

## Privacy Policy

Please review this Privacy Policy carefully. This Privacy Policy will inform you about the 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 information 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), date of birth, gender etc. (“**Personal Information**”) as well as other non-personal information for analytical purposes to monitor trends and statistical data: 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.infinityvr.co.za/platinum/#!/terms/terms> which form an integral part of this Privacy Policy.

### Who We Are

**Buongiorno South Africa (Pty) Ltd**, trading as “**InfinityVR**” (the “**Company**” or “**we**” or “**us**” or “**our**”) is a private company with limited liability registered in South Africa under company number 1990/004637/07 whose registered office address 5th Floor Auto Atlantic Building, cnr Heerengracht and Hertzog Boulevard, Cape Town 8001. The Company provides a vast amount of mobile content including the latest lifestyle news, articles and videos that is accessible on your mobile device via the internet through our web application (the “**App**”), [www.infinityvr.co.za](http://www.infinityvr.co.za) (the “**Service**”).

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 and the Protection of Personal Information Act 2013, as amended from time to time (“**POPI**”).

### Privacy Commitment

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

### Information Collected and Used

Generally, you can access our Service without telling us who you are or revealing any of your Personal Information, although we may collect certain data about your visit to the Service to help us improve the Service quality. Before you are able to fully access any of the Content, the web or native apps (collectively “**App**”) or use the Service you will be required to subscribe to the Service via the App.

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

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

Every time you visit the Service our system automatically recognises the mobile device type used to communicate with us (where possible). Individual users will remain anonymous unless you tell us who you are.

### Age Restricted Materials

**If you are under 18 (eighteen), please do not attempt to register for the Service or any part of it or send any Personal Information or other data to us.**

This Service and/or our App is not directed to children. If you become aware that your child has provided us with personal information, please contact us at: [infinity.za@buongiorno.com](mailto:infinity.za@buongiorno.com) The Company does not knowingly collect or solicit Personal Information or other data from persons under the age of 18 (eighteen). Anyone under the age of 18 will not be knowingly allowed to register for the Service.

If we become aware that a child has provided us with Personal Information, we take steps to promptly terminate the child’s account and remove/ delete such Personal Information from our servers.

## Information to Third Parties

We will not provide your Personal Information to any other company or person which is not affiliated to us, unless you have expressly consented to this.

However, by law or for regulatory reasons or at the request of a MNO (mobile network operator), we may have to reveal any 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 to reputable third parties who will help process your subscription to the Service if necessary such as our supply and service agents and data processors.

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 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 do ask our third parties to confirm that their privacy practices are consistent with ours to ensure maximum protection of your privacy.

## Linking to third party sites

If our Service, App and/or 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.

## 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.

## 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 in transit outside South Africa to a foreign country. Personal Information may be stored on servers located outside South Africa in a foreign country whose laws protecting personal information may not be as stringent as the laws in South Africa. By submitting your Personal Information, you consent to us processing your Personal Information in a foreign country whose laws regarding processing of personal information may be less stringent. However, every effort will be made to ensure that your Personal Information is processed only for the purposes set out above, and for no other purposes and we have taken the steps outlined in this Privacy Policy to try to improve the security of your Personal Information.

## Your Right to Opt-Out

- TEXT **"NO"** to **36609** to stop receiving promotional and marketing offers from us.
- TEXT **"STOP"** to **36609** (state network operators applicable) to unsubscribe.

## Updating Your Information

If you wish to correct your Personal Information please use the contact details listed in the Contact Information section below.

## Withdrawal of Consent

You may at any time withdraw your consent to us collecting and processing your Personal Information in accordance with this Privacy Policy by giving us written notice to us, please see the Contact Information section below. Upon receipt of the withdrawal notice we shall cease (and cause our third parties to cease) collecting, using or disclosing any Personal Information as the case may be unless such collection, use or disclosure, as the case may be, without your consent, is required or authorised under the POPI or other written law.

## Cookies

Our Service uses 'cookies' to distinguish you from other users of our 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 our 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 the Service. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access our Service. Please note that our 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 the sensitive data via the Service and to prevent unauthorised access of customer information that is transmitted to our databases. We cannot however guarantee the security of any data sent over the internet. Details of our security policy and measures can be found below.

This Security Statement explains how we store and safeguard the data we collect about you, and procedures that we have in place to safeguard your privacy generally.

We always use industry-standard encryption technologies when transferring and receiving customer data exchanged with our Service. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of data that we have collected from you on our Service. Unfortunately, however, no data transmission over the internet can be guaranteed to be 100% secure.

To prevent unauthorised access, maintain accuracy of our records and data to ensure proper use of data, we have put in place appropriate physical, electronic and managerial procedures to protect, secure and safeguard your Personal Information that we collect or on through our website.

- The following provisions and arrangements are in place:
1. We have a management and corporate commitment to data security within the organisation and provide clear direction, guidance and responsibilities and procedures in this respect.
  2. We have a designated or nominated compliance officer who deals with security of your Personal Information together with relevant compliance with POPI.
  3. All employees are briefed on the importance of personal data and security and confidentiality of data obtained. Employees may attend training programmes and are provided with updates or practical guidance under POPI.
  4. We control physical security in relation to your Personal Information that is contained at our facilities and restrict access to the site, buildings, computer rooms, office desk, technology areas, equipment and other facilities where unauthorised access by people could compromise our security.
  5. All proprietary or confidential information, including your Personal Information, is contained or stored on a computer and any that is contained and stored on manual files are locked up and secure.

6. We may seek to control access to your Personal Information, including existing procedures for authorising and authenticating users as well as software controls for restricting access and techniques for protecting data such as encryption. Encryption is used in connection with our payment facilities for customers, which ensures that any communications between your device and ourselves is unreadable by anyone else.
7. We monitor and log access so as to assist in detection and investigation of security breaches and any attempted breaches where they occur.
8. We maintain a business continuity plan as a contingency plan which identifies our business functions and assets (including your Personal Information) which would need to be maintained in the event of disaster and set out the procedures for protecting and restoring them if necessary.
9. In respect of detection and investigation of breaches where they occur, we have in place relevant controls which should alert us to a breach in security. We endeavour to investigate every notified breach of security.
10. The Personal Information held by us are currently stored on a relevant technology system, mass email programme data base, individual account contact manager's systems together with the training booking spread sheet, invoicing spread sheet, Excel spread sheets, paper form.
11. 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 App <http://www.infinityvr.co.za/platinum/#!/terms/privacy>. By continuing to access or use the Service 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 the Service.

### 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:** Buongiorno South Africa (Pty) 5th Floor Auto Atlantic Building, cnr Heerengracht and Hertzog Boulevard, Cape Town 8001.

**Helpline:** 021-4152166 (local call charge rate)

**Email:** [infinity.za@buongiorno.com](mailto:infinity.za@buongiorno.com)

**To unsubscribe at any time text:**

- SMS "STOP" to 36609

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