

#### YEP PRIVACY POLICY

THIS PRIVACY POLICY APPLIES TO ALL YEP PRODUCTS AND/OR SERVICES INCLUDING PORTAL, PLAFORMS AND ELECTRONIC COMMUNICATIONS ENABLED FOR USE BY USERS, CUSTOMERS OR VISTORS TO OUR PORTAL AND/OR PLATFORMS

#### 1. OUR COMMITMENT: RESPECTING AND PROTECTING YOUR PRIVACY

1.1. Your privacy is important to us. YEP respects and takes steps to protect the privacy of its visitors and Customers. We strive to take reasonable care of information we may receive from you.

## 2. OUR PRIVACY STATEMENT

- 2.1. Recognition of the right to privacy including the right to protection against the unlawful collection, retention, dissemination and use of personal information is our commitment to you as our Customer, visitor and/or user (the "Users") of our Website and/or Platforms. Our privacy statement is aligned to the principles of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013), ("POPIA") and you are referred to section 1 of the aforesaid Act, ("Definitions") to appraise yourself with the meaning of all wording in capital letters or our YEP Terms https://yep.co.za/assets/pdf/Yep-Product-Terms.pdf
- 2.2. YEP in its role as a 'Responsible Party' appreciates your visit on our Website and interest in our company and our Product and/or Service offering. To ensure a high level of transparency and security, our privacy statement as set forth below will inform you about the nature, scope, and purpose of any collection, use and processing of Personal Information transmitted to us via our Website or recorded by us.



#### 2.3. THE SCOPE OF THIS PRIVACY POLICY

2.4. This Privacy Policy addresses the privacy of Users of YEP Portal (https://yep.co.za), Platforms (mobile apps, web app, website and social media) and/or Electronic Communication (communication facilities enabled for communication between YEP and Users being, SMS, Email, Chat Messaging and Telephone). This Privacy Policy further identifies the type of data and information YEP Portal, Platforms and Electronic Communication collects from Users, how we use, process and disclose it, and the steps we take to protect privacy of your Personal Information.

#### 3. WHAT INFORMATION WE COLLECT AND HOW WE USE IT

## 3.1. Information We Collect:

- 3.1.1. YEP collects Personal Information when you (a) register on our Portal and/or Platform; (b) communicate with us via Electronic Communication; or (c), when you use YEP's Products and/or Services; (d) visit YEP Portal and/or Platforms or the pages of certain YEP's business partners, Affiliates, Third Party Service Provider and/or Third Party Suppliers; and/or (e) enter promotions.
- 3.1.2. We may, additionally, track non-personal information about your visit, including the domain name and the name of the Web page from which you entered YEP Portal and/or Platforms, how much time you spend on each of our pages, and the IP address associated with your computer. We use this information to improve the performance and operation of our YEP Portal and Platforms.
- 3.1.3. When you register, we ask for Personal Information such as your name, e-mail address, birth date, gender, area code, occupation, industry, and personal interests. For registration to our Platforms or subscription to our Products and/or Services, we may also ask for your address, Identity Number, and credit card information. Once you register with YEP's Platforms and/or subscribe to any of YEP's Products and/or Services, you are not anonymous to us and we protect your Personal Information (see Security below including our Use Rules and Security Policy).

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- 3.1.4. YEP collects information about your transactions with us and with some of our business partners, Affiliates, Third Party Service Providers, Third Party Suppliers, including information about your use of our Platforms, Products and/or Services that we offer.
- 3.1.5. YEP automatically receives and records information on its server logs from your browser, including your IP address, YEP's cookie information, and the page you request.
- 3.1.6. YEP uses information for the following general purposes: (a) to customize the advertising and content you see; (b) fulfil your requests for Products and/or Services; (c) improve our Products and/or Services and (d) contact you, conduct research, and provide statistical reporting for internal and external clients and Customers.

#### 4. YOUR ABILITY TO EDIT YOUR ACCOUNT INFORMATION AND PREFERENCES

4.1. You can edit your YEP Account in the YEP Portal and/or Platforms, including your marketing preferences, at any time. New categories of marketing communications may be added to the marketing preferences page from time to time. Users who visit this page can 'opt out' of receiving future marketing communications from these new categories or they can 'unsubscribe' by following instructions contained in the messages they receive. We reserve the right to send you certain communications relating to our Platform Products and/or Services, such as Product or Service announcements and administrative messages that are considered part of your YEP Account, without offering you the opportunity to 'opt-out' of receiving them or 'unsubscribe'.

### 5. PLATFORMS/PORTAL

5.1. Our YEP Portal and Platform makes reference to and include links to other third party platforms, portals, apps and/or websites. As a rule, these are identified by stating the portal, platform, apps and website type and respective third-party, Internet address or the company/product logo in such portal, platform apps and/or website. YEP has no influence whatsoever on the contents and design of third party platforms, portal, apps, websites of other providers linked to YEP Portal and/or Platforms. By referencing/linking these external portals, platforms and/or apps, websites we do not adopt nor approve their contents as our own.

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#### 6. COOKIES AND RELATED TECHNOLOGIES

- 6.1. A cookie is a small file that is stored on the hard drive of your computer, ready for future access when you return to our site. We may use cookies to tailor and improve the content we deliver to you while you are on our site. The cookies do not contain or capture any Personal Information. You can configure your computer's browser to alert you when a site is attempting to send you a cookie, and then you can accept or refuse the cookie. Your decision to refuse cookies from YEP Portal and/or Platforms will not prevent you from using our YEP Portal and/or Platforms but may limit your ability to take advantage of some of our advanced features.
- 6.2. We may use various technologies to collect and store information when you interact with us via our YEP portal and/or platforms. Please refer to our cookie policy available at <a href="https://yep.co.za/assets/pdf/Yep-Product-Terms.pdf">https://yep.co.za/assets/pdf/Yep-Product-Terms.pdf</a> for more information.
- 6.3. On some of the pages on our YEP Portal and/or Platforms, we may also use small bits of computer code called "one-pixel gifs," clear gifs," or "Web beacons" embedded in Web pages to monitor the activity on our Portal and/or Platforms. Again, the technology does not capture or contain any Personal Information.

## 7. CHILDREN

7.1. The offerings, Product and/or Services on our YEP Portal and/or Platforms are not directed at children. We therefore assume that we will not become aware of any Personal Information pertaining to children.



### 8. THIRD PARTY ADVERTISERS AND EXTERNAL LINKS

8.1. The YEP Portal and some YEP's Platforms may accept advertisements from third-party advertisers or provide links to external portal, platforms or web sites. Please check the privacy policy of these advertisers and sites for information regarding their collection of information and use of cookies. We are not responsible for the content or privacy practices of other web sites. Our business partners, Affiliates, third Third Party Service Providers, Third Party Suppliers or advertisers may use third parties to serve or present the ads that appear on our YEP Portal and/or Platforms. These third parties may place cookies on your browser when you visit our YEP Portal and/or Platforms. Any third-party cookies are subject to the privacy policy of the company placing them.

#### 9. INFORMATION WE DISCLOSE TO THIRD PARTIES

- 9.1. We may use aggregated information concerning how visitors use our Web site and share such information with third parties in order to improve our Portal, Platforms and/or Electronic Communications and to help us attract advertisers and listings. For example, we may share how many individuals visited our Portal and/or Platforms and on average how long they stayed on each page. Such use and sharing of aggregated information will not reveal any of your personal information to third parties.
- 9.2. YEP does not rent, sell, disclose or share Personal Information about you with other people or non-affiliated companies except to provide Products or Services you have requested, when we have your permission, or under the following circumstances:
- 9.2.1. We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- 9.2.2. We believe it is necessary to share Personal Information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Portal, Platforms and/or Electronic Communication's terms of use, or as otherwise required by law;

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- 9.2.3. We transfer your Personal Information if YEP is acquired by or merged with another company. In this event, YEP will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.
- 9.3. YEP does not provide any Personal Information to the advertiser when you interact with or view an ad.

#### 10. SECURITY

10.1. YEP takes your security seriously and takes reasonable steps to protect your Personal Information. No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any Personal Information and/or information you transmit to us and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our YEP Portal, Platforms and/or systems. However, please note that this is not a guarantee that such Personal Information or information may not be accessed, disclosed, altered or destroyed by breach of any firewalls or security server software we may employ. YEP continues to evaluate and implement enhancements in security technology and practices, however we can only take steps to help reduce the risks of unauthorized access. YEP has taken the following steps in this regard:

# 10.1.1. Secure Socket Layer (SSL):

YEP uses SSL (Secure Socket Layer) encryption when transmitting certain kinds of information, such as registration information or payment information. An icon resembling a padlock is displayed on the bottom of most browsers window during SSL transactions that involve credit cards and other forms of payment. Any time YEP asks you for a credit card number on YEP for payment or for verification purposes, it will be SSL encrypted. The information you provide will be stored securely on our servers. Once you choose to store or enter your credit card number on YEP, it will not be displayed back to you in its entirety when you retrieve or edit it in the future. Instead of the entire number, you will only see asterisks and either the first four digits or the last four digits of your number.

## 10.1.2. Secure Storage

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YEP maintains reasonable physical, electronic, and procedural safeguards that comply with South African laws and regulations to protect your Personal Information.

## 10.1.3. Vendors and Business Partners

YEP works with businesses to protect the security and privacy of User information including Personal Information.

## 10.1.4. Employee and Contractor Access to Information

YEP limits access to Personal Information about you to those employees who we reasonably believe need to come into contact with that information to provide products or services to you or in order to do their jobs.

# 10.1.5. Education and Training for Employees

YEP has implemented a company-wide education and training program about security that is required of every YEP employee.

If YEP learns of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using this Web site or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of this site. YEP may post a notice on our Web site if a security breach occurs. If this happens, you will need a Web browser enabling you to view the YEP Web site. YEP may also send an e-mail to you at the e-mail address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving an electronic notice) you should notify us at info@support.co.za.

If you believe your YEP Portal Account or any Customer Identifiers enabled for access to and use of our Products and/or Services has been compromised, please report the incident using our contact form. In the event that you believe that your personal safety is at risk or if you believe that you may be the victim of identity theft or other illegal conduct, please contact the appropriate South Africa law enforcement agencies directly.

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#### 11. LEGAL BASIS FOR PROCESSING

11.1. We Process Personal Information about you as a Responsible Party as described in this Privacy Statement, where such Processing is in our legitimate interests and in compliance with your privacy interests or fundamental rights and freedoms. Our legitimate interests typically include improving, maintaining, providing, and enhancing our technology, and Products and/or Services; and ensuring the security of YEP's Portal and/or Platforms.

#### 12. TYPES OF PERSONAL INFORMATION WE PROCESS

- 12.1. Personal Information (without limiting the definition thereof as per POPIA), refers to any information relating to an identified or identifiable natural person or juristic person. YEP Processes the following Personal Information, if you actively provide this information to us:
- 12.1.1. first name, last name, date of birth, email address, country, job title, phone number, fax number, company name, and additional information that you provide when contacting us using our YEP Portal and/or Platforms, especially information provided in free text fields of contact forms ("contact data");
- 12.1.2. additional data that you provide to YEP in comments on YEP Portal and/or Platforms, especially in forms of discussion boards and using the comment features of blogs ("comment data");
- 12.1.3. additional data that you provide to YEP while applying for a job, e.g. your CV, certificates, attestations, etc. ("job application data");
- 12.1.4. email address, phone number, name, company name and country provided when subscribing to a newsletter or other marketing information of YEP ("direct marketing data"). In addition, we also Process the following personal information, which is passively collected:
  - a) Personal Information sent by your browser, i.e. information about your type of browser, your operating system and selected settings (e.g. language, region, font size, font types and other configuration) may be collected ("browser data");



b) your IP address, information about the amount of data transferred, stored in access log files ("usage data").

## 13. LAWFULNESS OF PROCESSING

- 13.1. We commit to Processing your Personal Information lawfully, within reason and in a manner that respects your right to privacy and aligned to the Lawful Purpose for which it is Processed, taking into account the adequacy and relevance thereof at all times.
- 13.2. The lawfulness for the Personal Information Processing is the performance of a contract or steps prior to communicating, engaging with you and/or referring you to our business partners or Affiliates (Associates). Using this Personal Information is required to ensure that we are able to provide you with the information or assistance you require from us. Without this Personal Information you will not be able to communicate, engage with or being referred to our Associates.

## 14. CONSENT, JUSTIFICATION AND OBJECTIONS

- 14.1. In so far that you have given the Consent, YEP will also use your direct marketing data for marketing purposes, e.g. to send newsletters. The lawfulness for Processing your direct marketing data is our legitimate interest, e.g. to improve our communication, engagement, services, or your consent.
- 14.2. In so far that you have given the Consent, we will also use your browser data for market research and the improvement of our YEP Portal, Platforms Products and/or Services, and to improve your user experience. The lawfulness for Processing your browser data is your Consent or our legitimate interest.



- In so far that you have given the Consent, we will also collect your usage data for statistical purposes, for the analysis of advertisement on our YEP Portal and/or Platforms and for adapting the advertisement for our Products and/or Services to better match your interests. Log files are only used for statistical analysis of the visitors to our YEP Portal and/or Platforms. The usage data is deleted (subject to record keeping requirement in terms of POPIA and/or provisions of any applicable laws), after having been analyzed. The lawfulness for Processing this usage data is for statistical purposes and our legitimate interest, e.g. internal organization, or your consent.
- 14.4. We will also use your usage data for internal system-specific purposes to secure our YEP Portal and/or Platforms and IT systems from malicious attacks by third parties. The lawfulness is a balancing of interests of the conflicting interests of the security of the IT systems on our part and your potential conflicting interests in a non-processing of the usage data by us. Taking into account the security and organizational measures of the Processing of the usage data by YEP, we consider your rights and interests appropriately taken into account and protected.
- 14.5. Beyond these purposes, we use and Process your Personal Information only if you have expressly granted your prior Consent thereto and if you have been informed about such purposes.
- 14.6. Please note that: -
- 14.6.1. you can object, at any time for the Processing of your Personal Information irrespective of the Purpose, on reasonable grounds (unless legislation allows for such Processing) by sending us an email at info@yep.co.za in a prescribed manner.
- 14.6.2. providing the direct marketing data and browser data is optional. If you do not provide this Personal Information, you will not receive any direct marketing information from us, and your data will not be used to improve your user experience and will not be used for statistical purposes.
- 14.6.3. Once we obtain the abovementioned objections, we will no longer Process your Personal Information.

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#### 15. USE

- 15.1. The lawfulness for the Personal Information Processing is the performance of a contract or steps prior to communicating, engaging with you and/or referring you to our Associates. Using this Personal Information is required to ensure that we are able provide you with the information or assistance you require from us. Without this Personal Information you will not be able to communicate, engage with or be referred to our Associates.
- 15.2. In so far that you have given the Consent, YEP will also use your Personal Information for marketing purposes, e.g. to send newsletters. The lawfulness for Processing your Personal Information is our legitimate interest, e.g. to improve our communication, engagement, services, or your Consent.
- 15.3. In so far that you have given the Consent, we will also use your browser data for market research and the improvement of our YEP Portal, Platforms Products and/or Services, and to improve your user experience. The lawfulness for Processing your Personal Information is your Consent or our legitimate interest.
- In so far that you have given the Consent, we will also collect your usage data for statistical purposes, for the analysis of advertisement on our Website, YEP Platforms and for adapting the advertisement for our services to better match your interests. Log files are only used for statistical analysis of the visitors of our YEP Portal and/or Platforms. The Personal Information is (subject to record keeping requirement under POPIA and/or provisions of any applicable law), deleted after having been analyzed. The lawfulness for Processing this Personal Information is for statistical purposes and our legitimate interest, e.g. internal organization, or your Consent.
- 15.5. Providing the direct marketing data and browser data is optional. If you do not provide this Personal Information you will not receive any direct marketing information from us, and your data will not be used to improve your user experience and will not be used for statistical purposes.

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- 15.6. We will also use your usage data for internal system-specific purposes to secure the YEP Portal, Platforms and IT systems from malicious attacks by third parties. The lawfulness is a balancing of interests of the conflicting interests of the security of the YEP Portal, Platforms and IT systems on our part and your potentially conflicting interests in a non-processing of the usage data by us. Taking into account the security and organizational measures of the Processing of the usage data by YEP, we consider your rights and interests appropriately taken into account and protected.
- 15.7. Beyond these purposes, we use and Process your data only if you have expressly granted your prior consent thereto and if you have been informed about such purposes. For example, you may stipulate in an online job application whether we may also review such application with respect to other positions in our company. Only if this is the case, we will use such data for the respective purpose.
- 15.8. In particular YEP does not use your Personal Information for automated individual decisions and profiling.

#### 16. PURPOSE

- 16.1. Our intention in collecting, Processing and using your Personal Information is to the extent required to:
- 16.1.1. fulfil the respective Purposes, being for Processing your contact data, comment data and job application data;
- 16.1.2. Providing Products and/or Services that you make use of using our YEP Portal e and/or Platforms, these are amongst others, downloads, discussion boards, job applications, individual requests (e.g. using a contact form), blogs or other offerings of YEP

### 17. FURTHER PROCESSING

17.1. Your Personal Information will be received by our personnel and/or associates and we commit to ensuring that the use of your Personal Information will be aligned to our privacy statement to you.

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- 17.2. Your Personal Information will be Processed by personnel and/or Associated of YEP in the respective departments, on a need to know basis.
- 17.3. **contact data**: any departments that might be involved to Process your request.
- 17.4. **comment data**: marketing or the respective service offering departments that are responsible for operating the YEP Platforms.
- 17.5. **job application data**: HR and the departments that are responsible for the job position that you apply to.
- 17.6. **direct marketing data**: marketing departments.
- 17.7. **browser data and usage data**: marketing and the IT departments that are responsible for operating the YEP Portal and/or Platforms.
- 17.8. YEP has contracted external data processing service providers to collect, Process, or use Personal Information on behalf and according to the instructions of YEP such service providers support YEP, especially relating to hosting and operating the YEP Portal and/or Platforms, marketing purposes, statistical analysis, improving the YEP Portal and Platforms and sending our email newsletters. If these external companies have access to Personal Information respective Personal Information Protection Agreements are in place.
- 17.9. Beyond that, we do not forward your Personal Information to other third parties except Third Party Suppliers and/or Third Party Service Providers, unless we are obliged to do so by virtue of statutory provisions or order of any judicial or other public authorities or you have explicitly given your Consent for that Purpose. In particular, your Personal Information will not be sold, leased or exchanged.



#### 18. INFORMATION SENT BY EMAIL

- 18.1. Provided that you have given YEP your email address for communication or direct marketing purposes and consented to the receipt of advertising and newsletters, we will Process your Personal Information in order to communicate with you on the basis of your interests or to send you advertising. The legal basis for the Processing of Personal Information for direct marketing purposes is your Consent or our legitimate interest in direct email communication. You can revoke your Consent at any time and object to Processing for direct marketing purposes at any time by clicking on "opt out" or "unsubscribe".
- 18.2. Providing your email address or telephone number for direct marketing purposes is voluntary. If you do not provide these to us, you will not receive any advertising from us.

#### 19. PARTICIPATION IN YEP PLATFORMS

- 19.1. On our YEP Portal, we offer you the opportunity to participate in Platforms. In order to use them, it may be necessary to enter certain Personal Information (email address, first name and last name, company name and country, contact number) to enable us to identify and, where appropriate, comply with the obligation to retroactively identify authors of illegal content. The details of this Personal Information are voluntary for you. Please note that you may not be able to use Platforms if you do not want to provide your Personal Information. This is associated with no further disadvantages.
- 19.2. When participating in the Platforms your Personal Information is not disclosed to other participants unless you have consented thereto in your user profile. In this context, our YEP Terms pertaining to Platforms apply when registering for access to YEP Platforms.



#### 20. TECHNICAL AND ORGANIZATIONAL DATA PROTECTION

20.1. We implement the technical and organizational measures that are commercially reasonable in relation to the respective purpose of data protection, in order to protect the Personal Information provided by you against abuse and loss. Such Personal Information is stored in a secure operating environment that is not accessible to the public. In addition, each of our employees is instructed on data protection and obliged to enter into a confidentiality agreement.

## 21. OUR SECURITY

21.1. We take appropriate and reasonable technical and organizational measures to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the Processing of the Personal Information. For further information about our security practices and/or security of your Personal Information, you may contact us at support@yep.co.za.

## 22. RETENTION AND RESTRICTION OF RECORDS

22.1. Your Personal Information will be kept by us as long as necessary to provide you with the requested service. If YEP Platforms no longer require your Personal Information to comply with contractual or legal obligations, they will be deleted from our systems or anonymized accordingly, so that identification is not possible, unless YEP has to keep the information, including your Personal Information, to comply with legal or regulatory obligations (e.g. statutory retention periods which may arise from the commercial laws or tax laws and may in principle be 5 (five) to 7 (seven) years or, if during the statutory limitation periods, which are regularly 5 years, but may be up to 7 years, evidence must be secured).

## 23. DATA SUBJECT RIGHTS

23.1. Under applicable law, you have the right under certain circumstances to (i) request information about your stored Personal Information, (ii) rectification of your Personal Information, (iii) restriction of processing of your Personal Information, (iv) deletion of your Personal Information, (v) data portability, (vi) revocation of your consent for processing of your Personal Information and (vii) object to the processing of your Personal Information.

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- 23.2. To exercise these rights, please contact our Information Officer at: info@yep.co.za. We respond to all requests we receive from user wishing to exercise their Personal Information protection rights in accordance with POPIA. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your contact, we will either direct the contact to reach out to you, or, if appropriate, we may respond directly to their request.
- 23.3. You also have the right to file a complaint with the Information Regulator at http://www.justice.gov.za/inforeg/.
- 23.4. Please feel free to direct any questions, comments, or complaints regarding this privacy statement or the privacy practices of YEP to our Information Officer:

#### 24. DATA SUBJECT RIGHTS

- 24.1. Under POPIA you have the right as the Data Subject under certain circumstances to:- (i) request information about your stored Personal Information, (ii) rectification of your Personal Information, (iii) restriction of Processing of your Personal Information, (iv) deletion of your Personal Information, (v) restrict data portability, (vi) revocation of your Consent for Processing of your Personal Information and (vii) object to the Processing of your Personal Information. In Detail this is:
- 24.1.1. **Right to information**: You have the right to ask us for confirmation of the Processing of your Personal Information in question and, if so, of your right to information about such Personal Information. The right to information includes, among other things, the Processing purposes, the categories of Personal Information being processed and the recipients or categories of recipients to whom the Personal Information is disclosed. You may also have the right to receive a copy of the Personal Information that is the subject of the Processing. However, this right is limited in that, the rights of others may limit your right to receive a copy.
- 24.1.2. **Right to rectification**: You may be entitled to request the correction of incorrect Personal Information concerning you. In consideration of the purposes of processing, you have the right to request the completion of incomplete Personal Information, including by means of a supplementary statement.

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- 24.1.3. **Right to erasure** ("**Right to be forgotten**"):- Under certain conditions, you have the right to ask us to delete your Personal Information which may also not be approved if such deletions will affect YEP compliance with its statutory requirements.
- 24.1.4. **Right to restriction of Processing**: Under certain circumstances, you have the right to demand that we restrict the Processing of your Personal Information. In this case, the corresponding data will be marked and Processed by us only for specific Purposes.
- 24.1.5. **Right to data portability**: Under certain circumstances, you have the right to receive the Personal Information relating to you that you have provided to us in a structured, commonly used and machine-readable format and you have the right to transfer that data to another person without obstruction by us.
- 24.1.6. **Right to revocation of consent**: If you have given your consent for some data Processing activities, you may revoke your consent at any time with future effect. Such revocation shall not affect the lawfulness of the Processing on the basis of the Consent until the revocation.
- 24.1.7. Right to object: For reasons arising from your particular situation, you have the right to object to the Processing of Personal Information relating to you on the basis of Section 11 of Condition 2 of Part 3, POPIA (data processing based on legitimate interests). If you object, we will no longer process your Personal Information unless we can establish compelling legitimate grounds for Processing that outweigh your interests, rights and freedoms, or the Processing is for the purposes of asserting, exercising or defending legal claims.
- 24.2. To exercise these rights, please contact our Information Officer at: info@yep.co.za. We respond to all requests we receive from user wishing to exercise their Personal Information protection rights in accordance with POPIA. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your contact, we will either direct the contact to reach out to you, or, if appropriate, we may respond directly to their request.
- 24.3. You also have the right to file a complaint with the Information Regulator at http://www.justice.gov.za/inforeg/.

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24.4. Please feel free to direct any questions, comments, or complaints regarding this privacy statement or the privacy practices of YEP to our Information Officer.

## 25. PRIVACY POLICY UPDATES

25.1. This Privacy Policy supersedes and replaces all previously posted Privacy Policies.

Our Privacy Policy is regularly reviewed and revised to make sure we continue to serve the best interests of our customers. We reserve the right to update this Privacy Policy to reflect any changes. If we decide to change our Privacy Policy, we will post those changes to this Policy and other places we deem appropriate, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If the change would cause us to use or disclose personal information in a manner that is materially less restrictive from that stated at the time of collection, we will notify YEP Portal visitors before implementing the change.

## 26. CONTACTING US: QUESTIONS, COMMENTS, & CONCERNS

- 26.1. YEP will happily address any concerns about its online privacy practices and policies; please e-mail us at support@yep.co.za.
- 26.2. To be removed from future YEP marketing e-mail campaigns, please support@yep.co.za.

# 27. **DISPLAY ADVERTISING**:

- 27.1. We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie unless we have robust notice of, and the user's or Customer's prior affirmative (i.e., 'opt-in') consent to, that merger.
- 27.2. The Google Analytics features we have implemented is based on Display Advertising (e.g., Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting).
- 27.3. Using the Ads Settings, visitors can 'opt-out' or "unsubscribe" of Google Analytics for Display Advertising and customize Google Display Network ads. We are encouraged to point visitors to Google Analytics' currently available 'opt-outs' or "unsubscribe" for the web.

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- 27.4. We use Remarketing with Google Analytics to advertise online.
- 27.5. Third-Party Service Providers, including Google, may show our ads on sites across the Internet.
- 27.6. We and Third Party Service Providers, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to our website.
- 27.7. We and Third Party Service Providers, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site.
- 27.8. How we use data from Google's Interest-based advertising or 3rd-party audience data (such as age, gender, and interests) with Google Analytics.
- 27.9. Because laws across countries and territories vary, and because Google Analytics can be used in many ways, Google is unable to provide the exact language we need to include in our privacy policy. We understand the unique aspects and special considerations of our business, and our privacy policy should account for this information that only we can provide.