

[Our Privacy Policy](#)

[Our Cookie Policy](#)

## PRIVACY POLICY

### 1. Introduction

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our services and your experience.

This privacy policy sets out what personal information we collect from you when you use our site (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 related matters.

Please read this privacy policy carefully to understand our views and practices regarding your personal information and how we will treat it (even if you're a long-standing site user) and contact us if you need any clarity or assistance, using the contact details set out at the end of this policy.

This privacy policy is applicable to MultiChoice Africa Holdings BV. in the countries in Africa where we operate (excluding South Africa). This privacy policy should be read in conjunction with our standard terms and conditions. Note that this policy must be applied with due consideration and compliance with local country consumer protection and other consumer laws as applicable.

For Irdeto customers, please visit the Irdeto online platform at [www.irdeto.com](http://www.irdeto.com) for their specific terms and conditions and their privacy and cookie policies.

For Showmax customers, please visit the Showmax online platform at [www.showmax.com](http://www.showmax.com) for their specific terms and conditions and their privacy and cookie policies.

For MultiChoice South Africa customers, please view the applicable entity online platform where you will find their terms and conditions and privacy and cookie policies.

All the above sites can be accessed from our main MultiChoice Group online platform [www.multichoice.com](http://www.multichoice.com)

### 2. Application of this policy

This privacy policy applies to you as a customer or as a guest, namely a person who accesses or registers on our platforms, regardless of the device which you use to access it (e.g. a computer, mobile phone, tablet etc).

This privacy policy does not apply to other parties' sites, products or services, such as sites linked to, from or advertised on our site, or sites which link to or advertise our site.

### 3. What is personal information?

Personal information refers to information about an identifiable person, such as your name and surname, gender, age, date of birth, contact details (phone number and email) and address, physical location, ID number and your image.

Other information which might be "personal" information may include:

- "device and device event information": IP address, unique device identifier, the nature of the device which you used to access our site, the geographic location of your device, hardware

model and settings, operating system details, browser type and version, browser language, system activity and crashes;

- “log information”: such as details of how, when and for how long you accessed and used our site and other site traffic and use information, landing pages, which pages you accessed and viewed, the amount of time spent and what you did on those pages, details about games you played, how you interacted with other site users, and exit pages.;
- “location information”: We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location); and
- “unique application numbers”: Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to us when you install or uninstall such a service or when that service periodically contacts our servers, such as for automatic updates.

#### **4. How we collect your personal information**

We collect your personal information in four ways, namely

- actively from you;
- passively from your device when you use our site;
- passively from social networking sites (subject to your privacy settings); and
- passively from companies in the MultiChoice Group of companies (our “affiliates”) and third party service providers.

#### **5. Active collection of personal information**

Some areas of our site may require you to submit certain information in order for you to register for certain services or benefit from specified features, such as when you register on our platforms, request to receive any newsletters or similar subscriptions or tips/pointers, or participate in a particular activity, such as a game, promotional competition or other promotion (collectively referred to as the “value added services”). If you contact us, we may keep a record of that correspondence.

If you want to take advantage of any of our site sharing features, we will ask you to create a publicly visible profile, indicating, for example, your username, e-mail address and, if you so wish, your photo.

Our site may also collect personal information from you by asking you specific questions and by permitting you to communicate directly with us, for example via e-mail, feedback forms, site comments and forums.

In these situations, we will

- ask you for particular information;
- inform you at each information point what information is required and what information is optional; and
- indicate the consequences if you don't give us the relevant information. (You will generally need to provide us with the relevant information in order to take full advantage of our platform features.)

The information we may actively collect from you may include your:

- identifying information (e.g. your name, surname, username, unique identifier (if you haven't chosen a username), gender, date of birth, profile picture and physical location);
- contact details (e.g. e-mail address and phone number); and
- other information which we may request from you from time to time.

## 6. Passive collection of personal information from your device

We passively collect some of your personal information from the device which you use to access and navigate through our site, using various technological means.

One of the key ways in which we collect information passively is using server logs to collect and maintain log information.

We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit our site, to distinguish you from other site users and to improve our service to you. Please refer to our Cookie Policy [here](#)

## 7. Passive collection of personal information from social networking sites (with your permission)

We may allow you to log onto our site, or create a profile on our site, by using Facebook Connect or another social networking site authentication option.

By collecting information from social networking sites we enable you to enrich your profile on our site, your game-play and your social experience by enabling you to share your information (e.g. posts, photos, videos, contacts, etc) which is stored on that site without you having to actively give us all that information – all you need to do is login using your username and password and give us your permission to access and use that information.

There are two kinds of information which we collect from social networking sites, namely basic information and extended information.

### Basic information

Basic information is information which you have put on a social networking site which you have made public in accordance with your privacy settings on the relevant social networking site.

This could include your name and surname, username or user-ID number, your profile picture or its URL, your e-mail address, the physical location of your device, your gender, your date of birth, and any other information which you have decided to share publicly (i.e. the information which you have put on your social networking site profile for anyone to see).

We will access your basic information from a social networking site only:

- when you log on to a social networking site from our site or if you select the “keep me logged in” function;
- with your permission; and
- in line with your privacy settings on the relevant social networking site.

### Extended information

Extended information is information which you have put on a social networking site over and above the basic information. This could include your additional identifying information and contact details, biographical information, educational history, personal preferences, religion, your “friends” or contacts on the social networking site, your “likes” and “dislikes”, information you have “shared”, your recommendations to your friends or other social networking site contacts, your game scores and rankings, and any other information which you have put on, or actions you have done, on a social

networking site, and any other information which you permit us, from time to time, to passively collect from a social networking site.

We will collect from the relevant social networking site your extended information only if and to the extent that you give us permission to do so. You can decide the layers of extended information which you want to share with us and manage it either through our site or the relevant social networking site (e.g. you might decide, depending on your personal preferences, to allow us to post on your wall when you win a game or to send a notification to your Facebook friends on your behalf).

We may offer you the ability to import your address book contacts or to manually enter third parties' contact details in order to populate your invite list on our site ("your contacts"). You may authorise us to send your communications to your contacts on your behalf (e.g. to send your contact an e-mail or notification from you or on your behalf inviting him/her to join your online game sports pool).

Each application on our site will have its own default privacy setting. You can manage your settings at the time of giving us your permission or at any time thereafter by clicking on "My Profile" on the applicable platform, or in any other manner which we make available from time to time.

Your permission will expire if you do not access our site for a period of 60 continuous days. If it expires, you will need to refresh it when you next log in to our site.

We only receive information from social networking sites – we do not give them access to any of your personal information.

## **8. Passive collection of personal information from our affiliates and third party service providers**

We collect some personal information passively from our affiliates and third-party service providers, purely to supplement information which you have already agreed to give us, to supplement your user profile on our site.

## **9. Why we collect your personal information and how we use it**

We use the information we collect to provide, maintain, and improve our services, to develop new ones, and to protect us, our services and our users. We constantly strive to improve our users' experience, and so we also use the information we collect in order to offer you information and content which is more appropriately tailored for you.

We may collect and use your personal information to:

- establish and verify your identity;
- to create your user account and ensure that it doesn't duplicate an existing user account on our site (if you have an existing user account, we will merge the two accounts on our computer systems) and allow use of our site, products and services;
- maintain and update our databases;
- communicate with you in various ways (determined by you in your privacy settings), such as e-mail, post, telephonically, SMS notifications, instant messaging or other notifications to your device (e.g. on-screen pop-up messages);
- enable user to user communications;
- request feedback on our site, products and servers, address any issues and liaise with users in that regard;
- keep a record of our communications with you and your communications with us;
- fulfil any contractual obligations we may have to you or any third party;
- provide you with value added services;

- to identify and inform you of points of interest or goods and services of interest near to your location, using your location information;
- improve the content of our site and our products and services;
- allow you to participate in any interactive features and sharing features that may be active on our site;
- combine your personal information from a social networking site with the information on our site to streamline and complete our records and to make it easier for you to share things with people you know;
- improve your user experience and the overall quality of our services;
- customise our site to your preferences and tailor information and content for you to ensure that it is presented in the most effective manner for you and for your device;
- inform you of facts relating to your access to and use of our site;
- inform you about our products and services which we think may interest you (as long as you have consented to this);
- inform you about competitions, promotions and special offers from us (as long as you have consented to this);
- inform you about any changes to our site, our products and services, our terms of use, this privacy policy or other changes which are relevant to you;
- carry out marketing, product research and development;
- to tailor general advertising on our platforms more appropriately for particular user groups;
- to compile and use statistical information about you and other users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc which we may use to develop, provide and improve our platforms and our products and services, including recommendations to users and tailoring information and content for users;
- to compile, use, disclose and trade with non-personal statistical information about our users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc. which we and our advertisers may use to develop, provide and improve our platforms and our products and services, including targeted advertising to user groups. Please note that the information referred to in this paragraph is aggregate information about our users which has de-identified users' personal information such that it cannot be linked back to identify you. We will not disclose your identifiable personal information to anyone without your express permission;
- diagnose and deal with technical issues and customer support queries and other user queries, such as problems with our server, determine the optimal and fastest route for your device to use in connecting with our site, and administer, maintain and secure our platforms;
- detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorised use of our site and contravention of this privacy policy;
- comply with the law or with any legal process; and
- other activities not specifically mentioned which are lawful, reasonable, relevant to our business activities, and the minimum necessary and adequate for us to provide our platforms, and our products and services.

We will get your permission before collecting or using your personal information for any other purpose.

## 10. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you. Access to this information may be subject to an administrative fee if your request is manifestly unfounded, excessive or repetitive.

- Right of accuracy – you have a right to insist that we correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Access to this information may be subject to an administrative fee if your request is manifestly unfounded, excessive or repetitive.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing of your data.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation or provided to you in a machine-readable format.
- Right to object – you have the right to object or remove your consent for certain types of processing such as direct marketing.
- Right to object to automated processing, including automated profiling unless such profiling is necessary to conclude a contract or the performance required by a contract between us and you – and we apply suitable measures to safeguard your personal information.
- You have the right to complain if you have cause to be concerned about the way we capture, treat or process your personal information. You may view and use our complaint lodging process [here](#)

In order to verify your identity should you request a copy of your data or information about your data, we may ask for a copy of your passport, driving licence, national identity card or birth certificate.

## 11. Compulsory and optional information and consequences of not sharing it with us

Only the following information is compulsory: Your e-mail address and username. In order to access any of the value-added services you will need to identify yourself as a MultiChoice subscriber with a SmartCard number of a living person (not a bot).

All other information is optional. If you do not agree to share your compulsory information with us, then you will not be able to make full use of the features that are offered to registered users. If you do not agree to share your optional information with us, then you may not be able to enjoy all of our platform features and functionality.

## 12. Retention of your personal information

We retain all personal information which we collect from you (except for the information referred to below) unless there is a valid technical, legal or business reason for us to delete, destroy or de identify it (“retained information”).

We will not retain the following information if you ask us not to –

- your contacts information as contemplated in section 8 above, unless that contact is a registered user on our site who has given us permission to store their information;
- communications which we have sent on your behalf as contemplated in Section 8 above;
- the content of your public communications via our site with site users or third parties for as long as the relevant site feature remains active.

We may keep all retained information for as long as you continue to access our site and for three years thereafter:

- if you do not access our site for a consecutive period of two and a half years we will inform you that your account is dormant; and
- if you do not access our site for a further six months after the dormancy notification, we will delete, destroy or de identify all your personal information from our records except for information which we store for historical, statistical or research purposes.

Notwithstanding the above, and any other provision of this privacy policy, we may keep some or all of your personal information if and for as long as:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

### **13. Disclosure of your personal information**

We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy policy or with your permission.

We may disclose or share your personal information to or with:

- our affiliates;
- our employees, contractors and agents if and to the extent that they need to know that information in order to process it for us and to provide services for or to us, such as site hosting, development and administration, technical support, financial services such as processing of payments, delivery services, marketing services (only in respect of our site, products and services) and other support services;
- in order to enforce or apply our terms of use or any other contract between you and us;
- in order to protect our rights, property or safety or that of our customers, employees, contractors, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;
- any third party who acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates, and our site, whether by sale, merger, acquisition or otherwise, and to any third party from who we acquire (or propose to acquire) ownership or control of assets, shares or management, whether by purchase, merger, acquisition or otherwise;
- governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
  - comply with the law or with any legal process;
  - protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;
  - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy policy;
  - protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

We may use your personal information to compile profiles for statistical purposes and may freely trade with such profiles and statistical data, provided that the profiles or statistical data cannot be linked back to you by a third party.

We will get your permission before disclosing your personal information to any third party for any other purpose.

### **14. Direct marketing**

When you register on our platforms you may choose whether to receive marketing communications from us. You may also manage it in your privacy settings on our site.

You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing (“direct marketing communications”).

You may opt out of receiving direct marketing communications from us:

- at the time of registering on our platforms by ticking the relevant “opt-out” box; and
- at any time by requesting us (in any manner, whether telephonically, electronically, in writing or in person) to desist from initiating any direct marketing to you.

If you have opted out in accordance with the above, we will:

- send you written (which may include electronic writing) confirmation of receipt of your opt out request; and
- not send you any further direct marketing communications.

You may (in terms of the Consumer Protection Act, 2008) register a pre-emptive block against direct marketing communications. If you do so, we will not send you direct marketing communications unless you have expressly consented to receiving direct marketing communications from us.

We will not send you direct marketing communications at home at any period during which it is prohibited by law to do so, unless you have expressly or implicitly requested or agreed otherwise.

## 15. Security

All information you provide to us is stored on our secure servers or those of our trusted partner services.

We implement appropriate, generally accepted technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, including encryption where appropriate.

Unfortunately, the transmission of information via the Internet is not completely secure. We will do our best to protect your personal information, but we cannot guarantee 100% security of your data transmitted to our servers using the internet and any transmission is at your own risk.

We take reasonable technical and organisational measures to secure the integrity of information we collect about you, using accepted technological standards to –

- prevent unauthorised access to or disclosure of your personal information; and
- protect your personal information from misuse, loss, alteration or destruction.

In particular:

- We require you to enter a password when logging in to our site.
- We do not require your credit card details, Internet banking details or PIN numbers for any purpose. If we need to make a payment to you (e.g. if you win a prize), we will send you an e-mail requesting your banking details and make payment directly into your chosen bank account. We will keep the payment records (for finance, recordkeeping and audit purposes) on secure servers. We will not disclose your banking details to any third party except to the extent necessary to process and record payments.
- Where we allocate you or replace a password which enables you to access certain parts of our site, we will do so in an automated manner and we do not store it. You are responsible for keeping your password confidential. Please notify us immediately and change your password if you become aware that your password has or may have become compromised or accessed by an unauthorised person.

- From time to time we review our information collection, storage and processing practices, including physical security measures, to keep up to date with best practice.
- We create a secure back-up for operational and safety purposes.

## 16. Linking to third party sites

We are not responsible for the privacy practices of a third-party site to which there may be a link on our site or to which you may log in from our site (e.g. integrated social networking services).

We advise you to read the privacy policy of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

In certain instances, we may give you the option to manage some of your privacy settings on integrated social networking sites from our sites (e.g. to enable you to determine which of your personal information you would like to share via our site).

## 17. Changes to this policy

We may change this privacy policy from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy policy (including, if we have your e mail address, e-mailing you notifications of the updated privacy policy).

## 18. Queries and complaints

### Complaints

This privacy policy gives effect to many of our responsibilities as a responsible party or a data controller in terms of the applicable legislation in the respective countries where we operate.

If you have a concern about the way we are handling your information, for example if you feel we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;
- are misusing of your personal information;
- are keeping personal information about you for longer than is necessary;
- hold inaccurate personal information about you;
- have disclosed personal information about you;
- have collected personal information for one reason and is using it for something else; or
- have accessed your personal information without your authorization.

If you wish to complain about how we have processed your personal information, or how your complaint has been handled, please contact us with the following information by sending an email to [privacy@multichoice.com](mailto:privacy@multichoice.com).

- Full name of the person lodging the complaint
- Contact details such as email address and telephone number
- How the personal data was collected (if known)
- All necessary information (such as your account number and what you think we have done wrong)
- The timeframe over which the suspected wrongdoing occurred (if known)
- Any evidence in support of the complaint

Our local Data Protection Officer (DPO) or Information Officer (IO), will acknowledge receipt of your complaint within 20 business days.

While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our DPO will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken.

If you are unhappy with how your complaint was handled, or the outcome of your complaint, then you may appeal, by writing to our head of compliance at [compliance@multichoice.com](mailto:compliance@multichoice.com), outlining your reasons.

If you remain unhappy after the appeals process you may forward your complaint to the GDPR Regulator:

Autoriteit Persoonsgegevens  
Postbus 93374  
2509 AJ DEN HAAG

Telephone number: (+31) - (0)70 - 888 85 00  
Fax: (+31) - (0)70 - 888 85 01

### **Abusive, persistent or vexatious correspondence and complaints**

For the purposes of lodging complaints, it is the complaint which must be vexatious and not the individual making the complaint.

While we differentiate between people who make numerous complaints because they think things have gone wrong and people who are simply being difficult, we do understand that sometimes complainants act in distress, and we will make reasonable allowance for that.

We may decide not to attend to the complaint based on one or more of the following reasons:

- Persisting in a complaint after being advised that there are insufficient or no grounds for your complaint or that we are not the appropriate body.
- Refusing to co-operate with the complaints process, without good reason, but still wanting your complaint to be resolved, including a failure or refusal to specify the grounds of a complaint despite offers of assistance,
- changing the basis of the complaint as inquiries of a complaint despite offers of assistance,
- changing the basis of the complaint as inquiries are made and introducing trivial or irrelevant new information and expecting this to be taken into account and commented on.
- Submitting repeat complaints, after the complaint procedure has been completed essentially about the same issues, with additions/variations which the Complainant then insists on being treated as new complaints and put through the full complaint procedure again.
- Refusing to accept the outcome of the procedure after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.

### **Queries**

We hope this notice has helped you to understand how and why we collect and process your personal data to enable you to use our site and our services.

If you are a customer of a MultiChoice South Africa company and wish to know more about how your personal data is being processed by us (or any of our third parties), please contact our Data Privacy Officer at [privacy@multichoice.com](mailto:privacy@multichoice.com). This email address is actively monitored, and we endeavour to respond to all requests within 20 business days.

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## COOKIE POLICY

### 1. Introduction

Our online platform and mobile app use cookies. Insofar as those cookies are not strictly necessary for the provision of our online platform, mobile app and services, we will ask you to consent to our use of cookies when you first visit our online platform or install and open our mobile app.

### 2. About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### 3. Why we use Cookies

We use cookies for the following purposes:

- Authentication - we use cookies to identify you when you visit our online platform and as you navigate our online platform;
- Status - we use cookies to help us to determine if you are logged into our online platform;
- Personalisation - we use cookies to store information about your preferences and to personalise our online platform for you;
- Advertising - we use cookies to help us to display advertisements that will be relevant to you; and
- Analysis - we use cookies to help us to analyse the use and performance of our online platform and services.
- Accuracy – we use cookies to help us ensure our records are complete and up to date.

The information which we may passively collect from your device may include your identifying information, contact details, device and device event information, site activity information, log information, telephony log information, location information, unique application numbers (see paragraph 9 above) and any other information which you permit us, from time to time, to passively collect from your device.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

### 4. Cookies used by our Service Providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our online platform.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

Any questions? Please contact [enquiries@multichoice.co.za](mailto:enquiries@multichoice.co.za)

## 5. Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647?hl=en> (Chrome)

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox)

<http://www.opera.com/help/tutorials/security/cookies/> (Opera)

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer)

<https://support.apple.com/kb/PH21411> (Safari)

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge)

If you block cookies for this online platform, you may not be able to use all the features available on the site.

## 6. Contact Us

You can contact us:

using our contact process or by email, using [privacy@multichoice.com](mailto:privacy@multichoice.com)

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### Version Control

Version	Date	Comment
1.0	21 January 2019	