

**Please pay special attention to the clauses in bold as they may (a) limit the liability of the Foundation or a third party; (b) create risk or liability for You; (c) require You to release the Foundation or a third party from liability; (d) require You to acknowledge a fact**

## PRIVACY POLICY

Last updated: July 2022

### 1. Definitions

The definitions used in the Terms and Conditions apply to this Privacy Policy. However, for the purposes of this Privacy Policy, "We", "Us", "Our", and "The Foundation " also includes the other members of the Allan & Gill Gray Philanthropy Group, such as E<sup>2</sup> Investments (Pty) Ltd, Allan Gray Orbis Endowment and Allan Gray Proprietary Limited.

### 2. Purpose

This "**Privacy Policy**" sets out how We collect and use Your Personal Information. By using the Platform and where applicable, participating in the Challenge You consent to Our collection, storage, processing and disclosure of Your Personal Information on the basis and for the purposes set out in this Privacy Policy.

### 3. Acceptance and changes to this Privacy Policy

By using the Platform and where applicable, registering to participate in the Challenge, You agree to the terms of the Privacy Policy as set out herein ("**Privacy Policy**"). We may modify the Privacy Policy ("**Amended Policy**"). The Amended Policy will be made available via the Platform. Each time You use the Platform You agree to be bound by this Policy and any amendments to the Policy from time to time.

### 4. What is personal information?

In this Privacy Policy, "**Personal Information**" means any information that South African law regards as "Personal Information" and includes any information which identifies You

such as Your full name, surname, email address, identity number, contact details, location, or the name of your school or organisation.

## 5. Collecting your personal information

5.1. In Your use of the Platform and participation in the Challenge, We may collect and store Your Personal Information including:

5.1.1. in respect of individuals, name, surname, address (including Province), email address and other contact information, School and Grade, ID number, date of birth and, gender and in respect of Schools, name and contact details;

5.1.2. photographs and videos of You and Your activities as part of the Challenge;

5.1.3. correspondence via email;

5.1.4. information relating to activity via the Platform; and

5.1.5. website connection information, statistics on page views, traffic to and from the Platform, IP address and standard web log information.

## 6. Use of cookies

6.1. When you use the Platform, 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 the Platform.

6.2. 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, Gaming Network and the Challenge and its related activities for you.

6.3. 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 the Platform or Gaming Network 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.

- 6.4. Please note that third parties who advertise on the Platform 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.

## 7. How We use your information

- 7.1. **At the outset We would like to give You the comfort that You will always own Your Personal Information and that We do not sell Your Personal Information to anyone, for any reason, at any time.**

- 7.2. **We use, disclose and share Your Personal Information as follows:**

- 7.2.1. **to identify you, including to confirm and authenticate Your identity and any other information You submit to Us;**
- 7.2.2. **to administer and manage the Platform and the Challenge;**
- 7.2.3. **to understand how people use the features and functions of the Platform to improve the user experience;**
- 7.2.4. **to invite You to attend events, functions and to participate in forums;**
- 7.2.5. **photographs and videos of You and Your activities pursuant to the Challenge will be used for marketing purposes, including being included in internal and external publications, and the Platform;**
- 7.2.6. **to facilitate the running of the Challenge including to distribute prizes;**
- 7.2.7. **to contact You to inform you of any prizes which you may have won or any other Challenge related information;**
- 7.2.8. **to show results (including question and assignment points, and certificates of completion) on a public leader board, other public media, or email distribution lists;**
- 7.2.9. **to carry out market research, business and statistical analysis;**
- 7.2.10. **to perform administrative and operational tasks necessary to the operation of the Foundation, the Platform and the Challenge;**

**7.2.11. to comply with our regulatory and other legal obligations, especially relating to the processing of any children's personal information;**

**7.2.12. by disclosing Your Personal Information to third party service providers appointed by Us to enable Us to provide the Platform and enable the provision of the Challenge;**

**7.2.13. to Our sponsors, donors, trustees, affiliates and partners (including their employees and/or third-party service providers) for them to obtain information about You and interact directly with you for purposes including sending You marketing material (unless you have opted out from receiving marketing material from them and You can always opt-out from marketing communications);**

**7.2.14. to assess and improve the strategic objectives of the Foundation which includes for operational, marketing, audit, legal and record-keeping;**

**7.2.15. to our service providers who assist with the running of the Foundation (such as fraud prevention, marketing, technology services); and**

**7.2.16. to law enforcement, other government officials, or other third parties as We, in Our sole discretion, believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose Us to legal liability, or in connection with a merger, consolidation, or sale of Our assets.**

**7.3. Certain information, including your name, school, province and grade will be shared by default to enable your participation in the Gaming Network, the Challenge Platform and the Challenge. If you do not consent to this information being publicly shared then you must not register for the Gaming Network, the Challenge Platform, or the Challenge. Other information, such as your birthday or contact details, may be shared at your election.**

**8. How secure is your information?**

**8.1. We take reasonable technical, administrative and physical steps to protect against unauthorised access to and disclosure of Personal Information. We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of Your online session and to protect Our systems from unauthorised access.**

8.2. Our databases are protected from general personnel access both physically and logically. We encrypt Your password so that Your password cannot be recovered, even by Us. All backup drives and tapes are also encrypted.

9. Opt out

You may opt out of disclosure of Your Personal Information to a third party or use of Your Personal Information for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by You by emailing Us at [info@entrepreneurshipchallenge.co.za](mailto:info@entrepreneurshipchallenge.co.za).

10. Access to, correction and deletion of Personal Information

10.1. You may request confirmation as to whether We hold any of Your Personal Information. If we are going to charge You a fee to provide such record, we will provide You with an estimate of the fee beforehand.

10.2. We can refuse to disclose Personal Information on any of the grounds set out in Chapter 4 of Part 3 of the Promotion of Access to Information Act No. 2 of 2000 (“**PAIA**”) such as to protect (a) the privacy of natural and juristic persons; (b) certain confidential information of third parties (c) the safety of individuals, and to protect property; (d) records subject to legal privilege; (e) commercial information of private and natural persons; (f) research information of third parties and the Foundation; and (g) health or other records.

10.3. You may also request Us to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete Your Personal Information that We may no longer retain in terms of the Protection of Personal Information Act of 2013.

10.4. You may also request us to remove Your Personal Information from the Platform or the Challenge, which we may do by suspending or deleting your account.

10.5. When We receive Your request, we will correct or destroy the information, unless We have credible evidence in support of the information in which case We can retain it.

- 10.6. If we cannot reach agreement on whether or not to correct or delete the information and if you so Request, We will indicate on the information that a correction was requested but was not made.
- 10.7. If We change the information and this has an impact on decisions about you, if reasonably practicable, We will inform all persons to whom the Personal Information has been disclosed of those steps.
- 10.8. We will notify you of the action taken by Us because of Your request.
- 10.9. All requests can be made via email at **info@entrepreneurshipchallenge.co.za**. We will always require that you verify you are in fact the owner of such Personal Information. We may take up to 10 business days to attend to Your request.
- 10.10. The Allan Gray Entrepreneurship Challenge forms part of an entrepreneurial journey that experience with Us. The personal information that we hold should be viewed in this light, as our retention of this information is crucial for us to be able to assist You. We will keep your Personal Information for as long as we are obliged and entitled to under South African law. Such information will always be maintained under the same security and privacy controls that are in place for other users of the Platform.

## 11. Trans-border flow of information

We may transfer your Personal Information to foreign countries for retention and other purposes relating to the operation of the Platform and the implementation of the Challenge or if our service providers are in foreign countries or use systems in foreign countries. In accessing the Platform, you agree that We may transfer your Personal Information to such foreign countries for these purposes.

## 12. Proof of date of publication and version of this Privacy Policy

A certificate signed by our Website Administrator will, unless the contrary is proven, be enough evidence of the date of publication and the content of the Privacy Policy and the content of earlier versions of the Privacy Policy and the date and content of any communication and notifications sent in terms of the Privacy Policy.

**Copyright in the Privacy Policy vests in the Foundation**

