is the later).

16.5. We will promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information.

16.6. We may store your personal information with the web-hosting service provider appointed by us from time to time. The storage may be in South Africa or in another country.

16.7. Where storage is in another country, your personal information will be stored in a jurisdiction that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to observe data protection requirements equivalent to or better than those applicable in South Africa.

16.8. Notwithstanding the above, no data transmission over the Internet or data storage system can be guaranteed to be completely secure. Please do not send us sensitive information through email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any

account you might have with us has been compromised), you must immediately notify us of the problem by contacting us at info@ticketpro.co.za.

#### 17. **How long do we keep Personal Information**

- 17.1. We will retain your personal information for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:
- 17.1.1. We are under a legal, contractual or other obligation to retain personal information, or as part of an investigation or for litigation purposes;
  - 17.1.2. Personal information is needed to maintain accurate business and financial records;
  - 17.1.3. There are automated means to enable you to access and delete your personal information at any time;
  - 17.1.4. You have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.
- 17.2. We will continue to treat your personal information in accordance with this Privacy Notice so long as we retain it.

#### 18. **When will we use Personal Information to make automated decisions**

- 18.1. An automated decision is made when Personal Information is analysed to make a decision without human intervention in that decision making process.
- 18.2. We may use your Personal Information to make an automated decision as allowed by the law.
- 18.3. You have a right to query any such decisions made and we will provide reasons for the decisions as far as reasonably possible.

#### 19. **Transfer of Personal Information to other countries**

- 19.1. We will only transfer your Personal Information to third parties in another country in any one or more of the following circumstances:
- 19.1.1. where your Personal Information will be adequately protected under the other country's laws or an agreement with the third-party recipient
  - 19.1.2. where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest;
  - 19.1.3. where you have consented to the transfer; and/or
  - 19.1.4. where it is not reasonably practical to obtain your consent, the transfer is in your interest.
- 19.2. This transfer will happen within the requirements and safeguards of the law.
- 19.3. Where possible, the party processing your Personal Information in the other country will agree to apply the same level of protection as available by law in South Africa or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

#### 20. **Cookies and Similar Technologies**

- 20.1. When you access our Sites, we use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links and web beacons. We use cookies to assist us with activities such as:

- 20.1.1. Enabling you to sign in to our Sites;
- 20.1.2. Authenticating you;
- 20.1.3. Keeping track of information, you have provided to us;
- 20.1.4. Improving your browsing experience;
- 20.1.5. Customising our interactions with you;
- 20.1.6. Storing and managing your preferences and settings;
- 20.1.7. Compiling statistical data;
- 20.1.8. Analysing the performance and usability of our Sites;
- 20.1.9. Measuring traffic patterns for our Sites; and
- 20.1.10. Determining which areas of our Sites have been visited.

20.2. These technologies collect information that your browser sends to our Sites including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

20.3. The information that we collect using cookies is non-personal information. You are always free to decline our cookies if your browser permits, but some parts of our websites may not work properly for you if you do so. We do not allow third parties to place cookies on our websites.

20.4. Our Sites may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your activities across our Sites to help us compile aggregated statistics.

## 21. **Links to third party websites and applications**

Our Sites may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party websites and applications. Your use of such sites and applications is subject to the applicable third-party privacy notice and is at your own risk.

## 22. **Personal Information of juristic persons and person related to juristic persons**

22.1. If you are a juristic person (like a company or close corporation), we may collect and use personal information relating to your directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to you. These are related persons.

22.2. If you provide the personal information of a related person to us, you warrant that the related person is aware that you are sharing their personal information with us and that the related person has consented thereto.

22.3. We will process the personal information of related persons as stated in this Privacy Policy, thus references to “you” or “your” in this Privacy Policy will include related persons with the necessary amendments.

## 23. **Disclaimer and Indemnity**

23.1. **Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence or non-compliance with applicable laws.**

23.2. **If you disclose your personal information to a third party, such as an entity which operates a website or mobile application linked to the Distribution Channels or anyone other than TicketPro, TicketPro shall not be liable for any loss or damage, howsoever arising, suffered by you as a result of the disclosure of such personal information to the third party. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.**

24. **How to contact us**

24.1. If you have any complaints, requests or questions about how your personal information is handled by TicketPro, you have a privacy concern or you wish to make a request or a complaint relating to your personal information, please contact us.

24.2. You can reach us at: [info@ticketpro.co.za](mailto:info@ticketpro.co.za)

24.3. You also have the right to lodge a complaint with the Information Regulator at:

SALU Building, 316 Thabo Sehume Street, Pretoria

Ms. Mmamoroke Mphelo

Tel: 012 406 4818

Fax: 086 500 3351

E-mail: [info@justice.gov.za](mailto:info@justice.gov.za)

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