



GROOTfm 90.5 NPC PRIVACY POLICY



INDEX

1. OBJECTIVE OF THIS PRIVACY POLICY
2. APPLICATION OF THIS PRIVACY POLICY
3. CHANGE OF PURPOSE
4. CHILDREN
5. SHARING/ DISCLOSING INFORMATION
6. WARNINGS
7. STORING AND RETENTION OF PERSONAL
INFORMATION
8. DIRECT MARKETING TO YOU
9. SECURITY OF YOUR PERSONAL INFORMATION
10. CHANGES AND UPDATES IN THIS SECURITY
POLICY
11. CONTACT US



1. OBJECTIVE OF THIS PRIVACY POLICY

1.1. Definition

GROOTfm 90.5 NPC (referred to as "The Company", "we", "us", "our") respect and acknowledge the importance of protecting your personal information.

GROOTfm 90.5 NPC is a "responsible person" in terms of the South African Protection of Personal Information Act, 2013 ("POPIA") and a "controller" in terms of the General Data Protection Regulation ("EU GDPR") 2016/679 of the European Union in that it determines the purpose and the manner of processing of personal information.

1.2. Introduction

This policy should be read in conjunction with our PAIA manual and POPIA policy.

GROOTfm 90.5 NPC platforms and services enable users to access and use GROOTfm 90.5 NPC products, services and content using internet/electronic access and a compatible device, personal computer, portable media player and/or other devices with appropriate features, applications and functionality capable of interacting with our service.

By accessing and exploiting the features of GROOTfm 90.5 NPC platforms and services, you are deemed to agree to our privacy policy and consent that we may collect, receive, record, organise, collate, store, update, change retrieve, read process, use and share your personal information in accordance with this policy (individually and collectively constituting processing of information). Should you not agree with this privacy policy please do not continue use of any GROOTfm 90.5 NPC platforms.

This policy relates to how we collect, use, process and store your personal information when you access GROOTfm 90.5 NPC services, websites, platforms, applications and products. **The objective** of this privacy policy is to ensure that processing of your personal information will be lawful, reasonable and relevant to our business activities.



2. APPLICATION OF THIS PRIVACY POLICY

This policy only applies to GROOTfm 90.5 NPC services, our website and platform and not to any **third-party** sites and technology you may use to access our products and services.

2.1. How and when we collect personal information

a. Information provided by you:

We collect information about you as person as provided by you to us when you submit your personal information to us in any format, when you send e-mail communications to us, when you provide your bank/payment details to us, when you interact with our customer service, participate in surveys and promotions or choose to provide reviews, ratings, preferences and account settings. Such information may include your name, surname, age, date of birth, physical address, postal address, e-mail address, telephone numbers, social media account detail, profile pictures, payment methods, bank account detail, debit card/credit card details, loyalty points, vouchers and e-bucks/wallet.

b. Information automatically collected by us:

We may use technology to collect and maintain information about you and your use of GROOTfm 90.5 NPC services and products, your computer and/or other device used to access GROOTfm 90.5 NPC platforms when you browse any GROOTfm 90.5 NPC platform, when you register or subscribe to use GROOTfm 90.5 NPC services and products on our website, when you download the GROOTfm 90.5 NPC application on your access device, when you stream, access or use services and products on the GROOTfm 90.5 NPC website.

We may collect information about your devices e.g. the nature of the access device used to access the GROOTfm 90.5 NPC platform, the unique device identifier and IP address used, hardware/device type, model and settings/configuration, operating system type and version, browser type and version, browser language, system activity, referring sources/URL's, exit pages navigated to when exiting the GROOTfm 90.5 NPC platform and the physical location from which the GROOTfm 90.5 NPC platform is accessed, established by means of technology such as GPS or IP location.

We may also collect log-in information such as your activity and interaction with the platform (dates, times and duration of site access and site use), the history of your search enquiries and page views and



program selection and download, your interaction with our messaging systems (e-mail, SMS and otherwise) and our Customer Service (such as date, time, reason for contacting us, recording and transcripts of conversations and chats and you phone number).

Technology such as cookies, identifiers, web beacons, browser storage and plugins may be used to collect information and recognise you when you access and exit GROOTfm 90.5 NPC platforms to distinguish you from other users, to build a profile of your use and contribute to a personalised and efficient service.

c. Information obtained from third parties:

We also collect personal information from our affiliates and third-party service providers which are used to supplement your user profile on our platforms. These include service providers providing us with updates on your IP address, payment service providers providing us with updates on your payment method information, selected partners who make our services available on their device or with whom we offer co-branded service/joint marketing activities, online and offline data providers of demographic advertising related data and publicly available sources such as government data bases.

d. Information obtained from social networking sites:

We may allow you to log onto the GROOTfm 90.5 NPC platforms by using social media account authentication. We may access and collect personal information from your social media account when and while you log on to your social media account from any GROOTfm 90.5 NPC platform using your username and password. We only receive information from social media accounts and do not give them access to your personal information.

We will only process personal information available on your social media account to the extent that you have decided to share the information publicly (in line with your privacy setting on the relevant social media account), and other information obtainable from the social media account only if and to the extent that you may give permission to do so.

2.2. Personal information may include:

- Your full name and surname
- Your identity/registration number/document and date of birth
- Your e-mail addresses for logins and communications
- Your physical address
- Your postal address



- Your home, work and mobile telephone numbers
- Your VAT number
- Your bank details
- Information required for your payment method
- Debit/credit card information
- Financial information when necessitated by the National Credit Act
- Other personal information necessitated by the FIC Act

In certain circumstances we may be required to collect additional information such as a government identification number in order to comply with billing/tax or other legislation or regulations.

If you are not prepared to share then necessary information with us, you may not be able to enjoy all the features and functionality of GROOTfm 90.5 NPC platforms and services.

2.3. OUR USE OF INFORMATION

We collect personal information for various purposes:

- Personal information is collected to comply with legal requirements such as FICA legislation and is used to protect us, our services and our users.
- Personal information is used to authenticate your identity when accessing GROOTfm 90.5 NPC and to ensure safe and authorised use of our services, to detect, investigate and prevent misuse, fraud and prohibited/illegal activities.
- Personal information is collected to maintain and update our customer data base and to secure accurate, complete and up to date data.
- Personal information is used to provide customer support, technical and other user enquiries.
- Personal information is collected to enable us to communicate news and promotional announcements.
- Personal information is used to conduct consumer surveys and research.
- Personal information is used to enable us to analyze and understand our audience, to determine your geographic location to enable us to maintain and develop our platform and personalise and localise our services to you and ultimately secure a constantly improving consumer experience of our services.
- Personal information is used to compile, use, disclose and trade with non-personal statistical information about users and their access and use of GROOTfm 90.5 NPC platform, browsing habits, click- patterns,



preferences and demographics which we or our advertisers may use to develop, provide and improve the GROOTfm 90.5 NPC platform, our products and services, including advertising to user groups. Information anticipated in this paragraph will be de-identified and will not be traceable back to you. Your identifiable information will not be disclosed without your permission.

- Personal information is generally used for other lawful activities relevant to and reasonably necessary for the conduct of our business and provision of GROOTfm 90.5 NPC platform services.



3. CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we originally collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Information Officer.

If we need to use your personal information for a purpose unrelated to the original purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal information without your knowledge or consent but only where this is required or permitted by law.

4. CHILDREN

Protecting the privacy of children is especially very important. We will not knowingly collect or maintain any information from persons under the legal age of majority without permission to do so.

Any person under the legal age of majority in a particular jurisdiction may only access and utilise GROOTfm 90.5 NPC services with the involvement, supervision and approval of a parent or legal guardian.

5. SHARING/ DISCLOSING INFORMATION

We will not intentionally disclose your personal information other than for purposes and in accordance with this policy or with your permission.

In the conduct of our business, we may share your personal information:

- with our affiliates and subsidiaries, if any, who are similarly bound by this Privacy Policy;
- with Business partners, vendors or contractors to provide requested services or facilitate transactions, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, and providing customer support. It is important to note that any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures and are not permitted to process personal information for any purpose other than the purpose for which they are given access;



- in connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;
- in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process;
- where necessary to comply with legal obligations, judicial proceedings, court orders or government orders;
- where you consent to the sharing of your personal information.
- to enforce compliance with our terms of use;
- to detect, investigate, prevent and otherwise address suspected illegal activities, security/technical issues and contravention of this policy;
- to protect and defend the rights, property and safety of GROOTfm 90.5 NPC, our users/subscribers, our employees, service providers, suppliers, agents, any other third party and the interests of the general public as required or permitted by law.

5.1. Third Parties:

We engage other companies, agents, other service providers, suppliers and our employees to render, personalise and optimise our services (e.g., website hosting, site and product maintenance and development, administration, technical and IT support, processing and collecting payments, marketing and advertising, analyzing and enhancing data, conducting consumer surveys and other support services). These **third parties** may have access to your personal information if and to the extent necessary to process the information and/or for us to provide services to you. They will not be allowed to use or disclose your personal information other than for providing of their services.

From time to time, we may engage in joint promotions and competitions with third parties. We may be required to share your personal information with such third parties to facilitate your participation in and exploitation of the promotions. We wish to point out that these third parties are responsible for their own privacy policies and practices.

Information compiled and profiled for statistical purposes will be freely traded in such a manner that the profiles and data cannot be traced back or linked to a specific user.

In the event of a business transfer whereby a third party will acquire ownership or control of our assets, management, shares, platforms or creates an affiliation between ourselves and such third party, whether by virtue of reorganisation, restructuring, merger, acquisition, sale or



otherwise, your personal information will be shared and/or transferred as part of the business arrangement on condition that the receiving party agrees to uphold your privacy rights in a manner consistent with this privacy policy

Confidentiality, non-disclosure and/or penalty provisions in our contractual relationships with these third parties will serve as deterrents against infringement of your privacy rights contrary to the scope of this policy.

6. WARNINGS:

6.1. Your own publications:

Please be aware that whenever you use GROOTfm 90.5 NPC services and elects to post reviews publicly, third parties will have access to the information you disclose yourself.

6.2. Third party sites and technology:

This policy applies to the website, platform, service, product and applications provided by GROOTfm 90.5 NPC and its successors in title to users who access GROOTfm 90.5 NPC platforms. You may be able to access GROOTfm 90.5 NPC services through third party platforms such as gaming system, Smart TV's, mobile devices, set top boxes and other interconnected devices and technologies. GROOTfm 90.5 NPC is not responsible and has no control over the privacy practices of any third-party site to which there may be a link on GROOTfm 90.5 NPC platforms through which you may navigate to or to which you may log in from GROOTfm 90.5 NPC platforms. Please acquaint yourself with the content of such sites and adjust your privacy settings according to your preferences. If you decide to share personal information from GROOTfm 90.5 NPC platforms (e.g., by e-mail, text or other social media) using any device and social technology or applications thereon, please be aware that the social applications are operated by independent social media networks and that sharing of information via such networks will be subject to and governed by the terms of use and privacy policy of the relevant social media operator.



7. STORING AND RETENTION OF PERSONAL INFORMATION

Your personal information is stored on our servers or secure clouds. We reserve the right to transfer to and store your personal information on servers in a jurisdiction other than where it was collected. Where your personal information is required to be transferred across borders to other countries, we will do so in accordance with this privacy policy, will consider any more stringent provisions of privacy protection laws applicable in such other jurisdictions and will take reasonably adequate steps to ensure that your personal information is protected in the other country.

Your personal information will be retained by us to the extent and for so long as you continue to access any of our platforms and do not request us to destroy retained information; and thereafter for so long as

- we are required by law or code of conduct to do so;
- we are bound by contract to do so;
- we reasonably need it for any lawful purposes related to our business activities; and
- we reasonably need it for evidentiary purposes.

We reserve the right to delete, destroy or de-identify personal information that may become obsolete in our discretion for any reason including by virtue you stopping to access our platforms and your account or activity profile becoming and remaining dormant for a prolonged period.

7.1. UPDATING YOUR PERSONAL INFORMATION

It is in our mutual interest that your personal information is complete, accurate and up to date. It is also required by law that we update your personal information on our data bases from time to time. You are kindly requested to regularly verify the accuracy of your personal information and advise us of any changes or discrepancies by either contacting our contact desk and/or by amending your personal profile online on our website to the extent allowed for in the functionality of our web design. We reserve the right to verify the accuracy of your personal information and to restrict the processing of contested or suspect information for a reasonable period while we verify the accuracy.



8. DIRECT MARKETING TO YOU

When you access GROOTfm 90.5 NPC platforms as user you will receive marketing communications from us. You may opt out of receiving direct marketing communications from us at any time by notifying us accordingly. Some devices or applications you use may allow you to refuse to accept or block approach of direct marketing communications. To opt out of receiving push notification messages on your mobile device use your mobile device settings to turn off the functionality. When you avail yourself of these options you do so at your volition and your sole risk of loss of essential communications relevant to your access or use of the platforms and services.

Cookies, identifiers, web beacons, browser storage, plugins and similar technology may be used to automatically collect information about you and your use of our services. These technologies are similar in nature, often operate on interactive basis and have a variety of purposes. Amongst others it is used to recognise and authenticate you when you access the platform. Cookies have performance and functionality functions to enhance your experience of our services. (Cookies are small data files which are transferred to your access device when you visit the GROOTfm 90.5 NPC platform through your browser. It is stored in your web browser and will recognise you when you revisit the platform again. It stores a variety of information and user preferences. Advertising identifiers are like cookies and are found in many mobile devices, tablets and streaming media devices). Data compiled of your viewing habits, program selection and preferences are aimed at making recommendations and providing interest-based advertising on available programs when you log in. You may disable cookies and other similar technologies by configuring your browser to refuse same or by following the prompts on the help function, but by doing so you may not be able to enjoy all the features and full functionality of GROOTfm 90.5 NPC platforms and services.



9. SECURITY OF YOUR PERSONAL INFORMATION

We take administrative, physical, technical and managerial precautions and we use accepted technology reasonably appropriate for managing the risks of processing your information to ensure the integrity of personal information and to safeguard information against loss, theft, alteration and unauthorised access, use and disclosure thereof. While we make the integrity of your personal information a priority, we cannot guarantee that your personal information will be 100% secure.

9.1. What are your rights?

If you wish to complain about how we have handled your Personal Information, please contact our Information Officer at info@grootfm.co.za. Our Information Officer will then investigate your complaint and work with you to resolve the matter.

If you still feel that your Personal Information has not been handled appropriately according to the law, you can contact www.justice.gov.za/infoereg and file a complaint with them.

In order to access, correct, update, block or delete your personal information, you have the right to:

- ***Request access to your personal information:***
This allows you to receive a copy of your personal information held by us and to check that we are lawfully processing it.
- ***Request correction of your personal information held by us:***
This allows you to have any of your incomplete or inaccurate information corrected, although we may need to verify the accuracy of the new information that you provide.
- ***Request erasure of your personal information:***
This allows you to request that we delete or remove your personal information where there is no justifiable reason for us to continue processing the information. In addition, you have the right to request us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information in order to comply with a legal requirement. Please note that for specific legal reasons which will be communicated to you, we may not always be able to comply with your request of erasure.



- ***Object to processing of your personal information:***
You may object to our processing of your information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.
- ***Request restriction of processing of your personal information:***
This allows you to request that we suspend the processing of your personal information in the following scenarios:
 1. If you want us to establish the accuracy of the information.
 2. Where our use of the information is unlawful, but you do not want us to erase it.
 3. Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.
 4. You have objected to our use of your information, but we need to establish whether we have overriding legitimate grounds to use it.
- ***Request the transfer of your personal information to you or to a third party:***
We will provide you, or a nominated third party, with your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.
- ***Withdraw consent at any time where we are relying on consent to process your personal information.***
However, this will not affect the lawfulness of any processing carried out before the withdrawal of your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- ***No fee usually required:***
You will normally not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded,



repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

- ***What we may need from you:*** We may need to request specific information from you to assist us to confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response.
- ***Time limit to respond:*** We will endeavour to respond to all legitimate requests within 30 days. Occasionally it may take us longer than this if your request is particularly complex or if you have made several requests, in which case, we will notify you of the delay and keep you updated.

10. CHANGES AND UPDATES IN THIS SECURITY POLICY

Kindly note that GROOTfm 90.5 NPC reserves the right to change and update this policy from time to time to accommodate changing legal regulatory and operational requirements. Notice of change or update and when it will take effect will be given in accordance with prevailing law. Further use and access of GROOTfm 90.5 NPC services after notification of such changes will constitute your acceptance of the amended terms of the policy. If you do not acknowledge or accept amendments to the policy, you must cancel your use of GROOTfm 90.5 NPC services.

11. CONTACT US

For enquiries about this privacy policy, our use of your personal information and any technology employed for protection of your privacy, please contact our Information Officers (**Johann Louw or Roelien Potgieter**) at info@grootfm.co.za. When you contact us, we may however need to authenticate your identity for your safety and ours before fulfilling your request.