


xvi) Mezzanine Privacy Notice

C1 - PUBLIC

Document approval

Version	Change	DPO	Chief Legal Officer	Managing Executive	Date	Approved version (PDF)
v1	Original Deviations from the Privacy Notice template to align with Vodacom requirements.	Ricky Farrer	Lizelle Moolman	n/a	Jan 8, 2025	 0019D8A8DD984E1...

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Privacy Notice

About our privacy policy

Our privacy policy gets updated from time to time. Whenever we make a change, we'll post this on our website and let you know if there is a material change. For more information or any updates on the privacy policy, please visit our Privacy Notice on <https://mezzanineware.com>.

How to use this privacy policy

This privacy policy explains how we collect, use, share and protect your personal information when you use our products and services and our Website.

It is important to note that when you engage with us, you acknowledge that we require your personal information, as defined in the Protection of Personal Information Act ("PoPIA") and other related regulations and need to process such personal information to provide products or services to you for purposes including to confirm, update and enhance our records, to confirm your identity and additional purposes as detailed below and in other supplementary privacy policies and statements linked to specific services that you subscribe to. The provision of your personal information in terms of this policy is mandatory, and you will not be able to continue using our products and services should you object to providing us with such information.

Who are we?

Mezzanine Ware (Pty) Ltd (hereinafter referred to as "Mezzanine").

Our registered office is Technology Head Office is 14 Quantum road, Techno Park, Stellenbosch 7600, Western Cape, South Africa. We are registered in the Republic of South Africa under Registration Number - 2009/009091/07.

How to contact us

Your opinion matters to us - if you have any questions about our privacy policy or your privacy settings, please submit your query to data-protection-officer@mezzanineware.com and our Data Protection Officer will respond to you. If you would like to mail us by post directly, send it to:

The Data Protection Officer

14 Quantum Road

Techno Park

Stellenbosch 7600

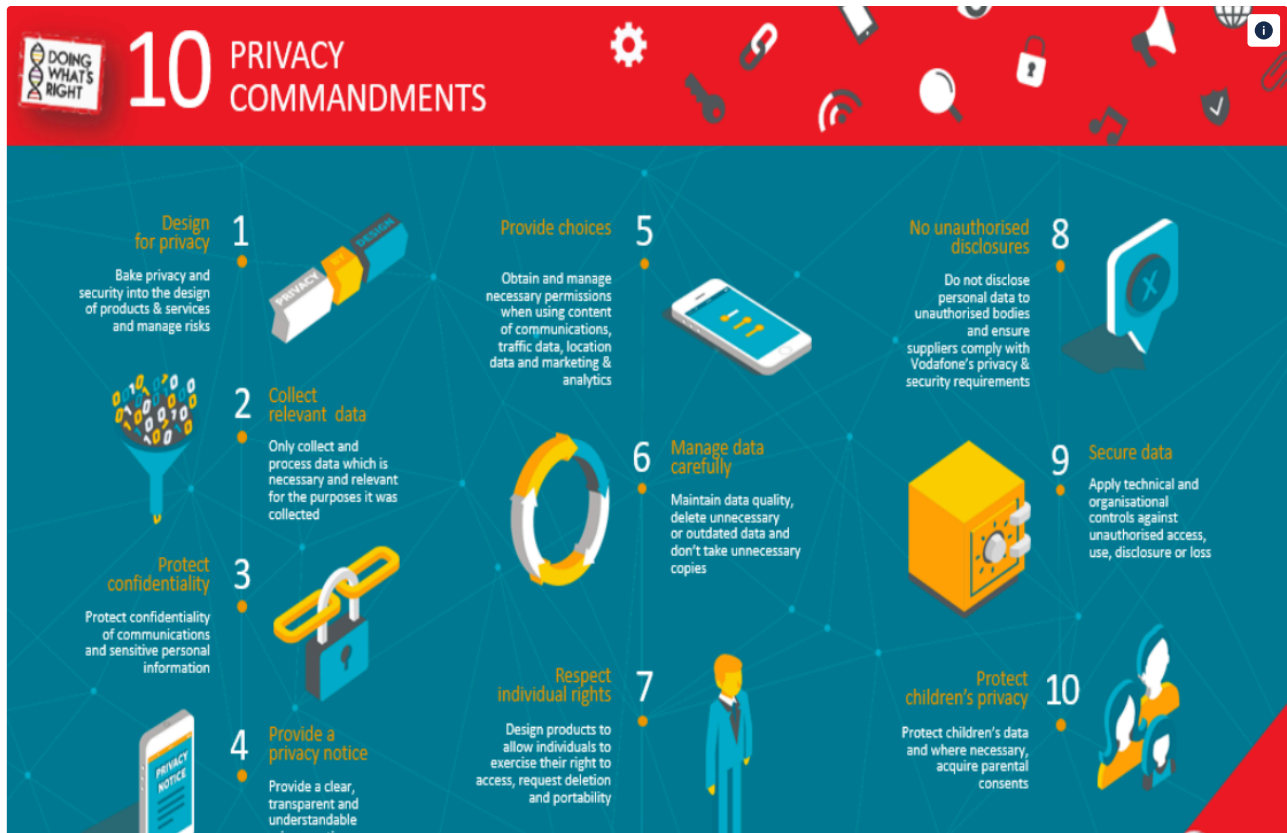
Western Cape

South Africa

Our principles

We are committed to respecting your privacy. We take privacy, security and complying with data protection and privacy laws seriously.

Here are our core Privacy Commitments. We aim to put these commitments at the heart of everything we do.



Personal information we collect about you

Directly from you

The information we collect about you and how we collect it can vary depending on the products and services that you use and subscribe to, how you have used the products and services, how you have interacted with Mezzanine even if you aren't a customer, or what we have obtained from a third party with permission to share it with us..

We will collect your Personal Information when you, for example:

- sign up to any of our products and services;
- Use our network or other Vodacom products and services;
- Subscribe to newsletters, alerts or other services from us;
- Contact us through various channels for support or ask for information about products or services;
- Take part in a competition, prize draw or survey;
- Visit or browse our website or other Vodacom Group websites;
- Have given permission to other companies to share information about you;
- Where your information is publicly available;
- Are the customer of a business that we acquire;
- Visit our business premises; or
- If you are a non-Vodacom customer and contact a Vodacom customer or a Vodacom customer care team.

From third parties

Information collected not directly from you

- Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, and from other data providers. This includes demographic data, interest-based data, and internet browsing behaviour.

We are required to take all reasonably practicable steps to ensure your Personal Information is complete, accurate, not misleading and updated on a regular basis. To ensure this, we will always endeavour to obtain Personal Information from you directly.

How we use your personal information and our lawful basis to do so

We will use your Personal Information for a number of purposes ranging from enabling us to provide you with the products or services you have requested to ensure we are keeping these secure from fraud.

Whenever we use your Personal Information, we do so based on a specific lawful basis under data protection law listed below:

- **The performance of your contract or to enter into the contract** and to take action on your requests.
- **Mezzanine's legitimate business interests** for example, fraud prevention, prevention of tax evasion and financial crime, maintaining the security of our network and services, direct marketing, and the improvement of our services. Whenever we rely on this lawful basis to process your Personal Information, we assess our legitimate interest to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the "Your rights" section of this policy.
- **Protecting your legitimate interests** – for example, providing notifications regarding network availability and performance in your area, notification of emergency services, and fraud prevention. For more information, visit the 'Your rights' section of this policy.
- **Compliance with a mandatory legal obligation**, including for example, where a particular law requires Mezzanine to process Personal Information for a defined purpose.
- **Consent you provide** where Mezzanine does not rely on another legal basis (referred to above). Consent may be withdrawn at any time. When you give your consent, you will be given details on how to change your mind or visit the "Your rights" section of this policy for more information.

Below you can find an overview of the categories of Personal Information (not an exhaustive list) we process about you, the purposes for which we process that Personal Information and the lawful basis upon which we rely to conduct that processing.

How is your information used?	What data is used?	Lawful basis
Processing your order and providing you with your products and services <ul style="list-style-type: none"> • To process the products and services you've bought from us and keep you updated with the progress of your order. 	Basic Personal Information Contact details Account information	Performance of your contract
Customer Care <ul style="list-style-type: none"> · To bill you for using our products and services · To respond to any questions or concerns you may have about our network, products or services. 	Basic Personal Information Account information Financial details	Performance of your contract
Service messages <ul style="list-style-type: none"> · We will contact you with customer service messages to keep you updated with current information about products and services you've purchased. For example, 	Basic Personal Information Contact details Account information	Performance of your contract

changes to our terms and conditions, price plan and service interruptions.		
<p>Improving and innovating our products and services</p> <p>· We anonymise, de-identify or aggregate information in order to improve the service we offer to everyone. None of these analytics are linked back to you in any way.</p>	<p>Anonymised/aggregated:</p> <p>Traffic data</p>	Legitimate interest
<p>Improving and innovating our products and services through third parties</p> <p>· We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services.</p>	Anonymised/aggregated: Account information	Legitimate Interest
<p>Manage our networks and understand network usage</p> <p>· To protect our networks and manage the volumes of calls, texts and other uses of our networks. For example, we identify peak periods of use so we can try and ensure the networks can handle the volume at those times.</p>	<p>Traffic data</p> <p>Location data</p>	Performance of a contract

Under certain circumstances, it is necessary for us to process your Personal Information in order to comply with the law, for example, when responding to law enforcement requests for data or to comply with tax requirements. which are subject to strict internal policies, procedures, and your right to restrict usage of your Personal Information, which control the scope of legal assistance to be provided. We are also required to also process your Personal Information pursuant to legislation including but not limited to the Financial Intelligence Centre Act, 38 of 2001 (FICA), the Regulation of Interception of Communications and Provisions of Communication-related Information Act 70 of 2002 (RICA), the Electronic Communications and Transactions Act, 2002 (ECTA), the Electronic Communications Act, 2005 (ECA), the Consumer Protection Act, 2008 (CPA), the Promotion of Access to Information Act, 2000 (PAIA), and the Cybercrimes Act, 2020.

Third parties that we work with

We are not in the business of selling your data, we only share with suppliers who help us to provide services.

If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, they may have access to your Personal Information. We don't authorise them to use or disclose your Personal Information received from us except in connection with providing their services.

How we share your personal information

Where applicable, we share information about you with:

- Partners, suppliers, or agents involved in delivering the products and services you've ordered or used;

- Companies who are engaged to perform services for, or on behalf of Mezzanine
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement

International data transfers

We may also need to transfer your information to other Vodafone or Vodacom group companies or service providers in countries outside South Africa, in which case we will fully comply with applicable data protection legislation. This may happen if our servers or suppliers and service providers are based outside South Africa. Countries in the United Kingdom and EEA are considered to have adequate data protection laws similar to those of South Africa; however, we will make sure that your information is protected and enter into appropriate agreements to achieve this.

Where we transfer your personal information outside of the borders of South Africa, we will ensure that the third-party recipient is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection for your personal information that is substantially similar to the data protection laws applicable to South Africa.

How long do we keep your personal information for?

We may not retain your Personal Information any longer than is necessary for achieving the purpose for which your Personal Information was collected or subsequently processed, unless:

- The retention of your Personal Information is required or authorised by law;
- We reasonably require your Personal Information for lawful purpose related to our function or activities;
- The retention of your Personal Information is required by a contract that we enter into with you; or

As a general rule, subscriber identity documents and communication records are retained for a period of 5 years after termination of services. However, given other lawful and legitimate business needs the information may be retained longer to fulfil the business or legal requirements.

Keeping your personal information secure

We have specialised security teams who constantly review, improve, and ensure the implementation of appropriate, reasonable technical and organisational measures to protect your Personal Information from unauthorised access, accidental loss, disclosure, or destruction. We are required in terms of POPIA to notify you and the Information Regulator, if any of your Personal Information has been compromised.

We cannot accept responsibility for any unauthorised access or loss of Personal Information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your Personal Information on their site.

The same applies to any third-party websites or content you connect to using our products and services.

Despite the security measures we have in place to protect your Personal Information, (firewalls, password access and encryption methods) you acknowledge that it may be accessed by an unauthorised third party, e.g., as a result of an illegal activity.

In the unlikely event of such access, we will notify you, where possible, via email, SMS or using the address you have provided us with, within a reasonable time of us becoming aware of such occurrence.

Your rights

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please contact our Data Protection Officer at data-protection-officer@mezzanineware.com.

Right to access Personal Information

You have the right to request a record or description of the Personal Information that Mezzanine holds about you. This includes the right to request Mezzanine to confirm, free of charge, whether or not we hold any Personal Information about you; as well as information about the categories of third parties who have, or have had, access to your Personal Information.

To make this request as an individual or an authorised third party, download and complete the prescribed form - [\[InfoReg SA PAIA Form 2 Request for access to PII\]](#) - and email to data-protection-officer@mezzanineware.com

Right to correct Personal Information

You have the right to correct information held about you if it's not accurate, out-of-date, excessive, irrelevant, or misleading.

If the information we hold about you can download and complete the prescribed form - [\[InfoReg SA POPI Form 2 Request for Correction or Deletion of PII\]](#) - and email to data-protection-officer@mezzanineware.com

Right to object to use of Personal Information

You have the right, in certain circumstances, to object to Mezzanine's processing your Personal Information. In order for Mezzanine to provide you with products and services, Mezzanine is required to process your Personal Information and as such the provision of your Personal Information is mandatory and you may not object to same in order to continue using our products or services.

For more information or to exercise this right, please download and complete the prescribed form - [\[InfoReg SA POPI Form 1 Objection to the processing of PII\]](#) - and email to data-protection-officer@mezzanineware.com

Right to restrict use of your Personal Information

If you feel that the Personal Information we hold on you is inaccurate, or you believe we shouldn't be processing your Personal Information, please contact data-protection-officer@mezzanineware.com to discuss your rights. In certain circumstances, for example where you contest the accuracy of your information, or where Mezzanine no longer requires your information for achieving its purpose but must maintain it for purposes of proof, you have the right to ask us to restrict processing.

Right to deletion

Mezzanine strives to only process and retain your Personal Information for as long as we need to. In certain circumstances, for example, where you indicate that your Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, you have the right to request that we erase your Personal Information that we hold. If you feel that we are retaining your Personal Information longer than we need, it is worth first checking that your contract with Mezzanine has been terminated. If your contract with Mezzanine has been terminated, we may still have lawful grounds to process your Personal Information.

How to lodge a complaint

If you want to contact us about any of your rights or should you believe that Mezzanine has used your Personal Information contrary to applicable law, you undertake to first attempt to resolve any concerns with Mezzanine directly. Kindly contact our Data Protection Officer on data-protection-officer@mezzanineware.com. We will do our best to help but if you not satisfied with such process, you have the right to lodge a complaint with the Information Regulator at:

The Information Regulator (South Africa)

JD House

27 Siemens Street

Braamfontein

Johannesburg

2001

Email: infoereg@justice.gov.za

Complaints emails:

- PAIA Complaints - PAIAComplaints@infoeregulator.org.za
- POPIA Complaints - POPIAComplaints@infoeregulator.org.za

Notification of changes to Privacy Policy

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing products and services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. If we do, we will notify you the next time you visit this site or interact with us through any of our other communication channels. We encourage you to check this page regularly.

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