

Privacy Policy

35050 ViP

1. INTRODUCTION

- 1.1 We understand and recognise the importance of safeguarding the Personal Information (hereinafter defined) of our customers and so we have formulated this Privacy Policy to reflect our commitment to maintaining the confidentiality of the information received from you via this Service.
- 1.2 This Privacy Policy will inform you of what Personal Information we may collect from you, how we use, process and retain it, the choices you have regarding our use of it, your ability to review and correct it and how to opt out of the Service or from receiving any promotional material.
- 1.3 This Privacy Policy is supplemental to the terms and conditions for the 35050 ViP service found at <http://wap.35050.co.za> and forms and integral part of this Privacy Policy.
- 1.4 The Services are managed by Buongiorno South Africa (Pty) Ltd (registered in South Africa under company number 1990/004637/07 but trading here as 35050 ViP. The terms “we”, “us” and “our” used in this Privacy Policy refers to 35050 ViP.

2. PERSONAL INFORMATION

- 2.1 This could include any information about you or by which you can be identified e.g. your name, address, mobile numbers, photographs, birth date, gender, occupation, personal interests, etc (“**Personal Information**”)
- 2.2 Generally, you can access our Services without telling us who you are or revealing any Personal Information although we may collect certain information about your visit to help us improve the service quality.
- 2.3 When you use the Services, register and/or subscribe to the Services (or as required), you may have to complete a subscription process including a registration form and provide some Personal Information.
- 2.4 We gather the Personal Information to allow us to process your registration, process any requests or payments you may make, administer your contract, process refunds, communicate with you, award prizes and provide marketing or promotional materials.
- 2.5 We also collect the Personal Information in order to grant you access to the online Services, monitor your usage of our Services, and/or participation in online activities including reviews, testimonials or competitions, if any. The information is also collected for such other uses as are expressly set out in this Privacy Policy below.

- 2.6 You can refuse the collection by us of some of the Personal Information or any other information. However, if you decline to provide all information required this could limit your access to some of the Services.
- 2.7 For each visit to our Services, our systems automatically recognize the mobile number and mobile device type used to communicate with us (where possible). For analytical purposes in order to monitor trends and statistical data, we may also track the following:
- URL/internet protocol address
 - Mobile device location
 - Browser type
 - Pages of Services accessed
 - Viewed search terms
 - Your online service behaviour e.g. subscriptions, product/service purchases, widget/app downloads, social media sharing, comments reviews etc. Individual users will remain anonymous, unless you tell us who you are.

3. CHILDREN AND MINORS

- 3.1 We do not knowingly collect or solicit Personal Information from children and minors. Anyone under the age of 18 will not be knowingly allowed to register for the Services. If you are under 18, please do not attempt to register for the Services or send any Personal Information to us.
- 3.2 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 immediately terminate the user's subscription account But the Personal Information may be kept for such a period as set out below in Clause 8 (Retention). Minors under the age of 18 years old should make sure that they ask their parents for permission before sending any information

4. INFORMATION TO THIRD PARTIES

- 4.1 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 we may be required to disclose 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.
- 4.2 Your Personal Information may be disclosed 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 customer service agents and data processors.

- 4.3 If all or part of our business is sold, (whether by sale of shares or assets) or integrated with another business, your details and 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 for the sole purpose of business asset transaction. Following completion of any such sale or transfer of the business, your Personal Information shall be one of the transferred assets and so be disclosed to and transferred to such new owner or third party. “Business asset transaction” means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation.
- 4.4 We do ask our third parties to confirm that their privacy practices are consistent with or no less stringent than ours however we cannot be held liable for any privacy policy that does not meet the same standards as ours

5 YOUR CONSENT

- 5.1 You agree to us collecting, using, processing and retaining your Personal Information as set out in this Privacy Policy.
- 5.2 Owing to the global nature of the Internet infrastructure, the Personal Information you provide may be transferred in transit to countries outside the African Union that may not have similar protections in place regarding your data and its use as set out in this Privacy Policy. However, we have taken the steps outlined above to try to improve the security of your information if passing it to third parties. By submitting your Personal Information you consent to these third party transfers.

6 COOKIES

- 6.1 Our Services uses ‘cookies’ to distinguish you from other users of our Services. 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 consented to that. Generally, such a 'cookie' being a file in your web browser will enable the website to recognise your mobile device when you visit the website.
- 6.2 Cookies help us to enhance your experience when you access our Services and also allow 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.

6.3 Cookies enable us to:

estimate our audience size and usage pattern;
evaluate the Service;
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.

- 6.4 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 Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access our Services. Please note that our affiliates may also use cookies, over which we have no control.
- 6.5 If you wish to reject cookies or alter the access in any way, you can follow the instructions below to do so. Please always check for updated network operator or device software instruction versions as to how to control cookies.

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

7. UPDATING YOUR INFORMATION

- 7.1 If you wish to update or correct your Personal Information, please let us know by:

Email: callcentre@buongiorno.com

8. RETENTION OF PERSONAL INFORMATION

- 8.1 We shall cease to retain your Personal Information, or remove the means by which the Personal Information can be associated with particular individuals, as soon as it is reasonable to assume that retention is no longer necessary for legal or business purposes.

9. WITHDRAWAL OF CONSENT

- 9.1 You may at any time withdraw your consent to us collecting and processing your personal data in accordance with this Privacy Policy by giving written notice. Upon receipt of the withdrawal notice, we will aim to terminate your registration with us with immediate effect and we shall aim to cease (and cause our data intermediaries and agents to cease) collecting, using or disclosing the personal data, as the case may be, as soon as feasibly possible unless such collection, use or disclosure, as the case may be, without your consent, is required or authorised for legal or regulatory purposes.

10. SECURITY STATEMENT

- 10.1 The security internal procedures are designed to cover the storage, access, disclosure and retention of your Personal Information.
- 10.2 We are committed to online security. We maintain security measures to protect the sensitive data via the Service and to prevent unauthorised access of Personal Information that is transmitted to our databases. We cannot however guarantee the security of any data sent over the Internet.
- 10.3 This Security Statement explains how we store and safeguard the information we collect about you, and procedures that we have in place to safeguard your privacy generally.
- 10.4 We always use industry-standard encryption technologies when transferring and receiving Personal Information exchanged with the Services. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of Personal Information that we have collected from you on our Services.
- 10.5 Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure.
- 10.6 To prevent unauthorised access, maintain accuracy of our records and data to ensure proper use of Personal Information, we have put in place appropriate physical, electronic and managerial procedures to protect, secure and safeguard the personal data and information we collect, on or through our website. The following provisions and arrangements are in place:
 - a) we have a management and corporate commitment to information security within the organisation and provide clear direction, guidance and responsibilities and procedures in this respect.
 - b) all employees are briefed on the importance of Personal Information and security and confidentiality of information obtained by them in the course of their work. Employees may attend training programmes and are provided with updates or practical guidance.
 - c) we control physical security in relation to the 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.
 - d) all proprietary or confidential information, including Personal Information, is contained or stored on computer and any that is contained and stored on manual files are locked up and secure.
 - e) we may seek to control access to 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.
 - f) we monitor and log access so as to assist in detection and investigation of security breaches and any attempted security breaches where they occur.

- g) we maintain a business continuity plan as a contingency plan which identifies our business functions and assets (including personal data) which would need to be maintained in the event of disaster and set out the procedures for protecting and restoring them if necessary.
 - e) in respect of detection and investigation of security 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.
- 10.7 The Personal Information held by us is currently stored on a technology system, mass email and mobile number programme data base, individual account contact manager's systems together with the training booking spreadsheet, invoicing spreadsheet, Excel spreadsheets and paper form.
- 10.8 Our security measures are reviewed from time to time and appropriate measure taken to uphold the above.

Any changes to this policy will be posted on this Website.

Privacy Policy: last updated 29 October 2015