



PRIVACY STATEMENT

*This Privacy Statement applies to any person whose personal information is processed by Huge NXTGN Proprietary Limited (the **Company**), including personal information that is processed because of email or other correspondence.*

1. Our privacy commitment

- 1.1. The Company respects the privacy and confidentiality of the personal information of customers, employees, service providers, and any other natural or juristic person who interacts with it — including exchanging emails with an employee or other agent of the Company.
- 1.2. The Company is committed to complying with South African data protection legislation, in particular the Protection of Personal Information Act 4 of 2013 (**POPIA**).
- 1.3. This Privacy Statement explains how the Company obtains, uses, and discloses your personal information (**Personal Information**), as required by POPIA.
- 1.4. It applies to customers, website users, employees, service providers, job applicants, and any person who sends or receives correspondence to or from the Company, including by email.

2. Lawful basis for processing your Personal Information

- 2.1. As the responsible party (the **Responsible Party**), the Company only processes Personal Information where it has a lawful basis to do so under section 11 of POPIA, which may include one or more of the following, depending on context:
 - 2.1.1. your consent;
 - 2.1.2. processing necessary to conclude or perform a contract to which you are a party;
 - 2.1.3. processing necessary to comply with a legal obligation;
 - 2.1.4. processing necessary to protect a legitimate interest of yours;
 - 2.1.5. processing necessary for the proper performance of a public law duty; or
 - 2.1.6. processing necessary to pursue the legitimate interests of the Company or a third party to whom the information is supplied.
- 2.2. Where you have entered into an agreement with the Company (for example, a Master Service Agreement), this Privacy Statement forms part of the terms of that agreement, and your continued engagement with the Company is deemed acceptance of this Privacy Statement in that context. Where this Privacy Statement, or any other document concluded between the parties, contains or incorporates more than one privacy statement applicable to the same processing of Personal Information, and those privacy statements conflict or are inconsistent, the privacy statement affording the higher standard of protection to the data subject (the **Data Subject**) shall prevail, having regard to factors such as the scope of Personal Information covered, retention periods, security safeguards, Data Subject rights, and restrictions on cross-border transfer. If the parties cannot agree which privacy statement affords the higher standard, the Company's Privacy Statement shall prevail pending

resolution. Nothing in this paragraph reduces either party's obligations under POPIA. Where no such agreement exists — for example, where you are corresponding with a Company employee/agent by email as a colleague, service provider, or member of the public — the Company processes only the Personal Information reasonably necessary to conduct that correspondence and any resulting business, on the lawful bases set out in clause 2.1.

3. What is Personal Information?

3.1. Personal Information is defined in POPIA and includes any information which identifies you as an individual, such as your name, identity number, postal and street address, email address, telephone number, and, where applicable to the relationship, credit vetting information, banking details and payment history, and may also include:

- 3.1.1. information relating to race, gender, sex, pregnancy, marital status, national or ethnic or social origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, and birth;
- 3.1.2. information relating to education, medical, financial, criminal, or employment history;
- 3.1.3. identifying numbers or symbols such as a cell phone number, account number, email address, physical address, telephone number, location information, or online identifier;
- 3.1.4. biometric information;
- 3.1.5. personal opinions, views, or preferences;
- 3.1.6. correspondence sent by a person that is implicitly or explicitly private or confidential, or further correspondence that would reveal the contents of the original correspondence; and
- 3.1.7. the views or opinions of another individual about the person.

3.2. **Special Personal Information** (such as the categories in paragraph 3.1.1) and information relating to children is subject to additional conditions under POPIA (sections 26–27 and 34); the Company will only process such information where a ground for lawful processing under those sections applies.

4. Personal Information collected through correspondence, including email

4.1. Where you correspond with the Company by email (whether as a customer, colleague, service provider, job applicant, or any other person) the Company will typically process:

- 4.1.1. your name, email address, and any contact details included in your signature or message;
- 4.1.2. the content of your correspondence and any attachments; and
- 4.1.3. metadata associated with the correspondence (such as date, time, and routing information) for record-keeping, security, and legal compliance purposes.

4.2. Personal Information which is processed on the lawful bases described in paragraph 2, will be retained, used, and protected in accordance with this Privacy Statement, in the same manner as Personal Information collected through any other channel.

5. Why and how do we collect your Personal Information?

- 5.1. The Company collects Personal Information directly from you; for example:
 - 5.1.1. when you enter into an agreement with the Company for products or services;
 - 5.1.2. when you correspond with, or submit enquiries to, the Company by email, telephone, or web form;
 - 5.1.3. when you apply for or take up employment with the Company; or
 - 5.1.4. when you have a service-provider relationship with the Company.
- 5.2. The Company also collects Personal Information indirectly or from third parties, including:
 - 5.2.1. information from the use of Company services and products;
 - 5.2.2. information regarding website usage;
 - 5.2.3. publicly available records, including information you have made public yourself;
 - 5.2.4. information from credit bureaus, where relevant; and
 - 5.2.5. information from representatives you have appointed, where you act on behalf of a corporate entity.
- 5.3. The Company will only collect Personal Information from other sources where it is legally entitled to do so or where it is obliged to do so, and you are entitled to ask the Company which sources were used where Personal Information was not provided directly by you.
- 5.4. Purposes of collection specifically include:
 - 5.4.1. entering into and performing agreements for Company products and services;
 - 5.4.2. responding to correspondence, enquiries, and queries;
 - 5.4.3. maintaining business, employment, or service-provider relationships;
 - 5.4.4. improving Company product and service offerings;
 - 5.4.5. complying with statutory reporting requirements; and
 - 5.4.6. protecting your or the Company's legitimate interests or legal rights.

6. How do we use your Personal Information?

- 6.1. **Processing** under POPIA includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying, or disposing of Personal Information.
- 6.2. The Company will only further process your Personal Information where this does not conflict with the purposes in paragraph 5, and is permitted under POPIA, including to:
 - 6.2.1. protect the integrity of the Company's electronic communications network and systems, and those of contracted network operators;
 - 6.2.2. prevent and detect fraud, and manage information security and privacy incidents;
 - 6.2.3. understand how Company products and services are used, to develop relevant offerings;
 - 6.2.4. share information with third parties involved in providing Company products or services, which may include third parties in other countries, only where the Company has a contractual commitment that adequate Personal Information protection safeguards are in place, consistent with section 72 of POPIA;

- 6.2.5. conduct debt recovery;
- 6.2.6. send promotional communications, only with your consent or where you have previously requested a related product or service, with an opt-out available on every communication, in line with section 69 of POPIA; and
- 6.2.7. conduct historical, research, or statistical analysis, where outcomes will not be published in identifiable form.

7. How long will your Personal Information be retained?

- 7.1. The Company retains Personal Information only for as long as necessary to fulfil the purpose for which it was collected, unless a longer period is required for legitimate business reasons or statutory retention requirements.

8. What rights and obligations do you have?

- 8.1. You have the right to:
 - 8.1.1. access the Personal Information the Company holds about you;
 - 8.1.2. request correction of outdated or incorrect Personal Information;
 - 8.1.3. request deletion or destruction of your Personal Information, or object to its processing, using the accessible channels set out below (including email, SMS, WhatsApp, post, or hand delivery); and
 - 8.1.4. lodge a complaint with the Information Regulator if you are not satisfied with the Company's response.
- 8.2. Requests should be sent to the Company's Information Officer (Legal@hugeconnect.co.za) using the procedure set out on the Company's website: <https://hugeconnect.co.za/>
- 8.3. Fulfilling certain requests may require the Company to suspend or terminate a service or agreement, and certain records are subject to statutory retention periods that may prevent immediate deletion.
- 8.4. If a request pertinent to Personal Information (provided that it was properly submitted as per the mentioned procedures) is unresolved to your satisfaction, such complaint may be escalated to the Information Regulator. Under current POPIA Regulations, complaints may be lodged by the Data Subject and by any person with a sufficient legal interest in the matter or acting in the public interest.
- 8.5. The Company will take reasonable steps to confirm your identity before providing Personal Information, and a legally permissible fee may apply to access requests.

9. Will your Personal Information be protected?

- 9.1. The Company is obliged to provide adequate protection and safeguards for Personal Information it holds and commits to technological and physical controls to prevent unauthorised access or use, in line with section 19 of POPIA and industry practice.
- 9.2. The Company will review its security controls on an ongoing basis.
- 9.3. In the event of a security compromise affecting your Personal Information, the Company will notify the Information Regulator and affected Data Subjects as required under section 22 of POPIA, including a

description of the compromise, its likely consequences, and the measures taken or recommended in response.

10. Changes to this Statement

10.1. The Company reserves the right to amend this Privacy Statement at any time, by posting the amended version on Company's website, with the effective date updated accordingly.