

PRIVACY POLICY

Last updated: 1 June 2018

1. What does this Privacy Policy do?

This "**Privacy Policy**" contractually regulates how we collect and use certain of your information and your rights in this regard. Please read this Privacy Policy carefully before entering the Allan Gray Entrepreneurship Challenge ("**the Challenge**") on our "**Website**" (<http://entrepreneurshipchallenge.co.za/>) or using our Website. This Privacy Policy will apply to you, and creates a legally binding contract between us ("us" being the trustees for the time being of the Allan Gray Orbis Foundation and "you" being the browser / user of our Website), whenever you use or access our Website.

2. When does this Privacy Policy apply?

You agree that this Privacy Policy applies when you access or use our Website.

3. Other applicable terms

There are also "**Browser Terms**" on our Website that apply when you use the Website for any reason and additional terms that will apply specifically to the Challenge ("**the Challenge Terms**"). If there is a conflict between these Terms and the Challenge Terms or Browser Terms, the various terms will apply in the following order of precedence: (i) Challenge Terms; (ii) Privacy Policy and (iii) Browser Terms.

4. Changes to this Privacy Policy

Unless notice is required in terms of the law, we may change the terms of this Privacy Policy from time to time in line with any changes that the law or our internal business operations require, without prior notice. The version of this Privacy Policy that is displayed on the Website at the time you visit and / or use our Website will apply to and regulate our relationship. It is your responsibility to consider the Privacy Policy each time you use our Website. **If you do not agree with any terms of this Privacy Policy, you must stop using our Website.**

5. Our commitment

This Privacy Policy and your right to privacy is important to us. We are committed to taking steps to protect your privacy when you use our Website. We implement

business practices that comply with all relevant legislation, including the Protection of Personal Information Act, 4 of 2013 ("**POPI**"), and take special precaution in respects of the protection of children's personal information. In this Privacy Policy, we explain how we will use and protect your personal information.

6. What is personal information?

If we refer to "personal information" or "information" in this Privacy Policy, we mean personal information as defined in POPI. It includes, for example, your full name, surname, email address, identity number, contact details, location, the name of your school and other data or information which you may upload to the Website. If you are under the age of 18 (eighteen), your personal information will qualify as "children's personal information" for purposes of POPI, and requires further protection.

7. Collecting your personal information

We collect personal information about you when you use our Website, communicate with us and/or submit or upload information or data to the Website. We may also collect information about you from third parties

8. Use of Cookies

When you use our Website, we may automatically receive and record information on our server logs from your browser which may include your location, IP address, cookie information, and the page you requested. This is statistical data about browsing actions and patterns and does not identify any individual. We may also obtain information about your general internet usage through a cookie file which is stored on the hard drive of your computer. Cookies enable us to improve our service to you, estimate our audience size and usage patterns, store information about your preferences and recognise you when you return to our Website.

In some instances, we may collect and store information about your location. We convert your IP address or mobile GPS data into a rough geo-location. We may use location information to improve our business and the Challenge and its related activities for you.

You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy the full use of our Website and you may not be able to take advantage of certain additional activities or promotions we may run relating either to the Challenge or to offerings from our partners / sponsors.

Please note that third parties who advertise on our Website may also use cookies, but we do not have access to, or control over them, and therefore cannot take responsibility for them. However, you can also disable these cookies in your web browser settings.

9. Links on our Website

Our Website may include links to other apps or third party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these links. You use these links at your own risk and we will not be liable for any harm that you may incur when using these links.

10. How we use your information

We use your information to make our Website and the Challenge available to you and generally for purposes of our relationship. We will process your personal information for the purposes set out in this Privacy Policy and for any other legally justifiable purpose, such as for purposes of complying with the law or for our legitimate business interests. We will not process any children's personal information in such a way so as to adversely affect the individual privacy of that child to a disproportionate extent.

11. Information that we store and use

We generally store and use the following information: your first name(s), surname, address, phone numbers, email address, details of your school, IP address or cookie information, location information, demographic information including your age and gender, your submissions as a part of the Challenge and any other information which we reasonably need to perform our obligations in terms of facilitating the Challenge.

12. Purposes for processing information

We will only process adequate and relevant information to:

- Facilitate the running of the Challenge and/or to distribute prizes;
- Operate, manage and process your user account for the purposes of your participation in the Challenge;
- Contact you by email, sms, or other means to inform you of any prizes which you may have won or any other Challenge related information;

- Contact you about our related products, services, and/or opportunities that may be available to you (you can always opt-out from marketing communications);
- Enable our partners / sponsors to contact you about related products, services and/or opportunities;
- Monitor and analyse use of the Website or the Challenge and its related goals and performance indicators;
- Form a view about you as an individual and to identify, develop or improve products that may interest you;
- Carry out market research, business and statistical analysis;
- Carry out audits;
- Perform other administrative and operational tasks like testing our processes and systems;
- Comply with our regulatory or other obligations, especially relating to the processing of any children's personal information as required in terms of section 35 of POPI.

We may use your information for other purposes if the law allows for it, or if you consent to it, or if it is in the public interest. Further, any processing of children's personal information will only be done upon receiving consent to do so or in terms of any other legal justification to do so.

13. Right to object

You may, on reasonable grounds, object to us using your information. If you object, we will stop using your information, except if the law allows its use. If you object to us using your information, please take note of the fact that this may affect the functioning and management of the Challenge and its related activities in relation to you.

14. Sharing of personal information

We will keep your personal information confidential and only share it with others in terms of this Privacy Policy, if you consent to it, or if the law requires from us to share it. We have trusted relationships with carefully selected third parties who perform services for us. All these service providers, partners / sponsors have a contract with

us in terms whereof they have a legal obligation to secure your personal information and to use it only in a way that we permit, especially having regard to the nature of the information being children's personal information.

In general, we may share your information with our affiliates, partners / sponsors, third party service providers, regulatory and governmental authorities (if they request us to do so), and any other third party if the law requires from us to share it.

15. How secure is your information?

We are committed to implementing appropriate technical and other security measures to protect the integrity and confidentiality of your information. We protect and manage information that we hold about you by using electronic and computer safeguards like firewalls, data encryption, and physical and electronic access control to our buildings.

We only authorise access to information to those employees who require it to fulfil their designated responsibilities and such information will not be processed in any way so as to adversely affect your privacy.

16. Quality and access to your information

We want to ensure that your information is accurate and up to date. You may ask us to correct or remove any information that you think is inaccurate, by sending us an email to info@entrepreneurshipchallenge.co.za.

You have the right to request us to provide you with information that we hold about you. You must contact us directly to do so or send an email to info@entrepreneurshipchallenge.co.za.

17. Retention of information

We retain information in accordance with the required retention periods in law, for the purposes of processing your information in terms of this Privacy Policy or the Challenge Terms, or for legitimate business purposes.

We may keep information indefinitely in a de-identified format for research and statistical purposes or for the benefit of our partners / sponsors. Personal information that is de-identified cannot be used to identify you and is no longer considered to be personal information in terms of POPI.

This Privacy Policy also applies when we retain your information, even if our relationship has ended.

18. Trans-border flow of information

We may transfer your information to foreign countries for retention purposes or if our service providers are cross border or use systems cross border. If you continue to use our Website, you expressly agree that we may transfer the information cross border for these purposes. We will only share information cross border to recipients who have laws similar to POPI that apply to them, or who have entered into an agreement with us to include the relevant POPI principles in their processing of the information.

19. Security breach

We will report any security breach to the Information Regulator and to the individuals or companies involved. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your information, kindly notify us by sending an email to info@entrepreneurshipchallenge.co.za.

20. Lodging a complaint

If you believe we are using your information unlawfully, please first contact us to try and resolve your concerns. However, you may lodge a complaint with the Information Regulator with the following contact details:

- Website: <http://www.justice.gov.za/infoereg/index.html>
- Address: SALU Building, 316 Thabo Sehume Street, Pretoria
- Contact number: 012 406 4818
- Fax number: 086 500 3351
- Email: infoereg@justice.gov.za

21. Legal disclosure

- Site owner: The trustees for the time being of the Allan Gray Orbis Foundation Trust ("**the Foundation**")

- Legal status: The Foundation is a trust, founded and duly registered in terms of the applicable laws of South Africa
- Trustees: Dr. Zanele Bridgette Gasa, Professor Njabulo S Ndebele and Ayanda Nogantshi
- Description of the main purpose of the Orbis Foundation: Providing non-profit educational and entrepreneurial youth development programs
- Email address: info@allangrayorbis.org
- Website address: <http://www.allangrayorbis.org>
- Physical address: 46 Hof Street, Oranjezicht, Cape Town, 8001
- Postal address: PO Box 21509, Kloof Street, Cape Town, 8008