



ALLEY ROADS REWARDS PRIVACY POLICY

This privacy policy (the “**Privacy Policy**”) explains how we collect, retain, use and disclose your personal information, as is required by the Protection of Personal Information Act No. 4 of 2013, as amended from time to time.

At Alley Roads, trading as ALLEY REWARDS, we are committed to protecting your privacy and to ensuring that your personal information is collected, retained, used and disclosed properly, lawfully and transparently.

1. **WHO WE ARE**

ALLEY Assist Services (“**we**”, “**our**” or “**us**”) is a South African company, with registration number **2013/097721/07**, and is the owner and operator of the application, interface, platform, website, loyalty programme, benefits and services distributed or provided through <https://rewards.alley.co.za> (collectively referred to as “**ALLEY REWARDS**”).

2. **WHAT INFORMATION WE COLLECT**

- 2.1. We collect and process your personal information mainly to provide you with access to ALLEY REWARDS, to manage your use of ALLEY REWARDS, to provide and administer your ALLEY REWARDS benefits, ALLEY REWARDS services, the ALLEY REWARDS loyalty programme and your ALLEY REWARDS subscription, and to help us improve our offerings to you. It is our policy to respect the confidentiality of your personal information.
- 2.2. The type of information we collect will depend on the purpose for which it was collected and used. We will only collect information, which is adequate, relevant and not excessive in relation to the purpose for which the information had been collected.
- 2.3. We collect information directly from you, for example when you use ALLEY REWARDS or when you contact us.
- 2.4. The supply of your personal information is mandatory to access ALLEY REWARDS and to receive the ALLEY REWARDS benefits, and to enable us to effectively provide the ALLEY REWARDS services to you.
- 2.5. Failure to provide your personal information, as reasonably required, will effectively prevent you from accessing ALLEY REWARDS, from receiving the ALLEY REWARDS benefits or receiving the ALLEY REWARDS services.

3. **HOW WE USE YOUR PERSONAL INFORMATION**

- 3.1. We will use your personal information only for the purposes for which it was collected.
- 3.2. In providing you with access to ALLEY REWARDS, the ALLEY REWARDS benefits and the ALLEY REWARDS services, we may also provide your personal information to third parties who have been contracted by us to provide administrative, compliance, financial, insurance, technology, benefits or legal services.
- 3.3. We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by applicable law (for example; to protect our legitimate legal interests).
- 3.4. We shall not retain your personal information for any longer than is necessary.



4. **COOKIES, OTHER SERVICES AND NEWSLETTERS**

- 4.1. Given our aim to provide you with personal and effective ALLEY REWARDS benefits and ALLEY REWARDS services, we would like to use your personal information to keep you informed about your ALLEY REWARDS benefits, other services, updates to our terms and conditions, updates to this Privacy Policy, updates or amendments to ALLEY REWARDS and to issue our monthly newsletter.
- 4.2. Please email us at alleyrewards@directrewards.co.za if you do not wish to receive such updates and information. You may opt out, at any time, if you do not wish to receive any further communications of this nature.
- 4.3. ALLEY REWARDS uses Google AdWords Remarketing (“AdWords”) to advertise ALLEY REWARDS across the Internet.
- 4.4. AdWords will display relevant ads tailored to you based on the parts of the ALLEY REWARDS website you have viewed by placing a cookie on your machine.
- 4.5. THIS COOKIE DOES NOT IN ANY WAY IDENTIFY YOU OR GIVE ACCESS TO YOUR COMPUTER. The cookie is used to say, “This person visited this page, so show them ads relating to that page”.
- 4.6. AdWords allows ALLEY REWARDS to tailor our marketing campaigns to better suit your needs and only display ads that are relevant to you.
- 4.7. If you do not wish to participate in the ALLEY REWARDS AdWords campaign, you may opt out by visiting Google’s Ads Preferences Manager.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

- 5.1. We may share your personal information with, and obtain information about you from:
 - 5.1.1. third parties for the purposes listed above, for example fraud prevention agencies and law enforcement agencies;
 - 5.1.2. contracted third party suppliers/specialist advisors; and
 - 5.1.3. other third parties from whom you have chosen to receive marketing information.
- 5.2. We may also disclose your personal information:
 - 5.2.1. where we have a duty or a right to disclose such personal information in terms of applicable law or industry codes;
 - 5.2.2. where we believe it is necessary to protect our rights; and where we are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information.
- 5.3. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.
- 5.4. We aim to safeguard the privacy of your personal information, and we hold personal information in a combination of secure computer storage facilities and other records.
- 5.5. We have security policies and procedures in place, which cover:
 - 5.5.1. physical security;
 - 5.5.2. computer and network security;
 - 5.5.3. access to personal information;
 - 5.5.4. secure communications;
 - 5.5.5. security in contracting out activities or functions;
 - 5.5.6. retention and disposal of personal information;
 - 5.5.7. acceptable usage of personal information;
 - 5.5.8. monitoring access and usage of personal information; and
 - 5.5.9. investigating and reacting to security incidents.

- 5.6. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that all personal information, for which we are responsible for, is kept secure.
- 5.7. We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone that we pass your personal information to agrees to treat your information with the same or similar level of protection as that which we have provided to you in terms of this Privacy Policy.

6. **YOUR RIGHTS**

- 6.1. You have the right to request a copy of your personal information in our possession. You may contact us at the email and addresses listed below and specify what personal information you would like to receive. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 6.2. Please note that we are allowed to charge a reasonable fee for such access, however, that we have decided to grant such access free of charge.
- 6.3. You have a right, at any time and on reasonable grounds, to object to the processing of your personal information, at which time we shall immediately cease doing so and at which time your access to ALLEY REWARDS shall be terminated.
- 6.4. We endeavour to ensure that the personal information we hold is accurate and up to date. You have the right to request us to update, correct or delete your personal information. You may do this by contacting us at the email and addresses provided below.
- 6.5. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.
- 6.6. We would appreciate it if you would keep your personal information accurate. Please notify us at the numbers and addresses below when your personal information changes.

7. **CHANGES TO THIS PRIVACY POLICY**

Our Privacy Policy will be reviewed from time to time to consider current legislation and to ensure that it remains appropriate to current circumstances. Please check our website periodically to inform yourself of any changes to our Privacy Policy.

8. **HOW TO CONTACT ALLEY REWARDS**

Please contact us at the following email and addresses if you wish to enquire about any aspect of this Privacy Policy, exercise any right or if you wish to update your personal information:

<u>Physical Address:</u>	21D Polo Crescent, Woodmead Office Park, Woodmead, South Africa
<u>Postal Address:</u>	21D Polo Crescent, Woodmead Office Park, Woodmead, South Africa
<u>Contact Number:</u>	+2787 985 0470
<u>Email Address:</u>	info@alleyroads.co.za ; and
<u>Website:</u>	https://alleyroads.co.za