



PRIVACY POLICY

1. INTRODUCTION

- 1.1. This Privacy Policy governs the way **Span Africa (Pty) Ltd** (Registration Number: 2010/009691/07) ("**Span Africa**", "**we**", "**us**", or "**our**") processes Personal Information in accordance with the **Protection of Personal Information Act 4 of 2013 ("POPIA")**, the **Electronic Communications and Transactions Act 25 of 2002 ("ECTA")**, and other applicable legislation.
- 1.2. We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.
- 1.3. This Privacy Policy may be updated from time to time. The latest version will always be available on our website and will take effect immediately upon publication. Continued use of our services signifies your acceptance of the updated terms.
- 1.4. By using our website or engaging with our services, you agree to the terms of this Privacy Policy. If you do not agree, you must refrain from using our website or services.

2. SCOPE OF APPLICATION

- 2.1. This Privacy Policy applies to:
 - 2.1.1. All natural and juristic persons interacting with Span Africa's services and platforms;
 - 2.1.2. Personal Information collected through our website, online platforms, and third-party integrations;

- 2.1.3. Any Personal Information submitted to or received by Span Africa via any channel.

3. LEGAL GROUNDS FOR PROCESSING

- 3.1. In accordance with Section 11 of POPIA, we process Personal Information on the following legal grounds:
 - 3.1.1. With your consent;
 - 3.1.2. When it is necessary to carry out or conclude a contract;
 - 3.1.3. To comply with a legal obligation;
 - 3.1.4. To protect your legitimate interests;
 - 3.1.5. To pursue our legitimate interests or those of a third party.

4. DEFINITION OF PERSONAL INFORMATION

- 4.1. “Personal Information” means information relating to an identifiable, living, natural person or an identifiable juristic person, including but not limited to:
 - 4.1.1. Names, surnames, and company names;
 - 4.1.2. Identity or registration numbers;
 - 4.1.3. Email addresses and contact numbers;
 - 4.1.4. Location and demographic information;
 - 4.1.5. IP addresses and online identifiers;
 - 4.1.6. Financial, payment, and transaction information;
 - 4.1.7. Preferences and engagement data.

5. METHODS OF COLLECTION

- 5.1. We may collect Personal Information through the following means:
 - 5.1.1. Direct interactions (e.g., forms, calls, emails, physical meetings);
 - 5.1.2. Automated website usage information technologies (e.g., cookies, tracking pixels);
 - 5.1.3. Third-party integrations and partners (e.g., Meta, Google, advertising platforms).
 - 5.1.4. We will mainly collect information directly from you where you provide us with your personal details. Where possible, we will inform you what

information you are required to provide to us and what information is optional.

6. PURPOSES FOR PROCESSING

- 6.1. We process your Personal Information for the following purposes:
 - 6.1.1. To provide our products and services;
 - 6.1.2. To manage our relationship with you;
 - 6.1.3. To send marketing communications where lawful;
 - 6.1.4. To analyse website usage and improve functionality;
 - 6.1.5. To comply with legal and regulatory obligations;
 - 6.1.6. To detect and prevent fraud and unauthorised access;
 - 6.1.7. To manage Meta ad targeting in compliance with Meta's updated regulations.

7. USE OF COOKIES AND TRACKING TECHNOLOGIES

- 7.1. Our website uses cookies to:
 - 7.1.1. Track and improve your browsing experience;
 - 7.1.2. Analyse site traffic and usage patterns;
 - 7.1.3. Store user preferences and login information;
 - 7.1.4. Deliver tailored content and advertisements.
- 7.2. You can disable cookies via your browser, but this may affect your website experience.

8. CONSENT AND MARKETING

- 8.1. By submitting your Personal Information, you consent to the processing as outlined herein.
- 8.2. We may use your Personal Information to contact you for marketing purposes where:
 - 8.2.1. you have provided explicit consent;
 - 8.2.2. you are an existing customer and we market similar services.
- 8.3. You have the right to withdraw consent at any time by contacting us.

9. DISCLOSURE OF PERSONAL INFORMATION

- 9.1. We may disclose your Personal Information to the following parties:

- 9.1.1. Our employees and authorised representatives;
- 9.1.2. Third-party service providers involved in the delivery of products or services to you;
- 9.1.3. Third-party service providers acting on our behalf (e.g., payment processors, cloud providers);
- 9.1.4. Legal or regulatory authorities;
- 9.1.5. Third parties involved in corporate restructuring, mergers, or acquisitions;
- 9.1.6. Meta, in accordance with its platform policies and privacy standards.
- 9.1.7. Operators will process your Personal Information only per our instructions and legal agreements.
- 9.2. We may also disclose your information where we have a duty or a right to disclose in terms of the law or industry codes or where we believe that it is necessary to protect our rights.

10. **CROSS-BORDER TRANSFERS**

- 10.1. Personal Information may be transferred to recipients in other countries:
 - 10.1.1. Where the jurisdiction provides adequate data protection;
 - 10.1.2. Where consent has been provided;
 - 10.1.3. Where necessary for contractual performance.
- 10.2. We ensure that appropriate safeguards are in place to protect your information in such transfers.

11. **SECURITY MEASURES**

- 11.1. We implement reasonable technical and organisational measures to protect your Personal Information.
- 11.2. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.
- 11.3. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.
- 11.4. While we strive to protect your data, we cannot guarantee complete internet security.

12. **RETENTION OF PERSONAL INFORMATION**

- 12.1. We will retain Personal Information only for as long as necessary:

- 12.1.1. To achieve the purposes stated in this policy;
- 12.1.2. To comply with legal, regulatory, and contractual obligations;
- 12.1.3. For legitimate business and statistical purposes (in de-identified form where applicable).

13. **YOUR RIGHTS UNDER POPIA**

- 13.1. As a data subject, you have the right to:
 - 13.1.1. Request access to Personal Information we hold about you;
 - 13.1.2. Request correction, deletion, or destruction of inaccurate or unlawful information;
 - 13.1.3. Object to the processing of your Personal Information;
 - 13.1.4. Withdraw consent at any time;
 - 13.1.5. Lodge a complaint with the Information Regulator.
- 13.2. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you.

14. **CONTRACT INFORMATION:**

- 14.1. If you have any queries about this privacy policy or you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, or for any other reason relating to your personal information or this policy, please contact us at the numbers/addresses listed on our website.
- 14.2. Should you wish to contact the POPIA Information regulator, you can do so via their website : <https://inforegulator.org.za>