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Reg: 2014/009214/07

A Huge Group Company

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build - connect - manage

1 July 2021

Huge Networks Privacy Policy

This Privacy Policy describes how Huge Networks collects, uses, discloses, retains, and protects your personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws.

The Privacy Policy applies to any website, application, form, document, product, or service which references this Privacy Policy.

POPIA defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person”. This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

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1. How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you when you complete an application form, electronically, telephonically or by way of a hard copy;

We will also collect your information where you have only partially completed and/or abandoned any information which you began to apply to our website and/or other online forms. Given that we already consider you a customer at this stage, we may use this information to contact you to remind you to complete outstanding information.

Where we require personal information to provide you with our products and services, your failure to provide us with the necessary information, will result in Huge Networks being unable to provide you with our services. Where such services include advice on data and network services, the appropriateness of the advice may be compromised if you do not provide complete and accurate information. You are responsible for informing Huge Networks if your information changes.

2. What information we collect

The personal information we may process includes the following:

- Information about you – for example, your name, identity number, copy of your identity card, nationality, proof of residence, cohabitant form (if necessary), copy of your passport and profession.
- Contact information – for example, your email address, physical address, phone number and postal address.
- Financial information – for example, proof of bank account and SARS statement.
- Contractual information – for example, details about the data and network services you hold and with whom you hold them.
- In the case of a child – birth certificate, proof of bank account (guardians), proof of residence (co-habitant form) and an authorised representative's personal information.

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, and it will not affect the processing of your personal information where consent is not required.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

3. How we use your information

For us to provide clients with the data and network services they have requested and to notify them of important changes to such services, we need to collect, use and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.

To the extent permissible under applicable laws, Huge Networks may use your information:

- To provide you with our data and network services, and maintain our relationship with you;
- To provide you with value added services;
- To conclude and administer your subscription;
- To execute a transaction in accordance with your request;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators;
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of Huge Networks policies;
- For purposes of online login and authorisation;
- To perform any risk analysis or for purposes of risk management to you or our business in general;

- To record and/or monitor and have access to your telephone, correspondence and electronic communications to/with us (or any of our employees) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- To maintain the security of our digital channels and systems;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with Huge Networks and to help us improve our offerings to you;
- To provide you with information about our services from time to time via email, telephone or other means;
- To process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- For any purpose related to and compatible with the above.

4. Sharing your information

Huge Networks will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to the following entities:

- Our third-party service providers who are involved in the delivery of network and data services (example our upstream providers);
- Other third parties in relation to the purposes set out under the previous section (How we use your information);
- Other public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention; and
- Huge Networks will not sell, rent, or trade your personal information to any third party. Huge Networks will share information about you with Huge Networks representatives.

Huge Networks will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Independent Communications Authority of South Africa).

Huge Networks will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of the POPIA Act.

5. Transfer across borders

Some of the persons to whom we disclose your personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, we may send your personal information to service providers outside of the RSA for storage or processing on Huge Networks' behalf. However, we will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

6. Security and storage of information

Huge Networks intends to protect the integrity and confidentiality of your personal information. Huge Networks has implemented appropriate technical and organisational information security measures including, but not limited to securely storing your information in line with international best practices to keep your information secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this policy and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

7. Right of access to information

POPIA offers an individual the right to access information held by a public or private body in certain instances.

8. Correction of your information

In accordance with POPIA, you have a right to correct any of your personal information held by Huge Networks.

9. Objection to processing of your information

In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

10. Marketing

Where you provide your personal information to Huge Networks in the context of the sale of our services, you agree to Huge Networks sending you information on news, trends, services and events, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from Huge Networks at any time by contacting sales@hugenetworks.co.za.

11. Children

Huge Networks is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their personal information.

12. Updates

A notice will be communicated by Huge Networks whenever the Privacy policy is materially changed.

13. Complaints/concerns

Should you have a complaint or concern regarding the processing of your personal information, your complaint may be submitted to legalenquiries@hugenetworks.co.za for the attention of Marius Oberholzer who serves as Huge Networks Information Officer as prescribed by the POPI Act.

14. The Information Officer

Below is the name and details of the designated person who has been appointed as our information officer, responsible for ensuring that the requirements of the Act are administered in a fair, objective and unbiased manner for our company. Please address all requests for access to records relating to the company to:

Name: Marius Oberholzer
Street Address: Unit 6, 1 Melrose Boulevard, Melrose Arch, Johannesburg
Postal Address: As above
Office number: 010 786 0000
E-mail address: legalenquiries@hugenetworks.co.za

15. The Information Regulator

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa) JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za