

d6 GROUP PRIVACY NOTICE

d6 group (Pty) Ltd, Zipalong (Pty) Ltd and the d6 Group Employee Share Trust ("We" or "d6 Group") are committed to protecting and respecting your privacy.

This notice sets out the basis on which we will process your personal information that we collect from you or any other source, or that you provide to us. This notice extends to any personal information about a child under the age of 18 for whom you are responsible.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

This Notice aims to inform you about your rights over your data when you visit any d6 or Zipalong website ("**our sites**"), or by utilising our services, participating in social media functions on our site, completing a survey, using any of our login facilities ("**Portal**") or any similar data collection point.

For the purpose of the Protection of Personal Information Act 4 of 2013 ("**POPI**"), the responsible party is d6 group (Pty) Ltd, Zipalong (Pty) Ltd or the d6 Group Employee Share Trust. For the purpose of the General Data Protection Regulation, 2016/679 ("**GDPR**") the data controller is d6 group (Pty) Ltd, Zipalong (Pty) Ltd or the d6 Group Employee Share Trust. POPI and GDPR are hereinafter referred to as the "**Acts**".

The address of the responsible party/controller is 3rd Floor, Pegasus Building 1, 210 Amarand Avenue, Menlyn Maine, Pretoria, South Africa, 0081.

The details of our Information Officer for the purposes of the Acts is as follows:

	d6	Zipalong
Information Officer	Wilhelm Erich Kitshoff	Wilhelm Erich Kitshoff
Physical Address	3rd FLOOR PEGASUS BUILDING 1 210 AMARAND AVENUE MENLYN MAINE PRETORIA SOUTH AFRICA 0081	3rd FLOOR PEGASUS BUILDING 1 210 AMARAND AVENUE MENLYN MAINE PRETORIA SOUTH AFRICA 0081
Postal Address	3rd FLOOR PEGASUS BUILDING 1 210 AMARAND AVENUE MENLYN MAINE PRETORIA SOUTH AFRICA 0081	3rd FLOOR PEGASUS BUILDING 1 210 AMARAND AVENUE MENLYN MAINE PRETORIA SOUTH AFRICA 0081
Telephone No	087 820 0088	087 820 0088
Fax No	086 536 7148	086 536 7148
Email Address	privacy@d6.co.za	privacy@d6.co.za

1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- 1.1. **Information you give us.** You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our services, participate in social media functions on our site, complete a survey, use our login facility (“**Portal**”) and when you report a problem with our site or Portal. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph. We only collect images when you explicitly upload an image as part of a form submission
- 1.2. **Information we collect about you.** With regard to each of your visits to our site or Portal we may automatically collect the following information:
 - 1.2.1. Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - 1.2.2. Information about your visit, including the full Uniform Resource Locators (URL); clickstream to, through and from our site (including date and time); services/products you viewed or searched for; page response times, page errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- 1.3. **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide or where you have authorised us to collect information from selected third parties. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our site or the Portal. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- 1.4. **Google User Data.** We may receive information about you from Google should you make use of any of our Google integration features. This information will be used solely to render the integration service and will not be used for any other purpose.
 - 1.4.1. Google Calendar integration
 - 1.4.1.1. The d6 products offer Google Calendar integration.
 - 1.4.1.2. Should the product system user choose to link their Google Calendar to a calendar in the system, they will be prompted to allow the system to see, edit, share calendars that the user can access using Google Calendar on their account.
 - 1.4.1.3. These permissions are requested in order to facilitate the integration between the system and the users Google Calendar.
 - 1.4.1.4. User data collected by the system during this process will be used exclusively to facilitate the integration functionality, and will not be used for any other purpose.
 - 1.4.1.5. Use of information received by the system from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

- 1.5. **Cookies.** Cookies may be used by us to understand the users of our site better. Cookies allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website. Depending on the type of cookie we use, cookies also allow us to make our sites more user friendly, for example, permanent cookies allow us to save the user's password so that the User does not have to re-enter it every time the user visits our site;
- 1.5.1. You can usually adjust your browser so that your computer does not accept cookies. If you do this, you will still be able to browse around the site but the functions that allow you to access an existing account or page that requires a username or password, may not be available;
- 1.5.2. Alternatively you can adjust your browser to tell you when a website tries to put a cookie on your computer. How you adjust your browser to stop it accepting cookies or to notify you of them, will depend on the type of internet browser programme your computer uses;
- 1.5.3. Minimal information about you or your browsing activity may be shared with third parties, such as Google, to assist us with analytics of our website usage;
- 1.5.4. Your browser also generates other information, including which language the site is displayed in, and your Internet Protocol address ("**IP address**"). An IP address is a set of numbers which is assigned to the User's computer during a browsing session whenever the User logs onto the Internet via your internet service provider or your network (if you access the Internet from, for example, a computer at work). Your IP address is automatically logged by our servers and used to collect traffic data about visitors to our sites. We do not use your IP address to identify you personally;
- 1.5.5. Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

2. IS THE SUPPLY OF INFORMATION VOLUNTARY OR MANDATORY

- 2.1. Supplying certain types of information is voluntary and you will be given the opportunity to "opt-out" of supplying such information, however other types of information are mandatory to enable us to process requests by you for services.
- 2.2. Whenever our intention is to target you with digital advertising or direct marketing the supply of your information is always optional, we will make that clear to you and ask you to opt-in and provide specific information intended to be used for that purpose.

3. CONSEQUENCE OF FAILURE TO PROVIDE THE INFORMATION

- 3.1. In respect of any information we require which is mandatory in order to render services to you, in the event you:
- 3.1.1. Refuse to provide your personal information which we request;
- 3.1.2. Do not consent to us handling your personal information in accordance with this Privacy Notification; or
- 3.1.3. Revoke any consent regarding the handling of your personal information by us which you have previously given,

then such refusal or revocation of previously given consent might prevent us from performing our services.

4. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- 4.1. **Information you give to us.** We will use this information to:
 - 4.1.1. Carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - 4.1.2. Provide you with information about other services we offer that are similar to those that you have already acquired or enquired about;
 - 4.1.3. Provide you with information about goods or services we feel may interest you and are aligned with our product and service offerings. We will only contact you with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you;
 - 4.1.4. Ensure that content from our site or the Portal is presented in the most effective manner for you and for your computer;
 - 4.1.5. Deal with enquiries and complaints made by or about you relating to our site.
- 4.2. **Information we collect about you.** We will use this information:
 - 4.2.1. To administer our site, Portal and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 4.2.2. To improve our site or Portal to ensure that content is presented in the most effective manner for you and for your computer;
 - 4.2.3. To allow you to participate in interactive features of our service, when you choose to do so;
 - 4.2.4. As part of our efforts to keep our site safe and secure;
 - 4.2.5. To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - 4.2.6. To make suggestions and recommendations to you and other users of our site (including the Portal) about goods or services that may interest you or them.
- 4.3. **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- 4.4. **Submission of Personal Information on behalf of another:** Kindly take note that if you provide information on behalf of someone else on our sites or portals, d6 will ensure that the individual is aware of the information captured and will make this notice known to them. Our customers may capture information about individuals into our systems. In that instance, our customer is acting as the responsible party, d6 acts as an operator providing platform services to the customer under contract to that customer. We assume that such customer is processing that personal information lawfully in adherence with POPIA. This notice does not apply to the individuals represented by that data.

5. DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act 2008.

- 5.1. We may share your information with selected third parties including:
 - 5.1.1. Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
 - 5.1.2. Service Providers that provide information processing services to us. In those circumstances those third parties shall be required to enter into a non-disclosure agreement on no less stringent terms than found in this privacy notice and to process and protect your personal information in accordance with our instructions.
 - 5.1.3. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisements on any given day).
 - 5.1.4. Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 5.2. We may disclose your personal information to third parties:
 - 5.2.1. In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
 - 5.2.2. If we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our customers will be one of the transferred assets.
 - 5.2.3. If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of use applicable to any particular site of ours or terms and conditions of supply of our services to you and other agreements; or
 - 5.2.4. To protect our rights, property, or safety, or the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6. WHERE WE STORE YOUR PERSONAL INFORMATION

- 6.1. The data that we collect from you may be transferred to, and stored at a destination outside the Republic of South Africa (“**RSA**”) or the European Union (“**EU**”). It may also be processed by staff operating outside the RSA or the EU who work for us or for one of our suppliers/service providers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice and in a manner consistent with the Acts.

- 6.2. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.3. Records of personal information will not be retained for longer than is necessary for operational or archiving purposes for which the information was collected, unless retention of record is required or authorised by law. Records of personal information may be retained for periods in excess of those contemplated for historical, statistical or research purposes, subject to us establishing appropriate safeguards against the records being used for any other purpose and or we have de-identified the record(s).
- 6.4. Unfortunately, the transmission of information via the internet is not completely secure. We undertake organisational and technical measures to protect your personal information in line with generally accepted practices. We cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. In the event of a security compromise, d6 will ensure that you are informed in writing as soon as possible, within the constraints of the Acts, and that you are provided, as far as possible, with information needed to help you mitigate against potential adverse effects, if any.

7. SOCIAL MEDIA PLATFORMS

- 7.1. Communication, engagement and actions taken through external social media platforms that we, our directors or employees participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- 7.2. You are advised to use social media platforms wisely and communicate / engage with them with due care and caution in regard to their own privacy and personal information. We will never ask for personal or sensitive information through social media platforms and encourage users, wishing to discuss sensitive details or to resolve issues/concerns, to contact us through primary communication channels such as by telephone or email.
- 7.3. Our social networks page(s) may share web links to relevant web pages. By default some social media platforms shorten lengthy URL's. You are advised to take caution and good judgement before clicking any shortened URL's published on social media platforms by this website. Despite the best efforts to ensure only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.
- 7.4. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

8. INTERCEPTION AND MONITORING OF COMMUNICATIONS

- 8.1. We reserve the right to intercept, monitor, copy or block communications to and from our communication facilities (including but not limited to our site, Portal, email, SMSs etc.) in accordance with the relevant provisions of the law.

9. YOUR RIGHTS

- 9.1. **Right to object:** You have the right to object to us using your personal information.

- 9.2. **Withdraw consent:** Where we have obtained your consent to process your personal information for certain activities, you may withdraw your consent at any time.
- 9.3. **Direct Marketing:** You have the right to ask us, at any time, not to process your personal information for direct marketing purposes by any means, whether digital or any other medium. We will always inform you and obtain your express consent (before collecting your data) if we would like to use your data for direct marketing by means of electronic messaging (e.g. newsletters, adverts via SMS, targeted digital advertising, etc) or if we would like to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking “opt-in” boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at privacy@d6.co.za or use the unsubscribe functionality on our email or other communications.
- 9.4. **Access to information:** You have a right to see/access your personal information that we keep about you. You may instruct us to provide you with any personal information we hold about you upon receipt of a written request.
- 9.5. **Deletion or correction of information:** You have the right to request the deletion or correction of your personal information that we keep about you. You may request that we delete any personal information we hold about you upon receipt of a written request, which will be subject to the retention requirements of prevailing legislation. We may also refuse or limit the right to erasure should that information be necessary for:
- 9.5.1. The exercising of the right to freedom of expression and information;
 - 9.5.2. Compliance with a legal obligation or performance of a task carried out in the public interest;
 - 9.5.3. The establishment of, exercise of, or defense against legal claims.
- 9.6. **Contact:** In order to exercise your rights, please send an email to privacy@d6.co.za. You also have the right to lodge a complaint to the Information Regulator:

Authority:	The Information Regulator of South Africa
Email Address & Website	POPIAComplaints@inforegulator.org.za – should you feel that your personal information has been violated, you may use this e-mail address to lodge a complaint www.inforegulator.org.za/contact-us
Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

Where requests are found to be repetitive in nature, manifestly unfounded or excessive, we may refuse an access request. If a request is refused we will inform you of the decision and provide reasons for the refusal.

10. CHANGES TO OUR PRIVACY NOTICE

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate (not obliged), notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

11. CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to privacy@d6.co.za.

[Click here to see any changes to this Privacy Notice](#)