

SNAPnSAVE PRIVACY POLICY

Last Updated: 12 June 2017

This Privacy Policy ("**Privacy Policy**") explains how SnapnSave (Pty) (Ltd) SNAPnSAVE, ("SNAPnSAVE," "us," "our," and "we"), collects and uses information when you interact with us. This Privacy Policy applies to all users of SNAPnSAVE's website as published at www.SnapnSave.co.za (and any other websites with "SNAPnSAVE" branding that link to this Privacy Policy), and any mobile-device applications we offer, such as our iOS and Android applications, that are branded "SNAPnSAVE" and link or reference this Privacy Policy (collectively, the "**Services**").

Please read this Privacy Policy carefully. This Privacy Policy replaces and supersedes the last version of this Privacy Policy for all users (including those users that registered prior to the Effective Date). If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Services. By using the Services, you consent to the privacy practices described in this policy.

This Privacy Policy is incorporated into and is subject to the SNAPnSAVE Terms and Conditions. Capitalized terms that are not defined in the Privacy Policy have the meaning given to them in the Terms and Conditions.

1. Types of Personal Information We Collect

Personal Information is information that can be used to identify, locate, or contact an individual user. It also includes other information that may be associated with Personal Information. You may provide us with Personal Information when you update Profile information, use the Service, post User Content, interact with other users of the Service through communication or messaging features, or send us customer service related requests.

We collect the following types of Personal Information:

Contact Information that allows us to communicate with you, such as your name, email addresses, social media website user account names, telephone numbers, or other addresses at which you receive communications from or on behalf of SNAPnSAVE.

Relationship Information that helps us to understand who you are and what types of offers you might like. This includes lifestyle, preference, and interest information; location information related to your province, city, or postal code; the types of offers that interest you; information collected from social media interactions (such as via Facebook Connect and Twitter); and demographic information (e.g., birth date, age, gender).

Transaction Information about how you interact with the Services, such as the offers you view and redeem, other products you purchase, and the stores you prefer; other information about how you use our Services, email, other communications, and applications; and how you interact with SNAPnSAVE's merchants, business partners, and service providers.

Location Information to help us deliver to you offers near your present location, if you have activated our Services on a mobile device and permitted your mobile device to transmit location data. Please see the Profile section under the heading "mobile" for more information on the types of Personal Information that SNAPnSAVE may collect from the Services operating on a mobile device.

Bank Account Information including bank account number, bank account holder's name, branch code, bank name, branch account name which assists us when users cash out from their SNAPnSAVE Wallet to transfer funds via EFT Transfer to their nominated bank accounts.

2. How SNAPnSAVE Collects Personal Information

We may ask you for Personal Information when you register, subscribe, create a Profile, or otherwise interact with the Services or contact SNAPnSAVE.

We collect Personal Information when you use our Services or contact us for customer service purposes. We may use cookies and related technologies to collect information about your computer and your interaction with the Services. You can read more about cookies and other technologies in the Cookies and Related Technologies section.

If you use a social media platform, a mobile device or other third-party method of communication to interact with SNAPnSAVE or the Services, that platform may have a specific privacy statement that governs the use of Personal Information related to that platform. If you have questions about the security and privacy settings of your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

If you use the Services on a mobile device and your mobile device's settings allow it, we may collect Personal Information from your mobile device.

From time to time, we may obtain additional Personal Information from third parties. For example, we may collect Personal Information from third parties to help us better

understand you, and to otherwise enhance the Services.

3. How SNAPnSAVE Uses Personal Information

SnapnSave uses Personal Information to:

- Operate and improve our Services;
- Provide users with offers for products and services from participating brands and retail clients, including offers based on variables such as stated and anticipated user interests, personal characteristics, consumption of advertisements, or user location;
- Evaluate eligibility of users for certain offers, products or services;
- Evaluate the types of offers, products or services that may be of interest to users;
- Track redemption of offers and past purchases;
- Perform analytics;
- Provide customer support to users;
- Fulfil requests for SNAPnSAVE services;
- Communicate and provide additional information which may be of interest to you about SNAPnSAVE and our merchants and business partners, such as SNAPnSAVE news, special offers, announcements, and marketing materials;
- Send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- Provide advertisements to you through the Services, email messages, text messages, push notifications, applications, or other methods of communication;
- Administer surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our partners;
- Manage our everyday business needs such as website administration, forum management, analytics, fraud prevention, Terms of Use or to comply with the law;
- Carry out other purposes that are disclosed to you and to which you consent.

4. When and Why SNAPnSAVE Discloses Personal Information

We may share your Personal Information as described below:

- With our service providers that provide services for us to assist us in carrying out the purposes described in Section 3 above such as sending emails on our behalf, issuing gift cards, and administering sweepstakes and contests.
- With trusted third party business partners who are obligated to keep your information confidential.
- We will not utilize any user's personal information for anything other than using it for engagement purposes between SNAPnSAVE and the user.
- Users may have the option elect or opt-in to share their personal information with certain specified brands communicated on the SNAPnSAVE platform, in which case the user's personal information will be distributed to that specific brand.
- To effect a merger, acquisition, or otherwise; to support the sale or transfer of business assets; to enforce our rights or protect our property; to protect the rights, property or safety of others, investigate fraud, respond to a government request;

or as needed to support auditing, compliance, and corporate governance functions. We may also disclose Personal Information to defend ourselves in litigation or a regulatory action, and when required or advised to do so by law, such as in response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the South Africa and other countries where we operate. If SNAPnSAVE is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or prominent notice on one or more of our Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information; or

- Otherwise with your consent.

We encourage SNAPnSAVE's merchants and business partners to adopt and post their privacy policies. However, the use of your Personal Information by such parties is governed by the privacy policies of such parties and is not subject to our control. When you choose to interact with a SNAPnSAVE merchant or business partner, we encourage you to read any privacy policy they may have posted on their website.

SNAPnSAVE may also disclose information about you that is not personally identifiable. For example, we may provide our merchants, business partners, or other third parties with reports that contain aggregated data, statistical data, and/or anonymized data.

5. Cookies and Related Technologies

When you use our Services, we may collect certain information by automated or electronic means, using technologies such as cookies, pixel tags and web beacons, browser analysis tools, and web server logs. As you use our Services, your browser and devices communicate with servers operated by us, our business partners and services providers to coordinate and record the interactivity and fill your requests for services and information.

The information from cookies and related technology is stored in web server logs and also in web cookies kept on your computers or mobile devices, which are then transmitted back to our Services by your computers or mobile devices. These servers are operated and the cookies managed by us, our business partners or our service providers. For example, when you access our Services, SNAPnSAVE and our service providers may place cookies on your computers or mobile devices. These cookies may include means for tracking your Transaction Information with a Merchant and may include tracking technology from third-party affiliate-network operators. Cookies allow us to recognize you when you return, and track and target your interests in order to provide a customized experience. They also help us provide a customized experience and help us to detect certain kinds of fraud. A "**cookie**" is a small amount of information that a web server sends to your browser that stores information about your account, your preferences, and your use of the Services. Some cookies contain serial numbers that allow us to connect your activity with the Services with other

information we store about you in your profile or as related to your other interactions with the Services.

Some cookies are temporary, whereas others may be configured to last longer. "**Session**" cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases Session cookies once you exit your browser. "**Persistent**" cookies are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser. We use Persistent cookies for a number of purposes, such as retrieving certain information you have previously provided (such as your user id if you asked to be remembered), and storing your preferences.

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. When you access these pages or open email messages, the pixel tags and web beacons generate a notice of that action to us, or our service providers. These tools allow us to measure response to our communications and improve our web pages and promotions. We collect many different types of information from cookies and other technologies. For example, we may collect information from the devices you use to access our Services, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Browsers routinely send these types of information to web servers. Our server logs also record the Internet Protocol ("IP") addresses of the devices you use to interact with the Services.

An IP address is a unique identifier that devices used to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to our Services and the website you visit after you leave our Services, if this information is supplied to us by your browser.

In many cases, the information we collect using cookies and other tools is used in non-identifiable ways, without any reference to Personal Information. For example, we use information we collect about users to optimize our Services and understand its traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Privacy Policy governs how we use that information. Additionally, if you have visited our mobile website or activated one of our mobile-device applications, and if the settings on your location-aware device allow us to receive Location Information, we will collect that automatically. If we associate Location Information with other Personal Information, this Privacy Policy governs how we would use that information too. We also use third party services, such as Google Analytics, to help us understand how visitors interact with our website and to help improve our user experience.

6. Your Choices

We think that you benefit from a more personalized experience when we know more about you and the kinds of offers you like. However, you can limit the information you provide to SNAPnSAVE, and you can limit the communications that SnapnSave sends to you.

Email -/ SMS - / and Application Notifications

You can manage your email, SMS, Application notification preferences by logging into SNAPnSAVE's Service and going to the Notifications section under My Account in the Profile menu. You may also manage your email preferences by clicking "unsubscribe" on any email communication we send you. You may choose to subscribe to some types of messages, and may choose to unsubscribe from others.

Cookies

You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. Please note that if you disable cookies, you may be unable to access some customized features of our Services.

Location Service

Some of the features of the Service may enable SNAPnSAVE to access and collect information about your current or past location in order to personalize the Service for you and provide other features of the Services ("Location-based Features"). In order to use Location-based Features, you must give SNAPnSAVE permission to use your geo-location through your device. SNAPnSAVE may access your geo-location using a variety of means, including GPS, IP address, or cell tower location. You will have the opportunity to opt-out of using Location-Based Features by going to Profile and turning off the "Nearby Store Alerts" feature. If you choose not to allow SNAPnSAVE to use your location information or disable SNAPnSAVE's Location-based Features on your device under Profile, you will not be able to utilize certain features of the Service.

Alternatively, you may adjust the settings on your mobile device to prevent the sharing of Location Information. You may also manage how your mobile device or mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your mobile device and mobile browser settings. Please note that if you disable the sharing of Location Information, you may be unable to access some features of our Services that are designed for mobile devices.

The Personal Information collected by our Services via a mobile device may also include the following: (i) periodic collection of your location and time of day; (ii) the

names of the other applications on your mobile device and, if you use an Android-based mobile device, how you use them (e.g., frequency and duration of use); (iii) information about your mobile device (e.g., make, model, operating system, and other similar information, but not phone number); and (iv) information about your use of features, functions, or clicks on notifications or content. In addition to the other uses of your Personal Information described in this Privacy Policy, SNAPnSAVE may use and process Personal Information we collect via a mobile device to: (a) send notifications when you arrive at or leave places; and (b) infer the location of the places you visit most often, determine your frequency or the amount of time spent at these locations, and send notifications when you arrive at or leave those places.

Connecting through Social Networks

You may manage the sharing of certain Personal Information when you register with us through a social media platform or application, such as through Facebook Connect. Please refer to the privacy settings of the social media platform or application to determine how you may adjust our permissions and manage the interactivity between SNAPnSAVE and your social media account. By registering with SNAPnSAVE through a social media platform, you grant SNAPnSAVE permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network's terms of use and this Privacy Policy.

7. Accessing and Correcting Personal Information

Keeping Personal Information about you current helps ensure that we offer you the best offers available through our merchants and business partners. You may update or correct your profile information and preferences at any time by accessing your My Account under Profile through the Service. Please note that while your changes are reflected promptly in active user databases, we may retain all information you submit for a variety of purposes, including backups and archiving, prevention of fraud and abuse, and analytics.

If you want to close your account or have other questions or requests, or if you would like to access or request a correction to any other personal information we hold regarding you, please Contact Us. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at hello@snapnsave.co.za. In response, we will cancel or remove your information but may retain and use copies of your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

8. Security of Personal Information

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of your personally identifiable information. We cannot, however, ensure or warrant the security of any information you transmit to us

or store on the Service and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the Service if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach you should notify us at hello@snapnsave.co.za.

9. Privacy Settings

Although we may allow you to adjust your privacy settings to limit access to your information, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other users with whom you may choose to share your information. Therefore, we cannot and do not guarantee that information you post on the Service will not be viewed by unauthorized persons. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. You understand and acknowledge that, even after removal, copies of information that you have posted may remain viewable in cached and archived pages or if other users have copied or stored such information.

10. International Visitors

The Service is hosted in the South Africa and is intended for visitors located within the South Africa. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from South African law, then please note that you are transferring your personally identifiable information outside of those regions to the South Africa for storage and processing, and by providing your personally identifiable information on the Service you consent to that transfer, storage, and processing.

11. Changes and Updates to this Privacy Policy

Please revisit this page periodically to stay aware of any changes to this Privacy Policy, which may be revised periodically at our sole discretion, as provided in Section 3 of the SNAPnSAVE Terms of Use. If we modify the Privacy Policy, we will make it available through the Service, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your e-mail address, if we have one on file, or generate a pop-up or similar notification when you access the Service for the first time after such material changes are made.

Our amended Privacy Policy will automatically take effect 30 days after it is made available through the Service, except that (i) we generally only use your personally

identifiable information in the manner described in the Privacy Policy in effect when we received that information and (ii) if you do not agree with any changes to the Privacy Policy, you may terminate your account and stop using the Service. Your continued use of the Service after the revised Privacy Policy has become effective indicates that you have read, understood and agreed to the current version of the Privacy Policy.

12. Our Contact Information

Please contact us with any questions or comments about this Privacy Policy, your personally identifiable information, our use and disclosure practices, or your consent choices by e-mail at hello@snapnsave.co.za

501 Earlgo House
42 Park Road
Gardens
Cape Town
8001