

PRIVACY POLICY

MY DOUGH ACADEMY (PTY)LTD

(Registration number: 2020 / 066527 / 07)

(hereinafter "My Dough")



1. INTRODUCTION

1.1 This Privacy Policy applies to all users of the My Dough Platform, related mobi-sites and software applications, collectively referred to as “our Platforms and/or the My Dough Platform”, which are used to access our products and services.

1.2 This Privacy Policy (“Policy”) governs the collection, management and disclosure of personal information that My Dough (“We”, “Us” or “Our”) collects through the My Dough Platform (“the Platform”).

1.3 We respect your rights to responsible management of your personal information under the Protection of Personal Information Act 4 of 2013 (“the Act”).

1.4 For the purposes of this Policy, personal information is defined in accordance with the definition provided in the Act. Use of the Platform is subject to this Policy.

1.5 By using the My Dough Platform, you (“You” or “Your” may be used interchangeably with “User”) signify consent to processing of personal information in accordance with this Policy.

1.6 My Dough may amend this Policy at any time. All amended terms shall be effective immediately upon the posting of the revised policy and any subsequent activity in relation to the My Dough Platform shall be governed by such amended terms and conditions of usage.

1.7 If the User does not agree with any term in this Policy, please do not use the My Dough Platform or submit any personally identifiable information through the My Dough Platform. You are not required to provide any Personal Information on the public areas of the My Dough Platform. However, you may choose to do so by completing online forms on various sections of the My Dough Platform or otherwise made available through the My Dough Platform.

1.8 It is important that you read this Privacy Policy together with our other terms and conditions, privacy notices or policies we may provide from time to time when we collect or use your Personal Information.

1.9 Further, please pay special attention to the clauses in this Privacy Policy that appear in similar text and style (i.e. **bold**) which:

- May limit the risk or liability of My Dough or a third party;

- May create risk or liability for the user;
- May compel the user to indemnify My Dough or a third party; and/or
- Serves as an acknowledgement, by the user, of a fact.

1.10 We respect your privacy and take the protection of Personal Information very seriously.

1.11 In this Privacy Policy, the terms –

1.11.1 “Personal Information” and “Special Personal Information” shall bear the same meanings as set out in POPI.

1.11.2 “we”, “us” or “our” refers to My Dough

1.11.3 “you” and “your” refers to every person that accesses or uses our Platforms also referred to as a user.

1.11.4 “registered user(s)” refers to anyone registered on our Platforms and has provided us with a unique username and password as well as other Personal Information in order to use our services to order food on our Platforms.

1.11.5 “process/processing” shall bear the same meanings as set out in POPI

IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY, PLEASE DO NOT USE THE PLATFORM.

2. **PERSONAL INFORMATION AND USE**

2.1 My Dough processes Personal Information in a manner that is reasonable, adequate, relevant, non-excessive and purpose specific. In order for users to access and use our Platforms we collect and process some Personal Information.

2.2 My Dough and/or its authorised agents and/or its representatives may collect, process, and store certain Personal Information from you in connection with your use of the My Dough Platform provided to you by My Dough.

2.3 Users' Personal Information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

2.4 This Privacy Policy meets the requirements of notification and collection as per the Act.

2.5 For the purpose of this Privacy Policy, Personal Information is defined in accordance with the definition in the Act. Generally, such information is information that can be used to personally identify You. In particular, however, My Dough may collect information from Users, for the purpose of allowing you access to the Platform, such as:

2.5.1 First name and surname;

2.5.2 telephone/cellphone number;

2.5.3 email address;

2.5.4 company name;

2.5.5 details of responses to your enquiries and any online communications between us and you;

2.5.6 any additional information relating to you that you provide to us directly through the My Dough Platform or indirectly through use of our the My Dough Platform or online presence; and

2.5.7 any unsolicited information provided to us that we could have otherwise lawfully collected.

2.6 We collect Personal Information from the following persons:

2.6.1 natural persons over 18,

2.6.2 juristic persons duly represented,

2.6.3 the My Dough Platform visitors, and

2.6.4 people who send enquiries or requests to our contact email address and/or online forms.

2.7 Should the information we collect personally identify you, or you are reasonably identifiable from it, the information will be considered Personal Information.

- 2.8 You consent to the receipt of direct marketing communications regarding all future business activities and news. Consent to receive direct marketing communications can be revoked at any time by contacting Us via email at admin@mydough.co.za
- 2.9 My Dough uses online forms to collect Personal Information. By submitting your Personal Information, you expressly consent to the collection, processing, sharing and storage of your Personal Information as defined in this Policy.
- 2.10 My Dough may also automatically collect and store non-personally identifiable information related to your use of the My Dough Platform. Non-personally identifiable information may include Personal Information that has been aggregated.
- 2.11 Your Personal Information is used for the following:
- 2.11.1 to enable access and ease of use of the My Dough Platform;
 - 2.11.2 to assess the performance of the My Dough Platform and to improve the operation of the My Dough Platform;
 - 2.11.3 to send you information on relevant services, seminars, training and events;
 - 2.11.4 to process and respond to any complaint made by you;
 - 2.11.5 to engage in electronic communications and transactions with you;
 - 2.11.6 to update our records;
 - 2.11.7 to keep your contact details up to date;
 - 2.11.8 to compile anonymous statistical data and analysis for use internally or with third parties;
 - 2.11.9 to resolve disputes and troubleshoot problems;
 - 2.11.10 to provide you with marketing material or marketing services in a manner that complies with the Consumer Protection Act 68 of 2008 and the Protection of Personal Information Act 4 of 2013; and
 - 2.11.11 to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country (or political subdivision of a country).

- 2.12 We use cookies or other tracking technologies to collect information such as the pages you visit or the information you request. The information collected is kept confidential. The use of tracking technologies enables us to keep track of your use of the My Dough Platform, so that we may provide you with further information.
- 2.13 Personal Information is automatically collected in relation to your visit to the My Dough Platform, such information includes but is not limited to:
- 2.13.1 your browser type and version,
 - 2.13.2 your device type,
 - 2.13.3 your operating system,
 - 2.13.4 your IP address, and
 - 2.13.5 your geo-location.
- 2.14 We are also able to use the information collected to improve our internal business processes. We research our Users' habits, measure traffic patterns in the aggregate, analyse trends, administer the My Dough Platform, track Users' movements and gather broad demographic information.
- 2.15 My Dough Platform hosting agents and/or service providers may automatically log Your "IP address" which is a unique identifier for your computer and/or other access device. Such information collected is for aggregate purposes only and cannot be used to identify you personally.

3. **INFORMATION FROM USING OUR PLATFORM**

- 3.1 When you access our Platforms, but are not a registered user, My Dough may process some of your Personal Information. Depending on how you access and use our Platforms, we may receive:
- 3.1.1 log information, through online identifiers, including information on how, when and for how long you use our Platforms and other services, the content you view and search queries you submit.
 - 3.1.2 information about the equipment you use to access or use our Platforms, including the type of device you are using, how you access our Platforms, your browser or operating system and your Internet Protocol address.

3.1.3 the geographic location from which you accessed our Platforms, including your device's global positioning system signal and information about nearby wifi networks and cell towers. We get this information when you use location-enabled services.

3.1.4 other information about you from third parties, such as social media.

4. CONSENT TO PROCESS PERSONAL INFORMATION

4.1 By using the My Dough Platform, you represent that you are of the age of 18 or older. This consent is effective on access and use of the My Dough Platform .

4.2 You understand that such consent to the processing of your Personal Information by My Dough pertains to access and use of the My Dough Platform. Processing shall include the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as blocking, degradation, erasure or destruction of information.

4.3 You expressly consent to My Dough retaining your Personal Information once your relationship with My Dough has been terminated for: aggregate, statistical and reporting purposes.

4.4 In the event that you wish to revoke all consent pertaining to your Personal Information and you would like My Dough to remove and/or delete your Personal Information entirely, you must notify My Dough via email on admin@mydough.co.za

4.5 Personal Information may be processed by My Dough in the country where it was collected.

5. HANDLING OF PERSONAL INFORMATION

5.1 My Dough endeavours to comply with all laws and regulations applicable to and pertaining to information and communications privacy including, but not limited to, the 1996 South African Constitution and the Protection of Personal Information Act 4 of 2013 ("the Act"). My Dough applies the principles of protection of Personal Information under the Act as well as further legislation referred to in the Act.

- 5.2 You may request access to any Personal Information we hold about you at any time by contacting us via email at admin@mydough.co.za
- 5.3 My Dough seeks to ensure the quality, accuracy and confidentiality of Personal Information in its possession.
- 5.4 The User has the right to correct and update Personal Information as well as to revoke consent to the processing of Personal Information by My Dough .The User, however, understands that My Dough requires Personal Information to allow access to the My Dough Platform and should the User decide to revoke consent My Dough may not be able to provide the User with access to the My Dough Platform.
- 5.5 There may be instances where we cannot grant you access to the Personal Information we hold. We may need to refuse access if granting access would interfere with the privacy of others, commercial information of a third party or if it would result in a breach of confidentiality. Should this be the case, we will give You written reasons for any refusal.
- 5.6 My Dough will take all reasonable measures in order to ensure your Personal Information is appropriately safeguarded, these precautions include, but are not limited to: the use of a sufficiently secure server, the installation of web security tools, regular the My Dough Platform and file backups, as well as additional the My Dough Platform updates.
- 5.7 Should an unauthorised person/s gain access to your Personal Information My Dough will contact you within a reasonable time to inform you of the security breach.
- 5.8 As the My Dough Platform and Services are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any Personal Information or other information which you transmit to Us online is transmitted at your own risk.
- 5.9 My Dough will not sell, exchange or transfer your Personal Information to any third party except as required in the provision of any of the My Dough services and in accordance with the consents provided by you.

5.10 My Dough will make amendments and/or updates to this Privacy Policy on occasion. Amendments made to this Policy shall become immediately effective. We encourage you to periodically review this Privacy Policy to keep informed about how we are protecting your Personal Information.

5.11 Your continued use of the My Dough Platform is evidence of your acceptance of this Privacy Policy and any updates made to it.

5.12 The My Dough Platform may contain links to other the My Dough Platforms. My Dough is not responsible for the privacy practices of third party sites.

6. **RETENTION AND RESTRICTION OF RECORDS**

6.1 We keep your Personal Information for as long as:

6.1.1 we need it to provide our Platforms, products or services to you.

6.1.2 it is required or allowed by law and is in line with our internal retention policies.

6.1.3 it is necessary to uphold the contract between you and us.

6.1.4 you have agreed to us keeping your Personal Information subject to your request for us to stop processing your Personal Information.

6.2 We will retain your Personal Information for as long as is necessary to achieve the purpose for which this information was collected or subsequently processed. If your Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires but we will stop using it for the purpose with a shorter period once that period expires.

6.3 By accessing and using the Platform, you consent to us retaining records of your Personal Information for no longer than may be necessary to achieve the purpose for which the information was initially collected or subsequently processed.

7. **USER TRACKING AND COOKIES**

7.1 When you access and use our Platforms, we may use various technological tools to improve your experience on our the My Dough Platforms through the use of cookies and/or user tracking.

7.2 Cookies are small text files placed on the device that you use to access our Platforms. These files do not contain your Personal Information but allow us to associate you with a particular device. The My Dough Platforms use cookies to:

7.2.1 Make our Platforms more user friendly.

7.2.2 Personalise your interactions with our Platforms, tailor our services and Platforms to your interests and needs, and ensure they work on your device.

7.2.3 Provide advertising that is relevant to you, limit the number of times you see the same advertisement and measure the effectiveness of the advertisements on our Platforms and other the My Dough Platforms, based on your online activities such as the tMy Dough Platforms and apps you use or content you view, and information we have about you.

7.2.4 Send Opt-In marketing communication if you are not a registered user.

7.3 We will not use your Personal Information for any other purpose without your permission.

7.4 By accessing and using the Platform, you consent to our use of cookies.

8. **WHO ELSE GETS TO PROCESS YOUR PERSONAL INFORMATION**

8.1 We do not sell your personal information to third parties for their marketing or any other purposes.

8.2 We may provide or make your Personal Information available to:

8.2.1 our employees, the staff of the companies in the My Dough or Thamani Group and/or third party service providers in order to enable them to assist us to interact with you via our Platforms ;

8.2.2 law enforcement, government officials, fraud detection agencies or other third parties when the disclosure of Personal Information is necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability or financial loss, to report or support the investigation into suspected illegal activity;

8.2.3 third parties (such as a potential purchaser and its professional advisors) in the event of any reorganisation, merger, consolation, sale, joint venture, or other disposition of any or all of our assets;

8.2.4 our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, public relations, technology services etc). However, our contracts dictate that these service providers may only use your Personal Information in connection with the services they perform for us and not for their own benefit or any other purpose, and must treat such information as confidential information;

9. **SENDING YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA**

9.1 We may transfer certain Personal Information outside the geographic borders of South Africa to service providers for purposes set out above eg for data storage and back-up purposes to ensure the integrity of our systems. When we transfer your Personal Information outside of the geographic borders of South Africa, we will ensure that we do so in accordance with the requirements for lawful transfer outside of South Africa as set out in POPI.

9.2 By accessing and using our Platforms, you consent to us transferring your Personal Information outside of South Africa as set out in POPI

10. **SECURING YOUR PERSONAL INFORMATION**

10.1 We secure the integrity and confidentiality of your Personal Information in our possession or under our control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of Personal Information; and unlawful access to or processing of Personal Information.

10.2 In order to implement and maintain such measures, we have in place policies, controls and related processes, which are reviewed and updated on a regular basis. Our policies, controls and procedures cover for example:

10.2.1 physical, technical and network security;

10.2.2 access controls and monitoring of access;

- 10.2.3 secure storage, destruction and encryption of records of Personal Information;
- 10.2.4 Personal Information breach reporting and remediation; and
- 10.2.5 by way of written agreements, imposition of security and confidentiality obligations on third parties (based within or outside the borders of South Africa) who process Personal Information as part of rendering services.

10.3 Should you disclose your Personal Information to any third party other than My Dough , My Dough shall not be liable for any loss or damage arising or suffered by you as a result of the disclosure of such Personal Information to any third party. This is because we do not regulate or control how that third party uses your Personal Information. You should always ensure that you read the privacy policy of any third party.

11. **KNOW YOUR RIGHTS**

11.1 Having provided adequate proof of your identity, you have the right to:

- 11.1.1 view, correct and/or amend your Personal Information we process. Please note that as a registered user, you can do this through your user account for the Personal Information reflected therein.
- 11.1.2 request a record or description of your Personal Information. My Dough may charge a fee in order to provide you with this record of your Personal Information. Where requests to access and amend your Personal Information are manifestly unfounded, excessive or repetitive My Dough may charge an additional administrative fee or refuse the request.
- 11.1.3 request to have your Personal Information corrected, destroyed or deleted. Please note that you can stop being a registered user by cancelling your account. In this instance My Dough will retain your Personal Information subject to any legislative requirement and/or our internal retention policy.
- 11.1.4 us complying with your requests upon receipt unless we have credible reason why we cannot comply.

- 11.1.5 us indicating where, if we cannot agree whether to correct or delete your Personal Information as requested, that a correction or deletion was requested but was not made.
 - 11.1.6 inform you if reasonably practicable, should we change your Personal Information and this has an impact on decisions about you.
 - 11.1.7 notify you of the action taken by us because of your request.
 - 11.1.8 notify you of unauthorised access to your Personal Information.
 - 11.1.9 provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable notice and request.
 - 11.1.10 Submit a complaint to the Information Regulator.
- 11.2 As a registered user, you can exercise all your rights set out above in terms of POPIA.
- 11.3 As any other user, you can exercise all your rights as set out above by referring to our process set out in our PAIA manual.

12. **HOW TO LODGE A COMPLAINT WITH THE INFORMATION REGULATOR**

- 12.1 If you have any complaints about this Privacy Policy or our compliance with this Privacy Policy you can lodge a complaint with the Information Regulator.
 - 12.2 The contact details of the Information Regulator are available on its the My Dough Platform at: <https://justice.gov.za/inforeg/>
 - 12.3 This version of the Privacy Policy replaces any preceding privacy policy provisions on our the My Dough Platform. We may occasionally update this Privacy Policy. When you use our Platforms the version of the Privacy Policy posted on this page applies to you.
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