



**PRIVACY POLICY, BREACH NOTIFICATION, SHARING OF PERSONAL
INFORMATION AND DATA SUBJECT RIGHTS**

for

IMAGINED EARTH PROPRIETARY LIMITED

(Registration Number 2015/026 592/07)

Prepared in accordance with and in support of:

The Promotion of Access to Information Act 2 of 2000

The Protection of Personal Information Act 4 of 2013

Imagined Earth (Pty) Ltd

Company Registration: 2015/026592/07
CGS Needham, JK Kane, CDS Needham, V Dlamini
20 Talton Road, Forest Town, Johannesburg

Data and Privacy Policy

This privacy policy informs you of your rights as a client and data subject of Imagined Earth. When it comes to your rights as a data subject, we want to ensure that we are transparent with you in all our interactions and transactions and further ensure that you have all the information you need to make informed decisions.

This privacy policy informs you of our privacy practices and the choices you can make in terms of the POPI Act about the manner in which we collect, store and process your personal information.

POPIA & Privacy Statement

Imagined Earth & its registered Information Officer undertakes to at all times comply with the provisions of POPIA Act 4 of 2013 & its prescribed conditions for the protection & lawful processing of any personal information you provide to us.

This policy describes the information we process to support our physical network of equipment, mobile application features and business solutions offered by Imagined Earth and applies to subscribers and users of our services and the information is protected in accordance with law, (e.g. the Privacy Act and the Freedom of Information Act).

Imagined Earth at all times endeavours to comply with the 8 (eight) conditions for the lawful processing of personal information as prescribed in the POPI Act.

These conditions are as follows:

1. Accountability – our company bears the responsibility for ensuring that the conditions for lawful processing are met.

2. Processing Limitation – our company will process your personal information lawfully, minimally, and in accordance with the consent, justification and objection provisions, and with the data subject's (your) consent, unless certain exceptions apply.

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3. Purpose Specification – we will process personal information for a specific purpose and adhere to the retention and restriction of records provisions in the POPI Act.

4. Further Processing Limitation – further processing of information will be compatible with the purpose of collection.

5. Information Quality – we will take reasonably practicable steps to ensure that your personal information is complete, accurate, not misleading and updated.

6. Openness – we will maintain the documentation of all processing operations under our responsibility and will take reasonably practicable steps to ensure that you as the data subject is informed and aware of certain relevant information.

7. Security Safeguards – Imagined Earth will:

(i) take the necessary & appropriate, reasonable technical & organizational measures to secure the integrity & confidentiality of personal information in our possession or under our control;

(ii) ensure that any operator, which processes personal information for the business in terms of a written contract, establishes and maintains security measures; and

(iii) as soon as reasonably possible after the discovery of a compromise or breach, we will notify the Information Regulator and you the affected or impacted data subject of the breach and of the measures we have taken to mitigate or remedy the breach.

8. Data Subject Participation – as our client or data subject we are obliged to allow you to access & correct your personal information. We are also obliged & required by law to correct, delete or destroy your personal information should you request us to do so except where the law requires us to retain your records for a certain number of years.

What kinds of information do we collect?

To provide the Imagined Earth business solutions, we must process information about you. The types of information we collect depend on how you use our products. You can

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request how to delete information we collect by visiting the Imagined Earth website or emailing mypersonaldata@imaginedearth.com.

Information and content, you provide.

We collect the content, and other information you provide when you use our RVMs and mobile applications, including when you sign up for your account, generate or share content or use the rewards and loyalty platform. It can also include what you see through features we provide, such as our barcode scanner to identify products. Our systems automatically process content to analyse context and what's in them for the purposes described below.

Data with special protections: You can choose not to provide racial or ethnic origin.

Your usage.

We collect information about how you use our mobile application such as the types of content you view or engage with; the features you use; the actions you take; the accounts, advertisers you interact with; and the time, frequency and duration of your activities. For example, we log when you scan a can of coke, how many times you have scanned it and how many times you have deposited it.

Information about transactions made on our mobile application.

If you use our mobile application for purchases or other financial transactions (such as when you transfer funds to a loyalty partner or purchase airtime or make a donation), we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information (if applicable); other account and authentication information; and billing, shipping and contact details.

Device Information.

As described below, we collect information from and about the computers, phones, RVMs and other web connected devices you use and we combine this information across different devices you use. For example, we use information collected about your use of our mobile app on your phone to better personalize the content (including ads) or features you see when you use our mobile app on another device, such as your laptop or tablet, or

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to measure whether you took an action in response to an ad we showed you on your phone on a different device.

Information we obtain from these devices includes:

Identifiers:

Unique identifiers, device IDs, and other identifiers, such as Google account logins.

Device signals:

Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.

Data from device settings:

Information you allow us to receive through device settings you turn on, such as access to your GPS location, camera, contacts or photos.

Network and connections:

Information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things like help you stream a video.

Cookie data:

Data from cookies stored on your device, including cookie IDs and settings.

How do we use this information?

We use the information we have (subject to choices you make) as described below and to provide and support the Imagined Earth business case.

Here's how:

Provide, personalize and improve our Products.

We use the information we have to deliver our service offering, including to personalize content (including your News Feed, Rewards, Products Feed, Profile, Wallet, Scanning and ads) and improve the relevance of information and suggestions for you (such as solutions, companies or events you may be interested in). To create personalized solutions, we use your activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our RVMS; the rewards you choose, the loyalty you choose and the features and offerings you partake in.

Information on the mobile application features.

We connect information to provide a more tailored seamless, convenient and consistent experience on mobile application features. For example, by automatically filling in your registration information (such as your phone number) on forms, loyalty and call to actions. Location-related information can be based on things like precise device location (if you've allowed us to collect it), IP addresses, and information from your mobile application or in field RVMS.

Research and development.

We use the information we have to develop, test and improve our service offering, mobile application, RVM offering which will include conducting surveys and research, and testing and troubleshooting new products and features.

Ads and other sponsored content.

We use the information we have about you including information about your consumption habits, actions and connections to select and personalize ads, offers and other sponsored content that we show you.

Provide measurement, analytics, and other business services.

We use the information we have to help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services.

Communicate with you.



We use the information we have to send you marketing communications, communicate with you about our offerings, and let you know about our terms and conditions. We also use your information to respond to you when you contact us.

Research and innovate for social good.

We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of sustainability, general social welfare and technological advancement.

Sharing of Personal information

Imagined Earth will not share your personal information with third parties. We will only share your personal information if we have first obtained your written consent and only if there is a legitimate purpose for doing so or if we are otherwise required by law to do so.

How is this information shared?

Your information is shared with others in the following ways:

Apps, websites, and third-party integrations on or using our mobile or physical offerings.

When you choose to use third-party apps, websites, loyalty, rewards or other services that use, or are integrated with, our mobile and hardware offering, they can receive information about you. Information collected by these third-party services is subject to their own terms and policies.

New owner.

If the ownership or control of all or part of our business offerings including our physical network changes, we may transfer your information to the new owner.

Advertisers.

We provide advertisers with aggregated reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission. For example, we

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provide general demographic and interest information to advertisers (for example, that an ad was seen by a woman between the ages of 25 and 34 who lives in Durban and drinks Coca Cola Original) to help them better understand their audience.

Measurement partners.

We share aggregated information about our subscribers to partners to provide analytics and measurement reports (such as the total number of PET units collected for February at a specific location)

Partners offering goods and services in our mobile application

When you buy something from a seller in our Products, the content creator or seller can receive your public information and other information you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

Vendors and service providers.

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analysing how our mobile application and RVMs are used, providing customer service, facilitating payments or conducting surveys.

Security, Intrusion, and Detection:

For site security purposes and to ensure that this service remains available to all users, our computer system employs software programs and hardware devices to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. We impose strict restrictions on how our partners can use and disclose the data we provide.

Imagined Earth shall at all times ensure that the appropriate security safeguards are in place & will take all reasonable steps including the appropriate, technical & organisational measures to secure the integrity & confidentiality of personal information in our possession or under our control to prevent the loss, damage or unauthorised destruction of personal information and unlawful access to or processing of personal information."

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Breach Notification

In the event that Imagined Earth experiences an information or data breach and/or where there are reasonable grounds to believe that personal information has been accessed or acquired by any unauthorized person, our company will notify the Information Regulator and you, our client or data subject as soon as is reasonably possible after we have discovered the security breach.

In terms of the obligations of our company, where we process personal information on behalf of another business or company, whether it be in terms of a contract or a mandate, we will notify that business or company immediately where there are reasonable grounds to believe that personal information has been accessed or acquired by any unauthorized person.

Data Subject Participation & Your Rights concerning your Personal Data:

As a data subject under the POPIA law & as our valued customer you have a right of access & review of your personal information.

Rights as a Data Subject.

Your Rights as a Data Subject under POPIA are:

As a data subject you have a right to access and review any personal information about you that we hold.

You have a right to know how we collect, store and process or otherwise use your personal information.

You have a right to request a copy of the personal information we hold about you in an accessible format.

You have a right to correct and amend any personal information we hold about you that is either inaccurate, misleading or incomplete.

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Under certain circumstances and in compliance with the relevant applicable laws of South Africa, you have a right to be forgotten and/or left alone and request that we delete or erase personal information we hold about you in our records.

You have a right to restrict the further processing of your personal information.

You have a right to object to certain types of processing of your personal information such as direct marketing and/or receiving newsletters from us.

You have a right to lodge or submit an objection or complaint with our Information Officer or with the Information Regulator if you are not happy or satisfied about any aspect involving the processing of your personal information.

Contact Us:

If you wish to enquire about how your personal information is being processed by Imagined Earth, or if you wish to view your personal information, or object to the collection of your personal information, or request the amendment, correction, deletion or destruction of your personal information, or withdraw consent for the processing of your personal information, or for any query regarding the handling of your personal information please contact our registered Information Officer: **Justin Needham** (Information Officer) via email mypersonaldata@imaginedearth.com

You also have a right to submit a complaint to Imagined Earth's Information Officer and/or directly to the Information Regulator.

How will we notify you of changes to this policy?

We'll notify you before we make changes to this policy and give you the opportunity to review the revised policy before you choose to continue using our business offering.