

# Privacy Policy

This Privacy Policy (the “Privacy Policy”) describes how Jenny Internet (Pty) Ltd, collects, uses, and discloses information from and about you when you visit our website and/or use our products and services.

Jenny Internet is committed to safeguarding and preserving your rights to your Personal Information. We will always treat your Personal Information as strictly confidential.

“**Personal Information**” includes, but is not limited to, your name, email address, contact number, physical address, location, online identifier, biometric information and personal views and opinions.

## Collection of Personal Information

Jenny Internet will collect your information where we have a legitimate business interest; in order to perform our contractual duties; to comply with our legal duties; or where you have provided your consent.

When you request information about a particular product or service, sign up as a user of our services, or otherwise contact us, we may collect information such as your name, telephone number, email address, and location.

Jenny Internet may automatically collect information from you when you visit our website by using cookies and similar technologies.

## Cookies and Similar Technologies

We use cookies and similar technologies (such as google analytics, pixel tags and web beacons) in order to enhance your interactive experience on our websites and generally improve the service which we offer you as well as to enable us to advertise our products and services to you, that you have shown interest in.

Cookies are small files of data that we store on your device when you access our website, this allows us to collect information such as your internet protocol address, your browser type, location, and device information.

You have the ability to accept or decline cookies, and this can be done via your browser settings.

## Use of Personal Information

We will use the Personal Information that we collect from and about you for one or more of the following purposes:

- When you have requested information about our products and/or services, to respond to your request;
- To provide you with products and/or services that you have contracted for;
- To market our products and services to you;
- To improve our products and/or services;
- To improve our website functionality;
- To inform you of any changes to our products and/or services;
- For market research purposes;
- To provide you with technical and administrative support;
- As otherwise required by law; and
- For reasons not described in the Privacy Policy where the reason for processing is consistent with the purpose for which we originally collected your information; and/or where we have a legitimate business interest, and where such use is lawful.

## Disclosure of Personal Information

Jenny Internet may disclose your information in the following circumstances:

- The Jenny Group of Companies: we may share your data within the Jenny Group to enable us to provide our services to you, fulfil our contractual obligations with you, and to provide you with adequate support;
- Where you have consented to the sharing of your information for marketing and promotional purposes;
- Suppliers and Service Providers: Jenny Internet uses third party suppliers and service providers who provide us with technical, professional and support services, including but not limited to, payment providers; marketing services; debt collection services, identity verification services; courier services; hosting and maintenance services;
- Legal and Regulatory: to satisfy any applicable law, regulation, legal process, or governmental request, this includes, to the Independent Communications Authority of South Africa for the purpose of compiling, verifying or auditing any reports, accounts or other information required under Jenny Internet's license or in terms of the Electronic Communications Act, 2005 and the regulations made pursuant to that Act; and/or when directed by a court order;
- Fraud Prevention and Detection: where we suspect fraudulent activity on your account or as a result of utilizing our products and/or services.
- International Transfer: data is hosted in Jenny Internet's local server in South Africa.
- Sale or Transfer of Business Assets: we may share your Personal Information in a business transfer in the event that there is an acquisition or merger.

## Data Retention and Security Measures

We shall retain your Personal Information for the duration of our relationship with you. In some circumstances, we may retain your Personal Information on our systems for a longer period of time, the reason for this is to allow us to:

- Comply with record retention requirements as prescribed by law;
- Audit our business;
- Understand your consumer journey; and
- Respond to complaints regarding our services.

Jenny Internet is committed to protecting the security of your Personal Information. We employ what we believe is an adequate level of technical and organizational measures to ensure that your Personal Information is kept secure and is protected against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access.

## Data Subject Rights

You may contact us to change, update or access your Personal Information; and to unsubscribe from any promotional communication.

## General

We are not responsible for the privacy practices of or the content on sites linking out of the Jenny Internet network. You agree to exclude Jenny Internet from any liability arising from your access to sites other than those on the Jenny Internet network. Jenny Internet reserves the right to make changes to the Privacy Policy, at any time and without notice. Any change binds you as soon as you access the Website or use our services. We therefore strongly recommend checking this page on a regular basis.

By using this website, you signify your acceptance of our Privacy Policy. If you do not agree to this policy, please do not use our site and related pages. Your continued use of the website following the posting of changes to these terms will mean that you accept those changes.

If you have any questions about the Privacy Policies, please feel free to email your questions to us at [legal@jenny.co.za](mailto:legal@jenny.co.za).