



PRIVACY POLICY

Octopi Distribution, a subsidiary of Octopi Group Holdings, registration number: 2009/021332/07 (hereinafter referred to as “Octopi Distribution”, “we”, “us” or “our”) is committed to ensuring the protection of the privacy of all visitors (“Visitors”) to our website at (the “Website”) as well as all persons (“Customers”) who have registered for an account with us (“Account”).

This privacy policy (“this Policy”) describes the ways in which we collect, store, use and protect your personal information. Throughout this Policy, we use the term “personal information” to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

You need to read and accept all the provisions in this Policy in order to use the Website and/or our services. By accepting this Policy, you are deemed to have read and agreed with all the provisions thereof. If you do not agree with anything in this Policy, then you may not use the Website and any of the services available therefrom.

1. CHANGES TO THIS POLICY

We may amend this Policy at any time by posting a revised version on our Website. The revised version will apply to Visitors with effect from the time we post it. If you are not happy with the revisions made, you should stop using the website in any way and may request us to deactivate your Account with us.

2. GENERAL INFORMATION ABOUT EVERYONE

2.1 Types of Information we collect

As a Visitor, you agree that we may electronically collect, store and use the following of your information:

2.1.1 Internet usage information, including your Internet Protocol address (“IP Address”), browsing habits, click patterns, unique user ID, version of browser software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the Website, and the dates and times that you visit the Website, paths taken, and time spent on sites and pages within the Website (“Usage Details”); and
2.1.2 Additional information you may provide on a voluntary basis, such as demographic information or information related to your favourite social networking site (e.g. the site name, address and description), or information relating to your participation in competitions, promotions, surveys, and/or additional services (“Optional Details”).

2.2 How we collect such information

2.2.1 Voluntarily provided by you: Optional Details may be submitted by you to us if you decide to upload or download certain content (or products) from the Website, enter competitions, take advantage of promotions, respond to surveys, register and subscribe for certain additional services, or otherwise use the optional features and functionality of the Website.

2.2.2 Automatically gathered via various technologies:

2.2.2.1 “Cookies” Information: When you access the Website, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer to collect certain Usage Details. We may use both session cookies (which disappear after you close your browser) and persistent cookies (which remain after you close your browser which can be removed manually) and may be used by your browser on subsequent visits to the Website. Please note that the use of cookies is standard on the internet and many major websites use them. Please review your web browser “Help” file to learn more about modifying your cookie settings.

2.2.2.2 Other tracking technology: When you access the Website or open one of our HTML emails, certain Usage Details may be automatically collected and recorded by us or our service providers from your system by using different types of tracking technology.

2.2.2.3 Web Beacons: Our Website may contain electronic image requests (called a “single-pixel gif” or “web beacon” request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Web beacons are typically 1-by-1 pixel files (so small that you would likely not realize that they are there), but their presence



can usually be seen within a browser by clicking on “View” and then on “Source.” We may also include web beacons in HTML-formatted newsletters that we send to opt-in subscribers in order to count how many newsletters have been read. Our web beacons do not collect, gather, monitor or share any personally identifiable information. They are just the technique we use to compile anonymous information about the Website and Service usage.

2.3 The purpose for which we collect this information

2.3.1 We may use any Optional Details provided by you for such purposes as indicated to you at the time you agree to provide such Optional Details.

2.3.2 We may use your Usage Details to (a) automatically provide you with the latest version of the Octopi Distribution application on your system; (b) remember your information so that you will not have to re-enter it during your visit or the next time you access the Website or Platform; (c) monitor aggregate Website usage metrics such as total number of visitors and pages accessed; (d) recommend such of our products to you which we believe you might like based on your browsing history; and (e) track your entries, submissions, and status in any promotions or other activities in connection with your usage of the Website. NOTE: Some of our business partners (e.g. advertisers) use their own cookies and/or widgets on our Website and we have no access to or control over such cookies or widgets. (Widgets are interactive mini-programs that run on our Website to provide specific services from another company (e.g. displaying the news, opinions, music, etc.) and these widgets may collect certain of your personal information (e.g. your email address). Cookies may also be set by the widget to enable it to function properly. Information collected by any such cookie or widget is governed by the privacy policy of the company that created it, and not by Octopi Distribution. This Policy covers the use of cookies by Octopi Distribution only and does not cover the use of cookies or widgets by any third party advertisers on the Website.

3. INFORMATION ABOUT CUSTOMERS

3.1 Types of information we collect about our Customers

If you are a registered Customer, you agree that we may also electronically collect, store and use the following of your information:

3.1.1 Name and surname, birth date, gender, location (i.e. country, province and city of residence), identity number or passport number (“Personal Details”);

3.1.2 If you are a legal entity, your full name, registration number, country of incorporation (“Corporate Details”), and the Personal Details of all your directors and/or office bearers;

3.1.3 e-mail address and, if provided by you, your mobile number (“Contact Details”);

3.1.4 Information relating to your transactional activity on the Website (“Transaction Details”);

3.1.5 Additional information you may provide on a voluntary basis, which could include demographic information or information related to your favourite website, activities, interests or your participation in competitions, promotions, surveys, and/or additional services (“Additional Details”); and

3.1.6 Information relating to third parties for whom you purchase products as gifts, such as such their name, physical address and/or contact number (“Third Party Details”).

3.2 How we collect information about Customers

Your Personal, Corporate and Contact Details will be provided by you during your registration as a Customer and/or thereafter by your actively updating or supplementing such details in your Account. Additional Details are provided by you on a voluntary basis either directly, or indirectly by means of you linking your Account to your other social networking profiles, such as your Facebook profile. Transaction Details are recorded by us as and when you buy or sell anything on the Website. Third Party Details are provided by you as and when you decide to order a product (including gift vouchers) as a gift for that third party.

3.3 The purposes for which we collect the information

We use the information that registered Customers provide (or that we collect) to operate, maintain, enhance, and provide all of the features of the Website and related services, and as may be necessary to comply with any relevant laws.

More specifically:

3.3.1 We use your Personal and Corporate Details to greet you when you access your Account, to manage and administer your use of the Website and fulfil our contractual obligations, including to verify your identity when transacting with us.

3.3.2 We use your Contact Details to verify your identity and to inform you of facts relating to your use of the Website. We may also use your Contact Details to inform you of competitions, promotions and special offers from us and/or our partners and/or affiliates, but only if you have given your prior consent to receiving such communications. For more information regarding these optional communications, see section 9 below.

3.3.3 We use your Transaction Details to keep transaction records and to comply with our other obligations and enforce our rights as per the T&C (if you are a Customer). We may also use these details to notify you



about products or special offers you may be interested in, but only if you have consented to receiving such communications from us (as explained in section 9) and to, on an aggregated anonymous basis, track sales, conduct market research and in so doing improve our product selection and services generally.

3.3.4 We may use any Additional Details provided by you to enhance and personalize your browsing experience on the Website and for such other purposes as may be indicated to you at the time you agree to provide such Additional Details.

3.3.5 We use the Third Party Details to be able to deliver the product you purchased for such third party to him/her and to contact such third party if need be to ensure delivery to him/her. We will not use such Third Party Details for any other purpose.

4. HOW WE PROTECT & STORE PERSONAL INFORMATION

4.1 Octopi Distribution website. We store the personal information of our Customers and Visitors on our servers in South Africa, but we control all such personal information from South Africa. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfil their job responsibilities.

4.2 You should not divulge your Account password to anyone. We will never ask you for your password in an unsolicited telephone call or e-mail. **YOU ARE RESPONSIBLE FOR MAINTAINING THE SECRECY OF YOUR UNIQUE PASSWORD AND ACCOUNT INFORMATION AT ALL TIMES.**

4.3 If you are a legal entity and not an individual, we will liaise only with your named contact or alternative contact provided by your named contact. It is your responsibility to let us know of any changes to your named contact.

5. HOW WE SHARE PERSONAL INFORMATION WITH OTHERS

5.1 We may share the personal information of each of our Visitors and Customers with –

5.1.1 our other business divisions, or other companies within the group of companies to which we belong, being the Octopi Distribution group of companies (which includes companies registered in countries other than South Africa) so as to provide joint content and services like registration, transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services and communications. Members of our corporate family will only use this information to send you marketing communications if you have requested their services.

5.1.2 Law enforcement, government officials, fraud detection agencies or other third parties when (a) we are compelled to do so by a subpoena, court order or similar legal procedure; or (b) we need to do so to comply with any law; or (c) we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our User Agreement and/or Merchant Agreement.

5.1.3 our service providers under contract who help with parts of our business operations (fraud prevention, marketing, technology services etc). However, our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

5.1.4 Other third parties, but only with your consent or direction to do so.

5.2 Also note that if Octopi Distribution should sell, transfer or close its business, or undergo a merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation, then Octopi Distribution shall be entitled to transfer, sell or assign any or all information collected via the Website (including your personal information) to one or more relevant third parties, but only to be used by them in accordance with the provisions of this Privacy Policy.

6. HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

If you would like to review or change the details that you have supplied us with at any time you can either amend your details directly by going to your 'Account' section in the top right corner and choosing to Update your profile or by contacting us at info@octopidistribution.com.

7. NON-PERSONAL INFORMATION

Notwithstanding anything contained in this Policy regarding your information, the following information is not regarded as personal information for purposes of this Policy:

7.1 Permanently de-identified information that does not relate and/or cannot be traced back to you specifically. We may compile, use, share and otherwise process such information as we deem fit.

7.2 Non-personal statistical information collected and compiled by us. We own and retain all rights in such information

7.3 Information, which you have provided voluntarily in an open, public environment or forum including (without limitation) any blog, chat room, albums, community, classifieds or discussion board. Because the information has been disclosed in a public forum, it is no longer confidential and does not constitute



personal information subject to protection under this Policy. Since such public environments are accessible by third parties, it is possible that third parties may collect and collate and use such information for their own purposes and you should accordingly be careful when deciding to share any of your personal information in such public environments

8. YOU CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION

By accepting this Policy, you consent to our collection, storage, processing and disclosure of your personal information as described in this Policy. Should you terminate your registration with us and/or close your Account, you consent to our retention of the information we have already collected from you for record-keeping purposes only.

9. OPTIONAL CONSENT TO MARKETING & SERVICE COMMUNICATIONS

Although you cannot opt out of receiving communications we need to send you relating directly to your Website purchases, you can opt out of receiving various other types of communications from us, being as follows:

9.1 sporadic alerts about exclusive discounts, special offers, sales and competitions.

9.2 regular newsletters to inform you about offers, hot products and other things that may be of interest to you (based on your selected interests and previous purchases) or to our Customers generally.

9.3 Service communications concerning activity on your Account such as to notify you about a voucher you have received from us, or to remind you of unordered items in your online basket or vouchers approaching expiry, which you haven't yet redeemed.

You can opt out of certain service mails and notify us about your marketing communication preferences here. You can also opt out on a specific type of communication by following the unsubscribe link at the bottom of each email.

While we do our best to act on your preferences as soon as we can, please be aware that it may take up to 14 days for changes to your preferences concerning newsletters or service emails to take effect.

10. HOW YOU CAN CONTACT US ABOUT PRIVACY QUESTIONS

If you have questions or concerns regarding this Policy, you should contact us at info@octopidistribution.com.