

# Privacy Policy

*Effective Date: October 25, 2023*

This Privacy Policy ("Policy") outlines the privacy practices of Omnea Pay, an entity within Omnea (Pty) Ltd, a South African company registered under number 2019/478958/07 (referred to as the "Service Provider," "we," or "us"). We are dedicated to safeguarding the privacy of all visitors ("Visitors") to our website, [instaPay.co.za](https://instaPay.co.za) (the "Website"), and mobile application (the "App"), as well as all individuals and merchants ("Users") who have subscribed to any of the services we offer ("Services").

If you have any questions or concerns about our privacy policy or practices, please contact us via telephone at 012 470 4900 or email at [support@chips.co.za](mailto:support@chips.co.za). By using our Website, downloading our App, or subscribing to any of our Services, you agree to accept all the provisions outlined in this Policy. If you do not agree with any part of this Policy, please refrain from using our Website, App, or Services.

You must be at least 18 years old or possess the legal capacity to enter into binding contracts to access the Website, App, or use the Services. We do not intend to collect or process any personal information from individuals under 18 years of age.

By accepting this Policy, you acknowledge that you have read and agreed to all its provisions.

## 1. Changes to Privacy Policy

We reserve the right to amend this Policy at any time by posting a revised version on our Website and App. The revised version will take effect for Visitors immediately upon posting. However, Users will be given prior notice of any such revisions through the "Policy Updates" page on the Website or by requiring Users to accept the new terms within the App. If a User is not satisfied with the changes, they may terminate the subscribed Services.

## 2. General Information about Everyone

### 2.1 Types of Information We Collect

As a Visitor or User, you consent to the electronic collection, storage, and use of the following categories of information for the purposes specified in section 2.3 below:

**2.1.1 Usage Details:** This category includes internet usage information, such as your Internet Protocol address ("IP Address"), browsing habits, click patterns, unique user ID, software version, system type, screen resolutions, color capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, content and pages you access on the Website or App, dates and times of your visits, paths taken, and time spent on sites and pages within the Website or App.

**2.1.2 Required Details:** Information needed for the registration of our Services.

**2.1.3 Optional Details:** Additional information voluntarily provided, such as demographic details or information related to your favourite social networking site, participation in competitions, promotions, surveys, and other additional services.

## **2.2 How We Collect Such Information**

**2.2.1 Voluntarily Provided by You:** Required and Optional Details can be submitted by you when using our services, downloading/uploading content, participating in competitions, taking advantage of promotions, responding to surveys, registering, subscribing to additional services, or using optional features and functionality of the Website or App. Please note that the provision of Required Details is essential for us to provide services to you.

### **2.2.2 Automatically Gathered via Various Technologies:**

**2.2.2.1 "Cookies" Information:** When you access the Website or App, we may send cookies to your device to collect certain Usage Details. These cookies may be session cookies (disappear after closing your browser) or persistent cookies (remain after closing your browser but can be removed manually).

**2.2.2.2 Other Tracking Technology:** We may automatically collect Usage Details through various tracking technologies when you access the Website or App or open HTML emails or message links.

**2.2.2.3 Web Beacons:** Our Website may contain web beacons that count page views and access cookies, helping us compile anonymous information about Website and Service usage. These web beacons do not collect personally identifiable information.

## **2.3 The Purpose for Which We Collect This Information**

**2.3.1** We use Required Details to provide the services, verify identity, comply with legal obligations, share with service providers and licensors to administer accounts, provide customer support, and enforce legal rights.

**2.3.2** We may use Optional Details for purposes as indicated at the time of your agreement to provide such information.

**2.3.3** Usage Details are used to provide the latest App version, remember your information for convenient access, monitor Website usage metrics, and track your participation in promotions and activities.

Please note that some third-party business partners may use their own cookies or widgets on our Website, which are governed by their respective privacy policies.

### **3. Information About Users**

#### **3.1 Types of Information We Collect About Users**

If you are a User, we may electronically collect, store, and use the following information:

**3.1.1 Personal Details:** Name, surname, identity number, student number, language, and gender.

**3.1.2 Contact Details:** Mobile number and email address.

#### **3.2 How We Collect Information About Users**

Personal and Contact Details are provided directly to us during User registration or through subsequent updates to your User Account.

#### **3.3 The Purposes for Which We Collect User Information**

We use User-provided information to operate, enhance, and provide features of the Services. Specifically:

**3.3.1** Personal Details are used to identify Users, manage User Accounts, and administer service usage.

**3.3.2** Contact Details are used to verify identity, send service-related notifications, inform Users about updates or content, address copyright infringement, and provide information about competitions, promotions, and special offers.

### **4. How We Protect & Store Personal Information**

**4.1** Personal information of Users and Visitors is stored and processed on cloud-based servers protected by firewalls and data encryption, such as AWS (Amazon Web Services) and Azure. The App does not store data on mobile devices and communicates with cloud servers through Secure Socket Layers (SSL). Access to personal information is authorized only for employees with job responsibilities requiring access.

**4.2** Do not disclose your account password to anyone, and be cautious of unsolicited requests for your password or PIN. You are responsible for maintaining the confidentiality of your unique password, account information, and linked bank account information.

**4.3** If you are a legal entity and not an individual, we will liaise only with your named contact or alternative contact provided by your named contact.

## **5. How We Share Personal Information With Others**

**5.1** We may share personal information with:

**5.1.1** Other companies within our corporate group to provide joint content and services, detect illegal acts, and guide product decisions. These companies use information only for marketing communications if you request their services.

**5.1.2** Service providers under contract for business operations (e.g., fraud prevention, marketing, technology services) who use information for services provided to us.

**5.1.3** Universities, retailers, service providers, and financial institutions with whom we partner to create and offer products and services. These organizations may use information to market Omnea Pay-related products with your consent.

**5.1.4** Companies we plan to merge with or be acquired by. In such cases, the new entity will be required to adhere to this Policy regarding your personal information, and you will receive prior notice.

**5.1.5** Law enforcement, government officials, fraud detection agencies, or other third parties when compelled by a subpoena, court order, legal procedure, or to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or investigate violations of our User Agreement.

**5.1.6** Other third parties with your consent or direction.

**5.2** We do not sell or rent your personal information to third parties for marketing purposes and share your personal information with third parties only as described in this Policy.

## **6. Your Rights**

**6.1** Keep your personal information up to date by informing us of any changes.

**6.2** Review and edit your personal information at any time by signing into your Account and accessing the My Profile menu in the Application pages.

**6.3** Request access to your personal information and obtain a description of the information we hold about you, including third parties who have had access to it.

**6.4** Request the correction of inaccurate personal information.

**6.5** Restrict the processing of personal information in certain circumstances.

**6.6** Object to automated decision making, including profiling, if it has a legal effect on you.

**6.7** Request the deletion or erasure of personal information under certain circumstances.

**6.7.1** Deactivate your account at any time, but please note that some information may remain viewable to others as described in the Policy.

**6.7.2** Retention of certain information for legal purposes.

**6.7.3** Withdraw your consent subject to certain conditions.

**6.8** Raise complaints related to personal information protection issues with the Information Officer at [infoleg@justice.gov.za](mailto:infoleg@justice.gov.za).

**6.9** If you wish to exercise any of these rights, please submit a request. Some rights may be limited in certain situations, as required by law.

## **7. Non-Personal Information**

The following information is not considered personal information for the purposes of this Policy:

**7.1** Permanently de-identified information that cannot be traced back to you.

**7.2** Non-personal statistical information collected and owned by us.

**7.3** Information you provide voluntarily in open, public environments or forums, as it is no longer confidential and not subject to protection under this Policy.

## **8. Your Consent to the Processing of Your Personal Information**

By accepting this Policy, you consent to the collection, storage, processing, and disclosure of your personal information as described in this Policy for as long as you are a registered User of our Services. Upon termination of your registration and Account closure, we retain your information only for record-keeping purposes in accordance with applicable law.

## **9. Changes to the Privacy Statement**

This Policy may change over time, and the latest version is available on our Website. We will notify you of any changes to this Policy by publishing them on our Website, and you can save or print the Policy for your records.

## **10. How You Can Contact Us About Privacy-Related Questions**

For questions or concerns regarding this Policy, to exercise your rights, or if you are aware that a minor under the age of 18 has provided personal information, contact us at [support@chips.co.za](mailto:support@chips.co.za).