



CALLPAY: PRIVACY POLICY

Ahead Start (Pty) Ltd T/A CALLPAY South Africa, having its address at Unit 92, 5 Beach Estate Blvd, Eden On The Bay, Big Bay, Cape Town, 7441 ("**CALLPAY**" or the "**Company**") respects the privacy of current, future and prospective Users. We are committed to safeguarding your privacy and to acting responsibly and with integrity with regard to protecting your rights and freedoms.

This Privacy Policy tells you about the information the Company may collect on the CALLPAY website and/or its Partners where CALLPAY technology is utilised, how the information is used, how you can access and correct certain information that we may collect and how we safeguard your Personal Information for the purpose of offering you our services.

If you choose to register or submit information to the Company via the CALLPAY website (the "**CALLPAY website**") and/or its Partners where CALLPAY technology utilised, you agree to the use of such data in accordance with this Privacy Policy. Please note that the CALLPAY website may contain links to other websites, including, without limitation, websites maintained by the Company, and other affiliated entities of the Company. Also note that the Company may use third parties to host all or portions of, or to assist in maintaining, the CALLPAY websites.

If you have any questions regarding this Privacy Policy, or do not feel that your concerns have been addressed, please direct your questions to our Information Officer:

Information Officer: Arthur Peace

E-mail: arthur@callpay.com

You acknowledge that you have read and accept the terms of this Privacy Policy and consent to the use of your Personal Information as set out in this Privacy Policy.

BY ACCESSING AND USING THE CALLPAY WEBSITE AND/ OR BY MAKING ANY SUBMISSION OF DATA AND INFORMATION IN WHATEVER FORMAT, THE USER CONSENTS TO THE PROCESSING OF THEIR PERSONAL INFORMATION BY THE COMPANY ON THE BASIS SET OUT IN THIS PRIVACY POLICY. IF THE USER DOES NOT CONSENT, THE USER MUST IMMEDIATELY STOP ACCESSING AND/OR USING THE CALLPAY WEBSITE.

Definitions and Interpretation

In this Privacy Policy, the following words bear the following meanings:

- i. "**child(ren) or minor**" means any natural person under the age of 18 (eighteen) years;
- ii. "**consent**" means any voluntary, specific and informed expression of will in terms of which



- permission is given by or on behalf of a User for the processing of their Personal Information;
- iii. **"data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of CALLPAY;
 - iv. **"data subject"** means the person to whom Personal Information relates and has the meaning ascribed thereto under POPIA;
 - v. **"direct marketing"** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject;
 - vi. **"operator"** means a person or entity who processes Personal Information for or on behalf of a responsible party (i.e. the Company) in terms of a contract or mandate, without coming under the direct authority of that responsible party;
 - vii. **"Our"** or **"We"** or **"Us"** means the Company;
 - viii. **"Personal Information"** has the meaning ascribed to it in Section 1 of POPIA and specifically includes any form of information that can be used to identify a data subject;
 - ix. **"POPIA"** means the Protection of Personal Information Act (Act 4 of 2013), including any regulations or codes of conduct promulgated under it;
 - x. **"process or processing"** means, in relation to Personal Information, any operation or activity or any set of operations, whether or not by automatic means, including:
 - a. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use of information,
 - b. dissemination by means of transmission, distribution or making available in any other form, or
 - c. merging, linking, as well as restriction, degradation, erasure or destruction of information;
 - xi. **"Regulator"** means the Information Regulator established in terms of POPIA;
 - xii. **"responsible party"** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information;
 - xiii. **"special Personal Information "** means Personal Information concerning a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour;
 - xiv. **"CALLPAY website"** means the CALLPAY website or any part thereof which is accessible from www.callpay.com
 - xv. **"User"** means a visitor or user of this CALLPAY website, or any of the content or services associated with the CALLPAY website; and
 - xvi. **"You"** or **"Your"** means each person, group of individuals, entity or entities.



Personal Information Collection

The Company collects, exports, and uses Personal Information to manage your relationship with the Company and better serve you by personalising your experience and interaction with the Company. Such collection is done with appropriate notice and consent, along with required filings with data protection authorities, where required.

The Company may collect your Personal Information through your access and use of the CALLPAY website, web-based applications, or mobile applications, during conversations or correspondence with the Company representatives, or when you purchase goods or services or complete an online application form.

The Company may collect Personal Information from you in connection with:

- i. product or service orders, activations, and registrations
- ii. when you transact using our products and/or services;
- iii. profile creation and User verification for online services
- iv. information requests or complaints
- v. marketing or survey participation, newsletter or support subscriptions
- vi. visits or browsing on the CALLPAY website(s)

The type of Personal Information the Company may collect from you includes, but is not limited to:

- i. personal and/or business contact information, such as initials, first name, surname, identity number and/or date of birth, physical and postal address, telephone and cell phone numbers, and email address
- ii. gender, nationality, age, language preference
- iii. financial information including credit card details and bank log-in credentials
- iv. a User's credit information and history
- v. a User's personal opinions, views or preferences
- vi. other unique information such as User IDs and passwords, product functionality, product and service preferences, contact preferences, educational and employment background
- vii. geo-location data such as your IP address or physical location when you request location-based services
- viii. details of the products and/or services you have (i) signed up and registered for, or (ii) purchased from us and/or third parties or which you have enquired about, together with any additional information necessary to provide those products and/or services and to respond to your enquiries
- ix. any additional information relating to you that you provide to us directly through our CALLPAY websites or indirectly through use of our CALLPAY websites or online presence, through our representatives or otherwise



- x. information you provide to us through our service centre or customer/User surveys from time to time

We do not usually seek special Personal Information from CALLPAY website visitors. We will, where necessary, obtain your express consent to collect and use such information.

The Company may also collect some information that is not Personal Information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how Users use our CALLPAY websites, products or services.

The supply of Personal Information by the User to the Company is voluntary and not mandatory. However, if the User refuses to supply any Personal Information, certain consequences may naturally flow from such a refusal, such as preventing the Company from concluding or performing any contract with the User, preventing you from using our products and/or services. or preventing the Company from complying with one or more of its obligations in law.

Why we collect your Personal Information & The Way We Use Personal Information

The Company shall only collect a User's Personal Information for a specific, explicitly defined and lawful purpose relating to a function or activity of the Company's business.

The Company may use a User's Personal Information for various purposes including, but not limited to, the following:

- i. to onboard a User and enter into a contract with a User
- ii. to perform any obligations under a contract with a User
- iii. to provide our services and enable Users to avail themselves of our services
- iv. to present content to the User in the most effective way for them and their viewing device and browser
- v. to customise and display content including, but not limited to products, articles, listings and advertisement to the User in a way that the Company feels may interest the User or be most beneficial to them
- vi. to send content including, but not limited to products, articles, listings and advertisement content to the User via email or other electronic media, where the User has consented to be contacted by the Company with such content
- vii. to enable the User to voluntarily participate in interactive features on the CALLPAY website
- viii. to contact Users in response to inquiries, comments and suggestions
- ix. to otherwise contact and/or interact with Users
- x. for the specific purpose for which it was volunteered
- xi. to process Personal Information for direct marketing purposes (unless the User has opted out of receiving any direct marketing material)
- xii. to protect a legitimate interest of a User (unless the User has specifically objected in writing to



- all or some of the processing activities on reasonable grounds)
- xiii. to track User use of the CALLPAY website for internal market research
 - xiv. to improve the CALLPAY website and the products and/or services we promote or provide through the CALLPAY website
 - xv. to notify Users about upcoming specials, promotions and events
 - xvi. to notify the User about changes to the CALLPAY website
 - xvii. to pursue its own legitimate interests or the legitimate interests of a third party who it is sharing the information with (unless the User has specifically objected in writing to all or some of the processing activities on reasonable grounds)
 - xviii. to be provided to third-party service providers in connection with the legitimate business purposes of the Company, its contractors or the CALLPAY website
 - xix. to enforce this Privacy Policy as required by law or regulation, or as requested by government or regulatory authorities
 - xx. in connection with an acquisition, merger, restructuring, sale or other transfer involving all or any portion of the business associated with the CALLPAY website

The Parties To Whom Your Information is Disclosed

Your Personal Information may be disclosed for processing to any of the following persons or entities: (i) any companies within our group and their employees who have a need to know such information; (ii) any auditors, contractors or other advisers auditing any of our companies; (iii) any payment processors, banks and/ or financial institutions who assist us in receiving and making payments to and from you, where applicable; (iv) people and organisations who provide a service to us or are acting as our agents, on the understanding that they will keep the information confidential; and (v) anyone to whom we transfer or may transfer all or any part of our business or assets, from whom we acquire any business or assets or who acquires substantially all of the assets of the Company. Any processing performed by any of the aforementioned persons or entities will, if required by law, be governed by an agreement protecting your Personal Information.

Due to the prevailing legal, regulatory, and security environment, the Company may be required, under certain circumstances, to disclose aggregated level and/or personally identifiable information submitted to the Company through the CALLPAY website. The Company will use reasonable efforts to limit such disclosures to the following circumstances: (i) where the Company believes in good faith that it is required to do so in response to a subpoena or other legal process; (ii) where reasonably required to do so in order to maintain, update or otherwise implement the Company's data security measures, equipment, technical operations and the like; (iii) where reasonably necessary to identify, contact, or bring legal action against persons or entities to preserve and/or enforce the Company's rights, including but not limited to enforcing the Website terms and conditions; (iv) protect and defend the rights or property of the Company; or (v) in urgent circumstances to protect the personal safety of the public or of Users of the Company products, services, and the CALLPAY website.



In addition, the Company may also disclose Personal Information in connection with the sale, assignment, or other transfer of the Company business or any part thereof, or as part of a security audit.

While we generally store all of the personal information that we collect about you in South Africa, it is possible that your personal information will be transmitted and hosted outside your region. We ensure that countries to which your information is being shared either have adequate laws in place or that we entered into contractual arrangements to ensure the protection of your personal information.

Children / Minor's Privacy

We define children as individuals under the age of 18 (eighteen). Our Services are not directed to persons under 18. We do not knowingly solicit or collect Personal Information from children under 18. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without such parent or guardian's consent, he or she should contact us. If we become aware that a child under 18 has provided us with Personal Information, we will delete such information from our files, unless required to retain it under applicable laws.

Your Rights in relation to your Personal Information

Where we process your personal information, you have a number of rights over how the data is processed and can exercise these rights at any point. We provide an overview of these rights below together with what this entails for you. You can exercise your rights by submitting a request through the "[Contact Us](#)" form on our website.

- i. The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights.
- ii. The right to access and rectification / correction. You have the right to access, correct or update your personal information at any time.
- iii. The right to object. Under certain circumstances, you have the right to object to certain types of processing, including processing for direct marketing.
- iv. The right to withdraw consent. If you have given your consent to anything we do with your personal information (i.e., we rely on consent as a legal basis for processing your personal information), you have the right to withdraw your consent at any time (kindly note: if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal information at any time by contacting us.
- v. Rights related to automated decision-making. You have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you. In particular, you have the right to:
 - obtain human intervention;
 - express your point of view;
 - obtain an explanation of the decision reached after an assessment; and



- challenge such a decision.
- vi. The right to lodge a complaint with a regulatory authority. You have the right to lodge a complaint directly with the Regulator about how we process your personal information. The Regulators contact details are below:
Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 Website: <https://inforegulator.org.za/>
Tel: +27 (0)10 023 5200
General enquiries: enquiries@inforegulator.org.za
POPIA complaints: POPIAComplaints@inforegulator.org.za

Cookies

We (and/ or other parties whom we duly authorise to do so (for example, third- party advertising services or sponsors)) use cookies and other technologies to enhance your online experience and to learn about how you use our services.

Cookies are pieces of information that a website transfers to an individual's hard drive for record-keeping purposes. The use of cookies is an industry standard, and you will find cookies at most major websites. Cookies help the Company to tailor information to your preferences and to see which areas of the CALLPAY website are frequented most. The Company never uses cookies to retrieve information from your computer that was not originally sent in a cookie. Most browsers are initially set to accept cookies. If you prefer, you can change your browser settings to refuse cookies. However, in so doing, you may not be able to fully utilize the CALLPAY website. For legitimate security reasons, we may refuse access to specific CALLPAY website content unless you accept the use of a cookie or similar device.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms in which the Company and the CALLPAY website participate are subject to the terms and conditions and privacy policies of each social media platform respectively.

You are advised to use social media platforms wisely and to communicate upon them with due care & caution, having regard to their respective privacy and personal details policies.

The CALLPAY website may use social sharing buttons, which help share web content directly from web pages to the social media platform concerned. You are advised before using such social sharing buttons that you do so at your own discretion and risk, and that the relevant social media platform may track and save your request to share a web page through your relevant social media platform account itself.



Banner Ads

Banner ads may be used to advertise our services and/or the promotion(s). The CALLPAY website will track the number of clicks on such ads for analytical and marketing purposes.

Links to Third-Party Websites, Applications, Products, Services, etc

The CALLPAY websites or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the CALLPAY website. The Company does not control those third-party websites or their privacy practices, which may differ from the Company's practices. We do not endorse or make any representations about third-party websites. The personal information you choose to provide to or that is collected by these third parties is not covered by this Privacy Policy. We encourage you to review the privacy policy of any website you interact with before allowing the collection and use of your Personal Information.

We may also provide social media features that enable you to share information with your social networks and to interact with the Company on various social media websites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We similarly encourage you to review the privacy policies and settings on the social media websites with which you interact to make sure you understand the information that may be collected, used, and shared by those websites.

Changes to this Privacy Policy

The Company reserves the right to change, amend or modify this Privacy Policy at any time and without prior notice to you in response to changes in applicable data protection and privacy legislation. Such amendments will be published on the CALLPAY website and will apply from the date of such publication.

Please check the Privacy Policy frequently for changes. Your continued use of the CALLPAY website following the posting of changes to these terms will mean you accept those changes.

The Company will take reasonable measures to notify you if there is a material change in our privacy practices with respect to use of the information you have provided to the Company. The Company will conspicuously post these changes in our Privacy Policy.

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The CALLPAY website was most recently updated in February 2024