

Privacy Policy

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Please read this Privacy Notice carefully to understand how we handle your personal information. If you do not agree with this Privacy Notice, please do not use our Website and/or Services.

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1. INTRODUCTION

This Notice applies to the business activities of Lesaka Utilities (Pty) Ltd (**'Lesaka'**, **'we'**, **'us'** or **'our'**) and describes how and why we collect, store, use, and/or share (**'process'**) your personal information.

2. WHEN DOES THIS NOTICE APPLY?

This Notice applies to the personal information we collect about:

- Users of our Website, www.recharger.co.za, which includes users of our Lesaka Recharger Tenant App;
- Our current, former, and prospective customers and business partners;
- Users and recipients of our Services; and
- Subscribers to our email newsletter.

It does not apply to the personal information that we collect from our employees.

This Notice must be read with any other documents, agreements and privacy notices that describe how we process your personal information. If there is any conflict, the terms of the specific document will apply.

3. CONTACT US

For any questions concerning this Notice, your data protection rights, access to information rights and any complaints, you may contact our Information Officer at:

- Email Address:
- Telephone No:

Our corporation registration information is as follows:

- Corporation Registration Number:
- Registered Address:
- Email Address for other inquiries: onlinestore@recharger.co.za

Further contact information and contact forms are available in our PAIA Manual.

4. OUR SERVICES

Lesaka is a vendor of prepaid electricity sub-meters and a provider of prepaid metering services. We are not a provider of electricity or an agent for electricity providers or similar services. We do not manufacture, instal or uninstall prepaid sub-meters. (**"our Services"**).

5. WHAT PERSONAL INFORMATION DO WE COLLECT?

We may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your personal information in the manner as set out in this Privacy Notice. When we perform one or more of these actions, we are "**processing**" your personal information.

The personal information we collect may differ according to the Services you receive from us.

You do not have to provide us with your personal information to access much of the Website. If you choose not to disclose certain information, you can still visit our Website, but you will not be able to create an account with us to register your prepaid meter or make use of our services on the Lesaka Recharger Tenant App. If you do not register your prepaid meter with us, then you may be unable to access certain Services and we may be unable to fully respond to your inquiries.

Information Collected Directly from You.

We may collect personal information about you directly from you or from your company or organization. For example, when you fill out a 'Registration' form to register your prepaid meter with us, or otherwise provide us information through our Website, we may collect personal information such as:

Type of information	Purpose
Your Name, company name, and title/position.	To identify you and your business association (where applicable).
Government issued identity numbers of all signatories, and company registration number.	To verify your identity and the business registration. To ensure you are authorised to use and purchase the Services.
Your email address, phone number, fax number, and contact details on WhatsApp.	To receive your registration information, and to communicate with you regarding the Services, such as sending updates, providing support, receiving your registration submission, and facilitating the purchase of tokens.
Your Lesaka Utilities meter details and usage data.	To link a Lesaka Utilities meter to you, to perform our obligations to you to carry out the Services, and to identify any issues or faults that need to be addressed.
The address at which the Lesaka Utilities meters are installed.	To locate and link a Lesaka Utilities meter to you, to carry out the Services, to respond to any queries or complaints, for billing purposes, and to identify areas with high or low usage.
Your preferences about vending options (e.g. chain store or private vending).	To understand your preferences and provide you with options for purchasing tokens for prepaid electricity that are convenient for you.

Your mandate (if acting as an Agent).	To verify your authority to register a meter on behalf of a landlord or company.
Delivery address	To deliver products purchased by you on our Website.

When you sign-up for our e-newsletter we will only collect your email address.

Special or sensitive personal information.

We do not collect or process special category information from you.

When you register your Lesaka Utilities meter with us, we will collect the following sensitive information:

Type of information	Purpose
Your bank account details.	To facilitate payment for tokens. This information is also necessary for billing purposes and for processing reimbursements, if necessary.
Payment card details	To process your payment for your purchase on our Website. When using a direct payment gateway to complete your purchase, your payment card information will be stored by Shopify. Shopify encrypts and stores your card details in compliance with the Payment Card Industry Data Security Standard (PCI-DSS). Your payment card details will only be kept for as long as it is required to complete your purchase. Once the transaction is completed, this information will be deleted.
copies of government issued identity documents of all signatories	This is to verify the identities of the signatories.

Automatically Collected Information

We may passively collect certain categories of your technical and usage information from the devices that you use to access and navigate our Website ("**Access Devices**") using your browser's cookies.

For example, when you view our Website, we can see:

- what you click,
- what you view,
- how long you spend on pages,
- your device and internet connection details such as: type of device you are using, IP address and details about your internet connection, technical details such as your screen size and the software you are using, such as your web browser,
- your country or region (not exactly where you are unless we ask permission), and

- your unique advertising or other identification numbers allocated to your browser or device.

We don't often know exactly who you are from this data. But sometimes we may connect this data with other information we hold about you, for example, when you submit a form

Information Collected from Third Parties

We may also receive your personal information indirectly from, among others, the following sources (including public parties):

- Cookies and similar technologies, these are set on your device by us and our trusted partners, such as Google Analytics.

To opt out of being tracked by Google Analytics across all websites, visit: <http://tools.google.com/dlpage/gaoptout>.

- third party social networks (such as Facebook and Google) if you interact with us through them;
- advertising interactions (if you interact with on one of our ads on a third party website, we may receive information about that interaction);
- from other responsible parties where we act as contracted outsourced processors ("**Operators**") or co-responsible parties in performing our Services, including:

○ Banks and other financial institutions.	○ Owner(s) of your Lesaka Utilities meter.
○ Payment gateways and processors.	○ Our technology providers and marketplaces such as Shopify, Takealot and other retail partners.

- Our customers may occasionally supply us with their customers personal information to allow us to respond to any queries or complaints concerning our products and services.

6. WHY WE USE YOUR PERSONAL INFORMATION

6.1. Consent

We may process:

- your contact data for marketing purposes;
- your credit history if we conduct credit checks; and
- cookies to distinguish users and improve your experience on our website.

You may withdraw your consent at any time after giving it by clicking unsubscribe on the marketing communication received or by emailing our Information Officer.

To withdraw your consent for cookies, simply change your cookies preferences on our Website or your browser.

6.2. **Contract**

We process your personal information if it is necessary to perform under a contract we have with you, or at your request before entering a contract with you. This includes to:

- **identify** you;
- **provide** you with **our Services**, aftersales **support** and **solutions** requested;
- **manage** a **product or service purchased** by you or your customer;
- process **your requests, orders or instructions**;
- **collect payments** for our Services rendered;
- **respond** to customer enquiries and complaints;
- meet record-keeping **obligations**;
- **enforce** any agreement we have with you;
- **transfer** limited and necessary personal information **to our contracted service providers** (such **delivery agents**) to perform our obligations to you;
- **check** the **accuracy** of your personal information; and
- achieve other related and lawful purposes brought to your attention.

6.3. **By law**

We process personal information to comply with our legal obligations, for example to:

- **verify** your **identity** and **age**;
- **comply** with our **legal obligations** concerning tax, audit, insurance, customs, shipments and legal process;
- **fulfil** reporting requirements and **data subject access requests**; and
- meet our regulatory and record-keeping **obligations**;

6.4. **Legitimate interests**

We process personal information when it is necessary to pursue your legitimate interests or our legitimate interests. This includes to:

- **answer** any requests or questions you might have;
- **provide** you with information about the things we create or do;

- **assess our transactional risk** and your likelihood of defaulting on any credit terms;
- detect, prevent and investigate fraud, security breaches, misuse, and other **prohibited or illegal activity**, claims and liabilities;
- **protect our rights** in any litigation that may involve you;
- **enforce and defend other legal claims**;
- manage **business continuity** and emergencies;
- analyse and **gather metrics** to better understand how you use our website, our Services, or our Lesaka Utilities meters, and to evaluate and improve them;
- conduct market research and analysis to better understand our customer needs and preferences, and to develop new and improved products and services;
- find offers and products that may be of interest to you;
- learn how useful our marketing is and make it better;
- achieve other purposes described to you when collecting your information.

6.5. **Third-party collection**

When we collect your personal information from third parties it is because such third parties have:

- **authorised or instructed** us to do so; and
- have represented to us (either express or implied) that:
 - ⊕ their instructions are lawful;
 - ⊕ they are allowed to disclose such personal information to us;
 - ⊕ **they will**, where required by law, **obtain** the necessary **consent** or **justify** the necessary interests pursued, and provide all necessary privacy notices to you as a data subject.

We use your personal information only for the purpose for which it was originally collected by the relevant Responsible Party and strictly following their instructions and authorisation.

6.6. **When you provide us with information about others**

If you provide us with personal information **about someone else** (like your customers or your tenants), **you are responsible** for ensuring that you comply with any obligations and consent requirements under applicable data protection laws concerning such disclosure. You must provide them notice and you confirm that you have, if required by law, obtained the individual's consent to provide us with this personal information. It is your responsibility to explain to them how we

collect, use, disclose and retain their personal information, or otherwise direct them to read this Notice.

6.7. **Combined data**

For the purposes discussed in this Privacy Notice, we may combine the data that we collect through the Services with data that we receive from other sources, and use and share such combined data following this Privacy Notice.

6.8. **Further processing limitation**

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you and our customers notice.

7. **CONSEQUENCES OF NOT SHARING COMPULSORY INFORMATION WITH US**

Where we must process certain personal information by law, or in terms of a contract that we have entered into with you, and you fail to provide such personal information when requested to do so, we may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, we may be required to terminate the contract or relationship with you, upon due notice to you and according to contractual Terms and Conditions that apply to you.

8. **AUTOMATED DECISIONS ABOUT YOU**

We do not use your personal information to make any automated decisions or profiling about you.

9. **DISCLOSURE OF PERSONAL INFORMATION**

We may share your personal information with third-party vendors, service providers, contractors or agents (“**third parties**”) who perform services for us or on our behalf and require access to such information strictly to do that work. For example, sharing a delivery address and contact information with trusted couriers to facilitate the delivery of your order.

The disclosure of information will always be subject to applicable regulatory requirements on confidentiality and appropriate data protection measures.

We will also ensure we have contracts in place with our third parties which are designed to help safeguard your personal information. This means they cannot do anything with your information unless we have instructed them to do it and they will also not share your personal information with any other organisation apart from us.

The categories of third parties we may share your information with are as follows:

- cloud computing and data storage services;
- data analytics services such as Google Analytics;
- electronic forms builders and processors for our Website such as Hulk Form Builder;

- When you fill out a form on our Website, the information that you submit will be collated into an email and sent to us.

- security and authentication services: -

- for example, our service providers may look at all use of our Website to help block malicious activity. This helps keep you and us safe;
- one of our security providers is Google ReCAPTCHA. Google asks us to tell you that this is subject to the [Google Privacy Policy](#) and [Terms of Use](#).

- regulatory authorities **when required by legislation or by a Court Order**.

We may also share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our Affiliates, in which case we will require those affiliates to honour this Privacy Notice. “**Affiliates**” include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

- for example, if we, in good faith, believe that such access, retention or disclosure to our Affiliate is reasonably necessary to:

- comply with legal process (e.g., a subpoena or court order);
- enforce our terms and conditions, this Privacy Notice, or other contracts with you, including investigating any potential violations to such terms and policies;
- respond to claims that any content violates the rights of third parties;
- respond to your requests for customer service; or
- to mitigate any reasonable risk, or to protect the rights, property or personal safety of the Affiliate and its service providers, its customers or the public.

- **As you direct us,** we may also disclose your personal information in other ways you direct us to.

10. **DO WE TRANSFER YOUR INFORMATION OUTSIDE OF SOUTH AFRICA?**

The Information we collect about you will be processed in South Africa.

However, we reserve the right to transfer to and/or store your personal information on servers in a country other than where it was collected, and in a jurisdiction that may not have comparable data protection legislation to South Africa. If we do, we will take reasonable steps to ensure that your personal information has an appropriate level of protection and that the transfer is in line with applicable legal requirements.

11. **SECURITY AND INTEGRITY**

We will take reasonable technical and organisational steps to protect all personal information held by us in line with industry best practices, including protection against accidental or unlawful destruction, accidental loss or alteration, and unauthorised disclosure or access. This includes to:

- keep systems secure (such as monitoring access and usage);
- control access to our premises, systems and records on a strict need-to-know basis;
- safely destroy records;
- encrypt and/or password protect sensitive data;
- use firewalls and anti-virus software;
- test the security of our IT systems regularly;
- ensure our payment gateways comply with PCI-DSS;
- require our staff and any third-parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information; and
- review how we collect, store and use information, including security measures.

We will notify you and the relevant regulatory authorities of any data breaches where we are legally required to do so and within the prescribed period.

12. **RETENTION AND DELETION**

We will keep your personal information for as long as needed to meet the purposes listed in this Privacy Notice. We may need to keep your information for longer where we need the information to comply with regulatory or legal requirements, help detect or prevent fraud and financial crime, or answer requests from regulators.

If there are no other lawful grounds for us to continue processing your personal information, we will destroy such data using secure methods.

When Lesaka Utilities receives personal information from customers and acts as a data processor or service provider, we abide by the retention period set forth by our customers.

13. **INTEGRITY AND AVAILABILITY**

We will take reasonable steps to ensure that your personal information is accurate and complete.

Anyone about whom we maintain personal information may request to inspect and, if appropriate, correct the personal information held by us by following our [Access to Information Manual](#). **It is your responsibility to inform us should your personal information be incorrect, incomplete, misleading or out-of-date by contacting us.**

14. **DATA MINIMISATION**

We will only collect information that is relevant and necessary for us to perform the relevant activity.

We have procedures in place to destroy information given to us by you or a third party that is surplus to our requirements.

15. **YOUR DATA PROTECTION RIGHTS**

Data protection laws grant you the following rights:

- **Request access to your personal information** – You may ask us free of charge to confirm that we hold your personal information, or ask us to provide you with details, at a fee, how we have processed your data, which can be done by submitting [PAIA Form 2](#) to us;
- **Request the correction of your personal information** – to ensure any incomplete or inaccurate personal information is corrected by submitting [POPI Form 2](#) to us;
- **Request erasure of your personal information** – where there is no lawful basis for the retention or continued processing of your personal information by submitting [POPI Form 2](#) to us;
- **Object to the processing of your personal information for a legitimate interest (or those of a third party)** – under certain conditions where you feel it impacts your fundamental rights and freedoms by submitting [POPI Form 1](#) to us;
- **Request restriction of processing of your personal information** – to restrict or suspend the processing of your personal information to limited circumstances submitting [POPI Form 1](#) to us;
- **Withdraw consent given in respect of the processing of your personal information at any time** – withdrawal of consent will not affect the lawfulness of any processing conducted before your withdrawal notice. It may also not affect the continued processing of your personal information in

instances where your consent is not required. To withdraw your consent – email our Information Officer stating that you “*withdraw your consent for Lesaka Utilities to process your personal information.*”

You can exercise your rights by contacting us using the details set out in the ‘**Contact Us**’ section above. We will respond **within 30 calendar days**. The relevant forms to be completed in exercising your rights are also available on the website of the Information Regulator of South Africa, or in our PAIA Manual.

You also have a right to complain to the Information Regulator of South Africa by visiting info regulator.org.za.

16. CHILDREN

We will not knowingly solicit or collect personal information in respect of children (persons below the age of 18). Any person who provides their information to Lesaka Utilities represents to us that they are 18 years of age or older.

17. THIRD PARTY OPERATORS

We use external processors (“**Operators**”) for certain activities to assist with our operations. We reserve the right to change our Operators at any time without further notice to you, but we will ensure our Operators are bound by this Privacy Notice and our relevant policies, or similar terms providing the same or higher level of protection. Such external processing activities include, but are not limited to:

- IT systems and infrastructure;
- debt collection services;
- payment processors;
- posting and email infrastructure;
- record keeping infrastructure;
- credit reference agencies; and
- server hosts and data centres.

Before entering business relationships with our Operators, we go through due diligence checks with them.

18. COOKIES

We may place small text files called “cookies” on your device when you visit our website. Cookies do not hold personal information, but they do contain a personal identifier allowing us to affiliate your personal information with a certain device. Cookies serve useful purposes for you, including:

- remembering who you are as a user of our website to remember any preferences you may have selected on our website, such as saving your username and password, or settings (“**functional cookies**”);
- allowing our website to perform their essential functions. Without these cookies, some parts of our website would stop working (“**essential cookies**”). For example, data on error messages displayed to Users will be collected and the developer team will assess and solve it;
- monitoring how our website are performing, and how you interact with it to understand how to improve our website or Services (“**site analytics**”).

See our **Cookie Statement below** for more information on our use of cookies.

Your internet browser may accept cookies automatically and you can delete cookies manually. However, no longer accepting cookies or deleting them may prevent you from accessing certain aspects of our website where cookies are necessary.

As cookies are stored in the web browser used to access our website, to disable cookies you need to change the settings on that browser. Many websites use cookies and more information is available at: www.allaboutcookies.org.

19. **LINKS TO THIRD PARTY WEBSITES**

While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, or the security or privacy practices employed by other sites. We recommend that you always read the privacy and security statements on such sites.

20. **GOVERNING LAW**

This Privacy Notice is governed by South African law.

If any provision of this Privacy Notice is determined to be illegal, void or unenforceable due to applicable law or by order of court, it shall be deemed to be deleted and the continuation in full force and effect of the remaining provisions shall not be prejudiced.

21. **CHANGES TO THIS POLICY**

We may amend this Privacy Notice from time-to-time, and we will take reasonably practicable steps to inform you when changes are made. Without limiting the way we may inform you, we may notify you by email, or by posting an updated notice on our Website.

COOKIES STATEMENT

Here is a list of cookies that we use. We've listed them here so that you can choose whether you want to opt-out of cookies or not. To opt-out, change your cookies preferences on the main page of the website or on your browser.

Name	Type of Information	Expiration	Purpose
ession_id	Unique token	Sessional	Allows Shopify to store information about your session (e.g., referrer, landing page, etc)
_shopify_visit	No data held	30 minutes	Used by our website provider's internal stats tracker to record the number of visits.
_shopify_uniq	No data held	Next day	Counts the number of visits to a store by a single customer
_shopify_cart	Unique token	2 weeks	Stores information about the contents of your cart
_secure_session_id	Unique token	Sessional	Verify that the session is secure and has not been tampered with.
storefront_digest	Unique token	Indefinite	If the shop has a password, this is used to determine if the current visitor has access.