

## DATA PROTECTION & PRIVACY POLICY - SOUTH AFRICA

12 December 2022

This privacy notice sets out what personal information we collect from you when you interact with, use and/or are displayed on the South African Hockey Association Fan App Platform (which could be our online platform, mobile site, an application or any other electronic platform), how we collect your personal information, why we collect it and how we use it, and other related matters.

**PLEASE READ THIS PRIVACY NOTICE CAREFULLY** to understand our practices regarding your personal information and how we will treat and maintain it.

### 1. Introduction

- 1.1 South African Hockey Association (Pty) Limited (“SAHA”) operates subject to laws of the Republic of South Africa. We are located at 21 North Street, Illovo Johannesburg 2196, Gauteng South Africa.
- 1.2 SAHA is the controller of Personal Information (used interchangeably with “Personal Data”) as described in the Protection of Personal Information, Act 4 of 2013 (“POPI”) and is also a “Responsible Party” for purposes of POPI. The processing of such Personal Information is described in this Privacy Policy.
- 1.3 SAHA takes your privacy very seriously. We strive to ensure that our use of your Personal Data is lawful and reasonable, with the ultimate goal being the improvement of our services and the enhancement of your viewing experience.
- 1.4 All Personal Data collected and stored by SAHA will be processed in accordance with the requirements of both local Privacy Laws, including POPI (applicable in South Africa) and international Privacy Laws including, the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (“GDPR”).
- 1.5 The provision of privacy, protection of Personal Information, and data protection in terms of international and transborder use and broadcasting shall be regulated in accordance with both local and international Privacy Laws.
- 1.6 This Privacy Policy describes how your Personal Data is processed at SAHA when you use our website, applications (the SAHA App), products, platforms and services, to browse or to access our content, including when you are not registered or signed-in to our service.
- 1.7 We also provide some ways for you to exercise control over your Personal Data, and to contact us if you have questions.
- 1.8 We encourage you to read this policy completely so that you understand how we rely on Personal Data to create the best possible experience for you. We also use this policy to call your attention to the information about Cookies that help power our offerings from a technical perspective.
- 1.9 Should you have any questions regarding the processing of Personal Data by SAHA and/or its regional representative offices, you can contact us at [ceo@sahockey.co.za](mailto:ceo@sahockey.co.za)
- 1.10 Unless stated otherwise, defined terms have the meaning given to them in the SAHA Terms and Conditions - South Africa, accessed at [www.sahockey.co.za](http://www.sahockey.co.za)

## 2. What Personal Data do we collect?

- 2.1 **Overview:** We may receive and collect Personal Data about you in several ways, whether we have asked for the information or not including when you download the SAHA App on your device; you sign up to use SAHA Platforms as a Subscriber, Register User and/or an Authorised User; you are a participant, spectator or official in a Sports Event; you stream, download, access or make use of any SAHA Platforms or Content (including when you decide on selection of Content), you contact our support centre, you participate in a marketing or promotional activity or you submit your Personal Data to us for any other reason, including by way of broadcast or streaming.

We may also receive Personal Data from third parties that have obtained it from you and that are permitted to share it with us. It does not apply to any other company or organisation, including those whose digital services that have links to SAHA's content or services. Third party services which have links to SAHA's content or services will govern the use of Personal Data you submit to them.

This information may also be collected by Cookies when you visit or use any of the platforms or SAHA Platforms within SAHA's stable of digital platforms. We do not accept any responsibility or liability for the privacy practices of such third-party digital services.

- 2.2 **Categories of Personal Data when you are signed into SAHA Platforms:** The categories of Personal Data of signed-in users that we collect include:

2.2.1 **Basic Account and Contact Information:** You may be required to provide an email address and password to create a SAHA Account. SAHA may also receive basic account information from third party sites, such as when you choose to sign in via a social network account;

2.2.2 **Preferences, user profile and other information:** We also collect and process certain information on your activity on the SAHA Platforms, SAHA Website and SAHA App, such as for **example:** title selections, viewing history, sport event preferences and content reviews if such option is available, and information about your SAHA Account (including information that you provide using your My Profile section), settings data and certain data inferred on their basis, in particular taste preferences based on your selection of Content;

2.2.3 **Events:** We collect certain information about your activities observed when you are accessing and using the SAHA Website, SAHA App or when you react to our marketing **communications**, including details of how, when and for how long you have accessed, viewed or used any of our platforms as well as details regarding site traffic and usage information (for example search queries, navigation behaviour and viewing time and duration), and, if enabled, voice commands processed through the SAHA App;

2.2.4 **Support services information:** We collect certain details of your interactions with the SAHA and or SAHA support centre (in case we can attribute the conversation to you), such as the date, time and reason for contacting SAHA or SAHA, transcripts of chat, email or other conversations;

2.2.5 **Cookies:** We may also store certain information collected via the use of cookies, web beacons, advertising IDs and other technologies, including ad data. For more information on cookies please refer to the Cookies section of this Privacy Policy;

2.2.6 **Device and Browser Information:** When you access the SAHA Website or the SAHA App, we may also collect information about the device or browser accessing the SAHA Platforms, such as unique device identifiers, IP address, type, model, settings, operating system, system activity and crash reports for your device and browser, such as unique device

identifiers, the type of device used to access SAHA Platforms, SAHA Website and SAHA Account, hardware model and settings, operating system, browser type, language, system activity, and crash reports;

**2.2.7 Location Information:** When you access the SAHA Website or the SAHA App, based on your IP address, we may determine the geographical location of a device used to access SAHA Platforms based on your IP address, however, such information determined does not go beyond the level of region. In addition, SAHA does not use GPS geolocation and does not collect geolocation data;

**2.2.8 Categories of data when you are not signed in to SAHA Platforms:** The categories of Personal Data of that we may collect when you are browsing the SAHA Website or the SAHA App without signing in include data referred to in the following sections: on Events (2.2.3), Cookies (2.2.5), Device and Browser Information (2.2.6) and Location Information (2.2.7);

**2.2.9 Children's' data:** SAHA expressly records and acknowledges that Personal Information of Children and Special Personal Information are applicable in terms of POPI. Where SAHA collects and stores Personal Information of Children it does so after having received the necessary Consent from a Competent Person, as required by the relevant provisions of POPI. Users of the App and Website must be at least 16 years of age or older to create an SAHA Account. While individuals under the age of 16 may use the SAHA Platforms, they may do so only under the supervision of a parent or a guardian; and

**2.2.10 Voluntary provision of data:** The provision of your Personal Data is voluntary but necessary to use some of the services offered by SAHA. Refusal to provide some of your Personal Data will make it impossible to use the SAHA Platforms or some of their functionalities, for example its websites, applications, products, platforms and services to browse or to access content, and will prevent SAHA from offering and performing such services.

## **For what purposes do we process Personal Data?**

**Overview:** We use the information we receive and collect generally for the purpose of providing, promoting, maintaining, personalising and improving our services, to develop new services, and to protect SAHA, our platforms, content partners and our users from fraudulent or illegal activity.

## **4. Purposes**

4.1 Specific purposes for which we process your data include:

4.1.1 processing Personal Data necessary for the purposes of conclusion and performance of the agreement with you, including:

4.1.2 to establish, personalise and maintain your SAHA Account, and to authenticate your identity when accessing your SAHA account, to provide you with content and to settle payments;

4.1.3 to provide you with a unique selection of titles tailored exclusively for you in the form of recommendations resulting from automated analysis of your actions made by you while using the SAHA Platforms;

4.1.4 to provide customer support services and to communicate with you, including to inform you about any changes to SAHA products and services; and

4.1.6 to provide cross-border portability of SAHA online content, including verification of the country of residence in accordance with and based on the Regulation of the European

Parliament and of the Council 2017/1128 on cross-border portability of online content services in the internal market;

4.1.7 processing of Personal Data in order to fulfil obligations resulting from provisions of applicable laws;

4.1.8 to fulfil any contractual obligations with our business partners for the purpose of offering SAHA Platforms and for the purposes of financial settlements connected thereto, which is our legitimate interest for processing Personal Data;

4.1.9 processing of Personal Data for marketing of the SAHA Platforms, including through advertising tailored for individual or group needs and preferences, for example online advertising, which is our legitimate interest for processing Personal Data;

4.1.10 processing for the purposes of research, analytics, development, improvement (including user experience improvement), administration, maintenance, technical support and security of the SAHA Platforms, SAHA Website and SAHA App, which is our legitimate interest for processing Personal Data;

4.1.11 processing for the purposes of establishment, exercise and defence of legal claims, enforcing or investigating potential violations of our terms of use or any other actual or alleged fraudulent activities, protecting rights, property or safety of SAHA, our customers, employees and other third parties, which is our legitimate interest for processing Personal Data; and

4.1.12 processing for the purposes of reorganisation of the SAHA group, including changes in ownership or control of assets, shares or management of SAHA, or that of our affiliates, which is our legitimate interest for processing Personal Data.

## **Who are the recipients of Personal Data?**

Your Personal Data may be disclosed to the following categories of recipients:

5.1.1 SAHA affiliates, which includes our region subsidiaries and entities that control or are under common control with SAHA, in particular when necessary for the ongoing maintenance and continued provision of the services to you;

5.1.2 Trusted service providers retained by us to enhance or provide services to you, acting at our instruction, including hosting services providers, platform development, support and security services providers, analytics tools and services providers, customer support services providers, payment and reconciliation services providers;

5.1.3 Marketing service providers supporting us in promoting the SAHA Platforms, including marketing agencies, suppliers and stakeholders, email distribution and other marketing tools providers, social media marketing services providers including Facebook and Google, as well as analytics services providers. Some SAHA Platforms may be integrated with external services, including social media networks. This may mean that information, for instance about your interests and activities, is tracked or extracted from other platforms (such as Facebook). If you are signed in to SAHA's digital platform that is integrated with other media tools, this information may be available to others depending on the privacy settings you have in place on these other platforms.

5.1.4 The number and nature of social media platforms is changing rapidly, and the way in which information is shared between them is becoming increasingly complex. To help you manage and protect your Personal Data, SAHA will ask you to opt-in before making your Personal Data available through an integrated service. You may also opt-out of your participation in most of SAHA's digital services. Information about how to opt-out will be

provided in the particular service. However, you should be aware that SAHA may continue to store Personal Data provided by you prior to you opting-out.

5.1.5 Your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party;

5.1.6 Partners who may offer access to the SAHA Platforms on our behalf and/or partners with whom SAHA co-operates with respect to placing the SAHA App or SAHA Website on their platforms;

5.1.7 Third parties, including governmental bodies, courts or bodies of similar nature, when it is required in order to comply with applicable laws, to enforce or investigate potential violations of our terms of use or any other contract between you and us, to protect our rights, property or safety or that of our customers, employees, and other third parties; and/or

5.1.8 Third parties in relation to reorganisation of the SAHA group, in particular a third party that acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates by any means, or a third party from whom we acquire, ownership or control of assets, shares or management.

5.2 Please note that SAHA offers services in jurisdictions located outside of South Africa and also outside of the European Economic Area. Some of the data recipients may be located outside the European Economic Area, in countries with respect to which the European Commission has not issued an adequacy decision ("**Third Country**").

5.3 Where Personal Data is transferred to a Third Country, SAHA takes legally required steps consistent with applicable European data protection legislation to ensure that the Personal Data is adequately protected in each such jurisdiction in particular by basing agreements with the relevant data recipients on the standard data protection clauses adopted by the European Commission or adopted by a supervisory authority and approved by the European Commission.

## 6. What are your rights?

6.1 Your data subject rights. You have the following rights with respect to your Personal Data processed by SAHA:

6.1.1 **Access:** You have the right to access your Personal Data;

6.1.2 **Rectification:** You can ask us to have inaccurate Personal Data amended. You can use the My Account section on the SAHA Website or the SAHA App to change basic information about you;

6.1.3 **Erasure:** You can ask us to erase Personal Data. Note that we will keep only Personal Data that is necessary for us to comply with financial and tax regulations and for the establishment, exercise or defence of legal claims;

6.1.4 **Object to marketing:** You can object to processing your Personal Data for marketing purposes;

6.1.5 **Object to other processing:** You can object to processing of your Personal Data based on the legitimate interest of SAHA unless we have a valid ground to continue processing the data;

6.1.6 **Portability:** You can ask us to receive your Personal Data that you provided to SAHA in machine-readable format or have such data transmitted to a third party; and

6.1.7 **Restriction:** We may be required to have your data restricted for processing in certain circumstances as defined in Article 19 of the GDPR or POPI.

6.1.8 **Exercise of your rights.** You can exercise your rights and lodge requests to SAHA using the My Data section in My Account on the SAHA Website or the SAHA App.

6.2 **Exercise of your objection to marketing:** You may object to direct email or messaging marketing communications from us by indicating your communications preference in the Marketing Email or messaging Preference section in My Account on the SAHA Website. You may also unsubscribe using the link included in every direct email and messaging marketing communication, it may take few days for this request to be processed. You cannot unsubscribe from service administration related e-mails. In the Marketing Preferences Section you may also opt-out from receiving push messages or from having your data processed for marketing purposes, with respect to other marketing, use the My Data section in My Account on the SAHA Website or the SAHA App. Please also see clause 10 – Cookies.

6.3 **Withdrawal of consent:** In some situations we may seek your consent for processing. In such case, you will have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal.

6.4 **Support centre:** Should you have any difficulties with exercising any of the rights referred to above using your SAHA Account, you may contact us at [support@sahockey.co.za](mailto:support@sahockey.co.za) for assistance (in such case, for security reasons you may be asked to confirm your request by logging into your SAHA account and upon such confirmation your request will be considered to be validly filed).

6.5 **Complaints:** You can raise a complaint about our processing with the data protection regulator in your jurisdiction. If you find it difficult to contact the data protection regulator, we will help you.

## 7. How long do we store data?

7.1 **Data Retention Principles:** We process your Personal Data during your subscription and following the end of your subscription to the extent that the data is necessary for the purposes with respect to which we are permitted and/or required to process data, in any event no longer than for the period of expiry of claims, including for the following purposes:

7.1.1 compliance with obligations resulting from applicable laws to which SAHA is subject;

7.1.2 establishment, exercise or defence of legal claims as well as for the purposes of any other legal proceedings or compliance with any judgments and/or decisions issued by public authorities;

7.1.3 research and analytics;

7.1.4 marketing of SAHA products and services; and

7.1.5 maintaining the SAHA Account.

7.2 **Access to your SAHA Account after Registered User or Subscriber account termination:** Following the termination of your subscription, or your SAHA Account will remain active for a period of five years. If you do not re-subscribe to the SAHA Platforms within that time, we will delete your SAHA Account and any related information to the extent that it is not used as set out in clause 6.1.

7.3 **Data retention Principles with respect to consent:** As outlined in clause 6.3 we might be processing your data on the basis of consent. In such event we process data only as long as the consent is valid and to the extent that the data is necessary for the purposes with respect to which we are permitted and/or required to process data.

7.4 Where appropriate, we will encrypt, pseudonymise, anonymise and/or segregate information so that we may make use of it in a manner that avoids unnecessary identification, in the interest of protecting your privacy and enhancing security practices.

## **8. Security**

8.1 Maintaining the security and integrity of your Personal Data is a high priority and we endeavour to maintain appropriate technical and organisational measures to secure the integrity of information, using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Data and to protect them from misuse, loss, alteration or destruction.

## **9. Direct marketing**

9.1 We may send you notices and direct email or message marketing communications from time to time about offers, newsletters or other recommendations or information which we may think will be relevant or interesting to you, in relation to SAHA or its Affiliates, including any marketing communications, offers or information from SAHA or Affiliates.

9.2 We may send you notices from time to time about marketing offers, newsletters or other recommendations or information which we may think will be relevant or interesting to you.

9.3 You may unsubscribe from these communications at any time, by following the unsubscribe link in the communication. suppliers, marketing agencies and stakeholders not necessarily related to the SAHA Platforms.

9.4 You can also contact us on the details provided for assistance in unsubscribing from direct marketing communications.

## **10. Cookies**

10.1 In order to ensure that the SAHA Website, SAHA App and SAHA Platforms work properly and to provide you with a personalised experience, we and certain of our third-party service providers may set cookies or similar technologies (such as in particular web beacons, pixels and advertising identifiers) on your device, subject to your consent where relevant. A cookie is a small text file that a website saves on your computer or mobile device when you visit the website. It enables the website to remember your actions and preferences (such as session status, language, font size and other display preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.

10.2 The SAHA Website uses two basic cookie types: session cookies and persistent cookies. Session cookies are temporary files stored on the user's end device until the user logs out, leaves the website or closes the software (web browser). Persistent cookies are stored on the user's end device for the time specified in the parameters of the cookies or until deleted by the user.

10.3 In many cases, the default setting so the web browsing software(web browser) enable cookie storage on the user's end device. You can delete or block cookies from being set in your web browser settings or relevant software. Cookies set by SAHA will likely be labelled as first party cookies, and those set by our partners will be labelled third party cookies. Certain parts of the SAHA Website, the SAHA Platforms or the SAHA App may not work properly if first party cookies are blocked or deleted.

10.4 The types of cookies and the purposes for which they are used on the SAHA Website and the SAHA App include:

- 10.4.1 strictly necessary cookies, which enable use of the services available on the SAHA Website and SAHA App, for example cookies used for authentication of users and cookies that ensure security;
- 10.4.2 performance cookies, which help us collect information about how the SAHA Website, the SAHA Platforms and the SAHA App are used, so that we can perform analytics and improve their performance;
- 10.4.3 functionality cookies, which remember choices made by the user and personalise the interface and allow enhanced functionality and personalisation of the SAHA Website, the SAHA Platforms and the SAHA App; and
- 10.4.4 targeting cookies and advertising IDs for delivering adverts more relevant to users and their interests, as well as ad conversion tracking; these cookies are mainly set by our advertising partners.
- 10.4.5 Third parties that engage in online behavioural advertising, or that provide such services to us as service providers, may offer additional control over this practice via a self-regulatory body called the European Interactive Digital Advertising Alliance. For further details regarding the collection of information by third-party advertising companies or to exercise choices over online behavioural advertising practices, visit <https://youronlinechoices.eu/>.

## **11. Changes to this Policy and final provisions**

11.1 We may change this Privacy Policy from time to time. If we do so, we will post the revised policy on our website and will inform users of such amendments and of their effective date.

11.2 In case of discrepancy between this document and the SAHA App End-User Licence Agreement (EULA), the provisions of this Privacy Policy will prevail.

11.3 This version of the SAHA Privacy Policy applies from 12 December 2022.