

Privacy Policy

Note: Please review this Privacy Policy carefully.

This Privacy Policy explains our lawful basis for processing your Personal Information and includes information on who we are, what information we may collect from you, how we use or store it, the choices you have regarding our use of it, your ability to review and correct it and how to opt out from any of our services and/or from receiving any promotional material.

The data we may collect may be personal data about you or by which you can be identified e.g. your full name, address (email and/or postal), mobile number/MSISDN (mobile station integrated services digital network number) etc. ("**Personal Information**") as well as other non-personal data for analytical purposes to monitor trends and statistical data, which may include: URL/internet protocol address, mobile device location, browser type, pages of the service accessed, viewed search terms, your online service behaviour e.g. subscriptions, product/service purchases, widget/app downloads, social media sharing, comments, reviews etc.

This Privacy Policy is supplemental to the terms and conditions for our service found at URL: <http://www.hellokittyplayhouse.co.za/platinum/#!/terms/terms> which form an integral part of this Privacy Policy.

Who We Are

Buongiorno South Africa (Pty) Ltd, a private company with limited liability registered in the Republic of South Africa, operating under company number 1990/04637/07, with its registered office at: Auto Atlantic building, 5th Floor, Cnr Heerengracht and Hertzog Boulevard, Cape Town, 8001 (the "**Company**" and/or "**Responsible Party**"). The Company has been authorised to act as licensee of "Sanrio GmbH" in the Republic of South Africa to provide you with a vast amount of mobile content including games and videos for preschool aged children (the "**Content**") for a flat daily, weekly or monthly subscription fee on your supported mobile device accessed via the web app and/or native app (the "**Service**").

In this Privacy Policy references to "**we**", "**us**", "**our**" and any similar expression shall include the Company and any of its affiliates and references to the customer shall include "**you**" or "**your**".

Privacy Commitment

We understand and recognise the importance of safeguarding Personal Information received from our customers and so we have formulated this Privacy Policy to reflect our commitment to maintaining the confidentiality of Personal Information received from you via your selected Service.

In the course of our business we only process Personal Information in relation to our customers in terms of the services requested by them, which will be detailed in the agreement between us ("**lawful purpose**").

We respect your privacy and we will handle your Personal Information in an ethical manner. We will also ensure that we are compliant with the privacy laws in the Republic of South Africa, including, the Protection of Personal Information Act 2013, as amended from time to time ("**POPI**").

We are authorised to collect your personal information, for a lawful purpose, by POPI. In order to access/collect/process your information, we act on your behalf as the Responsible Party requesting access to your information under South African legislation.

Information Collected

Every time you visit the Service, our system automatically recognises the mobile device type used to communicate with us. Individual users will remain anonymous unless you tell us who you are. Generally, you can access the Service without telling us who you are, although we may collect certain data about your visit to the Service to help us improve Service quality. Before you are able to fully access any of the Content, our web application and/or native application (collectively the "**App**") or use the Service you will be required to subscribe to the chosen Service via the App.

We may gather the Personal Information to allow us to process your subscription to your chosen Service, process any requests or payments you may make, administer your contract, provide customer services, process refunds, communicate with you, award prizes and provide marketing or promotional materials (unless you have opted out). We may also collect the Personal Information so that you can access the online Services, monitor your usage of a Service and/or participation in online activities including reviews, testimonials or competitions, if any, or for other purposes outlined in this Agreement.

We retain information in accordance with the required retention periods permitted by applicable law and regulations or for legitimate business purposes. We will only retain your information for the purposes explicitly set out in this Privacy Policy. We may keep information indefinitely in a de-identified format for statistical purposes. This Privacy Policy also applies when we retain your information.

You may at any time withdraw your consent to us collecting Personal Information you provided but this could limit your access to all or part of the Services.

Children and Minors

We do not knowingly collect or solicit Personal Information or other data from children and minors. Anyone under the age of 18 will not be knowingly allowed to register to any of the Services.

If you are under 18, please do not attempt to register to any Service or any part of it or send any Personal Information or other data to us. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us immediately. In the event that we become aware or informed that we have collected Personal Information from anyone under the age of 18 without verification of parental consent, we will promptly delete such Personal Information from our servers.

Disclosures to Third Parties

We will not rent, sell or share your Personal Information with other organisations or non-affiliated companies for commercial purposes unless you have expressly consented to this. However, by law or for regulatory reasons or at the request of an MNO (mobile network operator), we may have to reveal Personal Information to certain third parties if required to investigate or deal with any complaints relating to you or your use of the Service.

Your Personal Information may be revealed to other businesses within our group of companies and/or to reputable third parties who may help process your subscription to the Service or provide customer support services. If all or part of our business is sold, (whether by sale of shares or assets) or integrated with another business, your Personal Information may be disclosed to our professional advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Following completion of any such sale or

transfer your Personal Information shall be disclosed to and transferred to such new owner or third party.

We will not disclose your Personal Information to third parties without first obtaining your consent, save when required by applicable laws and/or regulations or at the request of an MNO (mobile network operator). We confirm that the privacy and data protection practices of our third parties are consistent with ours to ensure maximum protection of your Personal Information. A complete list of the companies responsible for the data processing can be requested directly from the Company.

Your Consent

You agree to us collecting, using and processing your Personal Information or other data you may provide as set out in this Privacy Policy and specifically, by subscribing to the Service, you agree that we may request your mobile phone number/ MSISDN (mobile station integrated services digital network number) from your MNO (mobile network operator) for the purposes of applying the charge(s) to your mobile phone account or providing customer support services relating to the Service.

Transfer of Personal Information outside South Africa

Owing to the global nature of the internet infrastructure and our business, the Personal Information you provide may be transferred outside of the Republic of South Africa ("**RSA**") to a foreign country.

Your Personal Information may be transferred to third parties, located outside of the RSA that have been appointed as data processor's in order to manage the customer care service. If this is the case, we are committed to ensuring that appropriate safeguards are put in place in order to make sure that the level of protection guaranteed by the POPI is not undermined. In particular, such transfer may be carried out on the basis of the standard contractual clauses signed between the Responsible Party and the third party. In any case, you may request further information about the transfer of your Personal Information by contacting the us using details stated in the Customer Information section below. You may also require any evidence of the appropriate safeguards adopted.

By using our Service or by interacting with us in the ways described in this Privacy Policy, you consent to the transfer of your information outside the RSA in the circumstances set out in this Privacy Policy. If you do not want your information to be transferred outside the RSA, you should not use our Service.

Your Rights

1. **Opt-out of Marketing.** You have the right to ask us not to process your Personal Information for marketing purposes. You can exercise the right at any time by contacting us using the details listed in the Contact Information section below or SMS "NO" to 31194 to stop receiving promotional and marketing offers from us.

2. **Cancel the Service:** You are free to cancel your Subscription, at any time, by clicking on to the unsubscribe option and following the instructions via the account section of the App portal. You can also unsubscribe by sending an SMS with the keyword "STOP" to 31194 to unsubscribe from the Service at any time.

3. **Right to Object.** In certain cases, you may on reasonable grounds object to us using your Personal Information by giving us written notice to us. Please see the Contact Information section below. Upon receipt of your notice we shall cease (and cause our third parties to cease) collecting, using or disclosing any Personal Information, as applicable, unless such collection, use or disclosure, as the case may be, without your consent, is required or authorised under POPI or other applicable laws.

4. Right of Access, Correction or Deletion. You can correct factual errors, review and/or update Personal Information held about you at any time by contacting us using the details listed in the Contact Information section below. You may request a copy of the Personal Information we hold about you (please note that any such access request may be subject to a payment of a legally allowable fee). You can also request that we delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete or that you believe was obtained unlawfully (please note requests to delete Personal Information will be subject to any applicable legal and/or document filing, or retention obligations imposed on us).

5. Lodge a Complaint. We aim to work with you on any request, complaint or question you have about your Personal Information. However, if you believe we have not adequately resolved a matter, you may lodge a complaint to the Information Regulator using the details below:

The Information Regulator (South Africa)

Contact: SALU Building, 316 Thabo Sehume Street, PRETORIA, Tel: 012 406 4818, Fax: 086 500 3351, inforeg@justice.gov.za.

Linking to third party sites

If a Service, App and/or any Content contain a link to any websites outside of our control, these websites are not under our control and we are not responsible for those websites or the conduct of companies who own or control those websites. Your use of those other websites is subject to any terms of use and/or privacy policies on those websites.

Cookies

Our Services use 'cookies' to distinguish you from other users of a Service. A cookie is a small amount of data or parcels of text that is sent to your browser from a web server and stored on your mobile device's hard drive, if you consented to this. Generally, a 'cookie' being a file in your web browser enables the website to recognise your mobile device when you visit the website.

Cookies help us to enhance your experience when you access a Service and also allows us to improve it. We may obtain information about your general internet usage by using such cookie files which are stored on the browser of your mobile device type. Cookies contain information that is transferred to your mobile device type.

They enable us to:

- estimate our audience size and usage pattern.
- store information about your preferences, and so allow us to customise our site according to your individual interests.
- speed up your searches.
- recognise you when you return to our site.
- provide a more convenient browsing experience for you.

You may refuse to accept all cookies, reject all cookies, or modify your browser to alert you of any new cookies by activating these settings on your browser. However, if you select any of these settings you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access a Service. Please note that advertisers may also use cookies, over which we have no control.

To reject cookies or alter the access in any way, you can follow the instructions below to do so. Please always check for updated software instruction versions as to how to control cookies.

iPhone

1. Turn on your iPhone
2. Tap on "Settings."
3. Scroll down and select "Safari."
4. Swipe to the bottom and tap on "Clear Cookies."
5. When it asks you to confirm, tap on "Clear Cookies"
6. Delete any saved passwords

Android

1. Turn on your Android
2. Tap on your preferred "Browser."
3. Press the "Menu" button
4. Tap "More" and then "Settings."
5. Select "Privacy Settings" and tap on "Clear All Cookie Data."
6. When it asks you to confirm, click "Yes"

You can also discover independent information about cookies by researching the internet or carrying out online searches.

Security Statement

The security internal procedures are designed to cover the storage, access and disclosure of your Personal Information. We are committed to online security. We maintain security measures to protect your Personal information via the Service and to try to prevent unauthorised access of such data that is transmitted to our databases. We cannot however guarantee the security of any data sent over the internet.

The following provisions and arrangements are in place:

- a) We have a management and corporate commitment to data security within the organisation.
- b) All employees are briefed on the importance of personal data and security and confidentiality of data obtained.
- c) Our security measures are reviewed and updated from time to time.

Changes to Our Privacy Policy

From time to time, it may be necessary for us to review and revise our Privacy Policy. We reserve the right to change our Privacy Policy at any time, and we may notify you about changes to this Privacy Policy by posting an updated version of the policy on our web application <http://www.hellokittyplayhouse.co.za/platinum/#!/terms/privacy>. By continuing to access or use any of the Services after we have posted an updated Privacy Policy or have provided you with notice of any material modifications of the same, you are agreeing to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, your only recourse is to cease using our Services.

Contact Information

If you have any questions concerning this Privacy Policy please contact us via our address, email or by using the helpline stated below:

Address: Hello Kitty PlayHouse, Buongiorno South Africa (Pty) Ltd, Auto Atlantic building, 5th Floor, Cnr Heerengracht and Hertzog Boulevard, Cape Town, 8001

Self-Help: webappsupport.co.za

Helpline

MTN/CellC: 021 415 2166 (standard call charges apply)

Vodacom: 021 415 2136 (standard call charges apply)

Email: hellokitty.za@buongiorno.com

Update: last update October 2018