

Privacy Policy

Introduction

1 Your privacy is important to us. We strive to ensure that our use of your personal information is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our services and your experience.

2 This privacy policy sets out what personal information we collect from you when you use our site (which could be our website, mobile site, an application or any other electronic platform), how we collect your personal information, why we collect it and how we use it, and related matters.

3 Please read this privacy policy carefully to understand our views and practices regarding your personal information and how we will treat it (even if you're a long-standing site user) and contact us if you need any clarity or assistance, using the contact details set out in paragraph 67 below.

4 This privacy policy forms part of our website terms and conditions, which are available at <http://www.dstv.com/pages/TermsConditions/>.

Children

5 Our site is not targeted at children under the age of 13.

Application of this policy

6 This privacy policy applies to:

6.1 us, namely MultiChoice Africa Holdings BV and/or Electronic Media Network Ltd and/or SuperSport International (Pty) Ltd, or MultiChoice Operations (Pty) Ltd as agents of these entities, and their successors-in-title;

6.2 you, namely a person who accesses our site, regardless of the device which you use to access it (e.g. a computer, mobile phone, tablet etc).

7 This privacy policy does not apply to other parties' sites, products or services, such as sites linked to, from or advertised on our site, or sites which link to or advertise our site.

What is personal information?

8 Personal information refers to private information about an identifiable person, such as your name and surname, gender, age, date of birth, contact details (e.g. your home address, postal address, e-mail address or phone number), physical location, ID number and your image (such as a private photograph on a social networking site).

9 Other information which might be “personal” information may include:

9.1 “device and device event information”: We may collect information such as your IP address, unique device identifier, the nature of the device which you used to access our site (e.g. a computer, tablet or smart phone, and which type thereof), the geographic location from which you accessed our site (i.e. the geographic location of your device), hardware model and settings, operating system type and version, browser type and version, browser language, system activity, crashes;

9.2 “log information”: When you use our site, we may automatically collect and store certain information in server logs (i.e. our web servers automatically record and maintain a log of their activities when users access our site), which may include your “site activity information”, such as details of how, when and for how long you accessed and used our site and other site traffic and use information (e.g. the date and time of your site requests, referral web pages (i.e. which site pages directed you to our site), landing pages (i.e. the page at which you accessed our site), URLs, which pages you accessed, the number of pages viewed and the order of those pages, the amount of time spent on those pages, the number of clicks, which games you played, when and how long you played any game, how you interacted with other site users, and exit pages (i.e. sites which you navigated to when leaving our site);

9.3 “location information”: We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location); and

9.4 “unique application numbers”: Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to us when you install or uninstall such a service or when that service periodically contacts our servers, such as for automatic updates.

How we collect your personal information

10 We collect your personal information in four ways, namely:

10.1 actively from you;

10.2 passively from your device when you use our site;

10.3 passively from social networking sites (subject to your privacy settings); and

10.4 passively from companies in the MultiChoice South Africa Group of companies (our “affiliates”) and third party service providers.

Active collection of personal information from you

11 Some areas of our site may require you to submit certain information in order for you to register for certain services or benefit from specified features, such as when you register on the site, request to receive any newsletters or similar subscriptions or tips/pointers, or participate in a particular activity, such as a game, promotional competition or other promotion (collectively referred to as the “value added services”). If you contact us, we may keep a record of that correspondence.

12 If you want to take advantage of any of our site sharing features, we will ask you to create a publicly visible profile, indicating, for example, your username, e-mail address and, if you so wish, your photo.

13 Our site may also collect personal information from you by asking you specific questions and by permitting you to communicate directly with us, for example via e-mail, feedback forms, site comments and forums.

14 In these situations, we will:

14.1 ask you for particular information;

14.2 inform you at each information point what information is required and what information is optional; and

14.3 indicate the consequences if you don't give us the relevant information. (You will generally need to provide us with the relevant information in order to take full advantage of the site features.)

15 The information we may actively collect from you may include your:

15.1 identifying information (e.g. your name, surname, username, unique identifier (if you haven't chosen a username), gender, date of birth, profile picture and physical location);

15.2 contact details (e.g. e-mail address and phone number); and

15.3 other information which we may request from you from time to time.

Passive collection of personal information from your device

16 We passively collect some of your personal information from the device which you use to access and navigate through our site, using various technological means.

17 One of the key ways in which we collect information passively is using server logs to collect and maintain log information (see paragraph 9.2 above).

18 We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit our site, to distinguish you from other site users and to improve our service to you.

19 A cookie is a small piece of data (an alphanumeric identifier) which our computer system transfers to your device through your web browser when you visit our site and which is stored in your web browser. When you visit the site again, the cookie allows the site to recognise your browser. Cookies may store user preferences and other information.

20 Cookies also enable us to analyse usage of our site, diagnose problems with our server, aggregate and report information, ensure our records are complete, accurate and up to date, determine the fastest route for your computer to use in connecting with our site, and better administer and improve the site, recognise you when you next access our site to remember your preferences and to tailor our services to you, manage and target advertising on our site, as well as to compile aggregate information about your access to and use of our site. This information can be used to enhance the content of our site and make it more user-friendly, as well as to give you a more personalised experience.

21 Please note that you may disable the use of cookies by configuring your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do so, you may not be able to enjoy all of the site features and functionality.

22 The information which we may passively collect from your device may include your identifying information, contact details, device and device event information, site activity information, log information, telephony log information, location information, unique application numbers (see paragraph 9 above) and any other information which you permit us, from time to time, to passively collect from your device.

Passive collection of personal information from social networking sites (with your permission)

23 We may allow you to log onto our site, or create a profile on our site, by using Facebook Connect or another social networking site authentication option.

24 By collecting information from social networking sites we enable you to enrich your profile on our site, your game-play and your social experience by enabling you to share your information (e.g. posts, photos, videos, contacts, etc) which is stored on that site without you having to actively give us all that information – all you need to do is login using your username and password and give us your permission to access and use that information.

25 There are two kinds of information which we collect from social networking sites, namely basic information and extended information.

(i) Basic information

26 Basic information is information which you have put on a social networking site which you have made public in accordance with your privacy settings on the relevant social networking site.

27 This could include your name and surname, username or user-ID number, your profile picture or its URL, your e-mail address, the physical location of your device, your gender, your date of birth, and any other information which you have decided to share publically (i.e. the information which you have put on your social networking site profile for anyone to see).

28 We will access your basic information from a social networking site only:

28.1 when you log on to a social networking site from our site or if you select the “keep me logged in” function;

28.2 with your permission; and

28.3 in line with your privacy settings on the relevant social networking site.

(ii) Extended information

29 Extended information is information which you have put on a social networking site over and above the basic information. This could include your additional identifying information and contact details, biographical information, educational history, personal preferences, religion, your “friends” or contacts on the social networking site, your “likes” and “dislikes”, information you have “shared” (e.g. comments on, or shared content on, your or your friend's Facebook “wall”), your recommendations to your friends or other social networking site contacts, your game scores and rankings, and any other information which you have put on, or actions you have done, on a social networking site (e.g. the information on your Facebook “wall”, your game score predictions, or the trophies you've won on our games), and any other information which you permit us, from time to time, to passively collect from a social networking site.

30 We will collect from the relevant social networking site your extended information only if and to the extent that you give us permission to do so.

31 You can decide the layers of extended information which you want to share with us and manage it either through our site or the relevant social networking site (e.g. you might decide, depending on your personal preferences, to allow us to post on your wall when you win a game or to send a notification to your Facebook friends on your behalf).

32 We may offer you the ability to import your address book contacts or to manually enter third parties' contact details in order to populate your invite list on our site (“your contacts”). You may authorise us to send your communications to your contacts on your behalf (e.g. to send your contact an e-mail or notification from you or on your behalf inviting him/her to join your online game sports pool).

33 Each application on our site will have its own default privacy setting. You can manage your settings at the time of giving us your permission or at any time thereafter by clicking on “My profile” on our site or on the relevant social networking site, or in any other manner which we make available on our site from time to time.

34 Your permission will expire if you do not access our site for a period of 60 continuous days. If it expires, you will need to refresh it when you next log in to our site.

35 We only receive information from social networking sites – we do not give them access to any of your personal information.

Passive collection of personal information from our affiliates and third party service providers

36 We collect some personal information passively from our affiliates and third party service providers, purely to supplement information which you have already agreed to give us, to supplement your user profile on our site and to help you and your friends connect.

Why we collect your personal information and how we use it

37 We use the information we collect to provide, maintain, and improve our services, to develop new ones, and to protect us, our services and our users. We constantly strive to improve our users' experience, and so we also use the information we collect in order to offer you information and content which is more appropriately tailored for you.

38 We may collect and use your personal information to:

38.1 establish and verify your identity;

38.2 to create your user account and ensure that it doesn't duplicate an existing user account on our site (if you have an existing user account we will merge the two accounts on our computer systems) and allow use of our site, products and services;

38.3 maintain and update our customer, or potential customer, databases;

38.4 greet you when you access our site;

38.5 communicate with you in various ways (determined by you in your privacy settings), such as e-mail, post, telephonically, SMS notifications, instant messaging or other notifications to your device (e.g. on-screen pop-up messages);

38.6 enable user to user communications;

38.7 request feedback on our site, products and servers, address any issues and liaise with users in that regard;

38.8 keep a record of our communications with you and your communications with us;

38.9 fulfil any contractual obligations we may have to you or any third party;

- 38.10 provide you with value added services (see paragraph 11 above);
- 38.11 to identify and inform you of points of interest or goods/services of interest near to your location, using your location information;
- 38.12 improve the content of our site and our products and services;
- 38.13 allow you to participate in interactive features (e.g. games) and sharing features (e.g. social networking integration) of our site, if you choose to do so, including keeping you informed of your in-game activities (e.g. comments from friends, game status, results and leaderboard, friend requests, notifications, etc);
- 38.14 combine your personal information from a social networking site with the information on our site to streamline and complete our records and to make it easier for you to share things with people you know;
- 38.15 improve your user experience and the overall quality of our services;
- 38.16 customise our site to your preferences and tailor information and/or content for you to ensure that it is presented in the most effective manner for you and for your device;
- 38.17 inform you of facts relating to your access to and use of our site;
- 38.18 inform you about our products and services which we think may interest you (as long as you have consented to this);
- 38.19 inform you about competitions, promotions and special offers from us (as long as you have consented to this);
- 38.20 inform you about any changes to our site, our products and services, our terms of use, this privacy policy or other changes which are relevant to you;
- 38.21 carry out marketing, product research and development;
- 38.22 to tailor general advertising on the site more appropriately for particular user groups;
- 38.23 to compile and use statistical information about you and other users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc which we may use to develop, provide and improve the site and our products and services, including, subject to paragraphs 53 to 58 below, recommendations to users and tailoring information and content for users;
- 38.24 to compile, use, disclose and trade with non-personal statistical information about our users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc which we and/or our advertisers may use to develop, provide and improve the site and our products and services, including targeted advertising to user groups. Please note that the information referred to in this paragraph 38.23 is aggregate information about our users which has de-identified users' personal information such that it cannot be linked back to identify you. We will not disclose your identifiable personal information to anyone without your permission;
- 38.25 diagnose and deal with technical issues and customer support queries and other user queries, such as problems with our server, determine the optimal and fastest route for your device to use in connecting with our site, and administer, maintain and secure the site;
- 38.26 detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy policy;
- 38.27 comply with the law or with any legal process; and

38.28 other activities not specifically mentioned which are lawful, reasonable, relevant to our business activities, and the minimum necessary and adequate in order for us to provide the site, and our products and services.

39 We will get your permission before collecting or using your personal information for any other purpose.

Compulsory/optional information and consequences of not sharing it with us

40 Only the following information is compulsory: Your e-mail address and username. In order to access any of the value added services you will need to identify yourself as a MultiChoice subscriber with a SmartCard number of a living person (not a bot).

41 All other information is optional. If you do not agree to share your compulsory information with us, then you will not be able to make full use of the features that are offered to registered users. If you do not agree to share your optional information with us, then you may not be able to enjoy all of the site features and functionality.

Retention of your personal information

42 We retain all personal information which we collect from you (except for the information referred to in paragraph 43 below) unless there is a valid technical, legal or business reason for us to delete, destroy or de-identify it ("retained information").

43 We will not retain the following information if you ask us not to -

43.1 your contacts as contemplated in paragraph 32 above, unless that contact is a registered user on our site who has given us permission to store their information;

43.2 communications which we have sent on your behalf as contemplated in paragraph 32 above;

43.3 the content of your public communications via our site with site users or third parties for as long as the relevant site feature (e.g. a game) remains active.

In this situation, our site will prompt you with a "do not store" option. If you select "do not store" then we will use the relevant information temporarily for the required purpose and then delete, destroy or de-identify it. If you permit us to retain it, we will use it only in line with your permissions and, subject to paragraphs 48 to 50 below, we will not disclose it to any third party without your permission.

44 We may keep all retained information for as long as you continue to access our site and for three years thereafter. Subject to paragraph 45 below:

44.1 if you do not access our site for a consecutive period of two and a half years we will inform you that your account is dormant; and

44.2 if you do not access our site for a further six months after the dormancy notification, we will delete, destroy or de identify all your personal information from our records except for information which we store for historical, statistical or research purposes.

45 Notwithstanding paragraph 44 above and any other provision of this privacy policy, we may keep some or all of your personal information if and for as long as:

45.1 we are required by law, a code of conduct or a contract with you to keep it;

45.2 we reasonably need it for lawful purposes related to our functions and activities;

45.3 we reasonably need it for evidentiary purposes; or

45.4 you agree to us keeping it for a specified further period.

46 We store all retained information on our servers in South Africa. Please see paragraphs 59 to 61 below regarding our security measures.

Disclosure of your personal information

47 We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy policy or with your permission.

48 We may disclose your personal information to:

48.1 our affiliates;

48.2 our employees, contractors and agents if and to the extent that they need to know that information in order to process it for us and/or to provide services for or to us, such as site hosting, development and administration, technical support, financial services such as processing of payments, delivery services, marketing services (only in respect of our site, products and services) and other support services. We will authorise any information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions. Such persons may be disciplined, their contracts terminated or other appropriate action taken if they fail to meet their obligations;

48.3 in order to enforce or apply our terms of use or any other contract between you and us;

48.4 in order to protect our rights, property or safety or that of our customers, employees, contractors, agents and any other third party;

48.5 in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;

48.6 any third party who acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates, and/or our site, whether by sale, merger,

acquisition or otherwise, and/or to any third party from who we acquire (or propose to acquire) ownership or control of assets, shares or management, whether by purchase, merger, acquisition or otherwise;

48.7 governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:

48.7.1 comply with the law or with any legal process;

48.7.2 protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;

48.7.3 detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy policy;

48.7.4 protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

49 We may use your personal information to compile profiles for statistical purposes and may freely trade with such profiles and statistical data, provided that the profiles or statistical data cannot be linked back to you by a third party.

50 We will get your permission before disclosing your personal information to any third party for any other purpose.

Accuracy of your personal information

51 We are careful to ensure that your personal information is accurate, complete, not misleading, and up to date. Please let us know if, to your knowledge, any information we have about you is incorrect, incomplete, misleading or out of date, by notifying us at the contact details set out in paragraph 67 below. We will take reasonable steps to correct or update the relevant information accordingly having regard to the purpose for which the information was collected or used.

52 If you contest the accuracy of your personal information, we may elect to verify its accuracy and, if we do so, we may restrict the processing of the contested information for a reasonable period while we verify its accuracy.

Direct marketing

53 When you register on the site you may choose whether to receive marketing communications from us. You may also manage it in your privacy settings on our site.

54 You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing ("direct marketing communications").

55 You may opt out of receiving direct marketing communications from us:

55.1 at the time of registering on the site by ticking the relevant “opt-out” box; and

55.2 at any time by requesting us (in any manner, whether telephonically, electronically, in writing or in person) to desist from initiating any direct marketing to you.

56 If you have opted out in accordance with clause 55, we will:

56.1 send you written (which may include electronic writing) confirmation of receipt of your opt outrequest; and

56.2 not send you any further direct marketing communications.

57 You may (in terms of the Consumer Protection Act, 2008) register a pre-emptive block against direct marketing communications. If you do so, we will not send you direct marketing communications unless you have expressly consented to receiving direct marketing communications from us.

58 We will not send you direct marketing communications at home at any period during which it is prohibited by law to do so, unless you have expressly or implicitly requested or agreed otherwise.

Security

59 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information in the course of its transmission. Once we have received your information, we will store some of it on our servers and use strict procedures and security features to try to prevent unauthorised access to it.

60 We take reasonable technical and organisational measures to secure the integrity of retained information, using accepted technological standards to –

60.1 prevent unauthorised access to or disclosure of your personal information; and

60.2 protect your personal information from misuse, loss, alteration or destruction.

61 In particular:

61.1 We usually use encrypted SSL servers which are stored on our premises in Randburg, South Africa.

61.2 We require you to enter a password when logging in to our site.

61.3 We do not require your credit card details, Internet banking details or PIN numbers for any purpose. If we need to make a payment to you (e.g. if you win a prize), we will send you an e-

mail requesting your banking details and make payment directly into your chosen bank account. We will keep the payment records (for finance, recordkeeping and audit purposes) on secure servers. We will not disclose your banking details to any third party except to the extent necessary to process and record payments.

61.4 Where we allocate you or replace a password which enables you to access certain parts of our site, we will do so in an automated manner and we do not store it. You are responsible for keeping your password confidential. Please notify us immediately and change your password if you become aware that your password has or may have become compromised or accessed by an unauthorised person.

61.5 From time to time we review our information collection, storage and processing practices, including physical security measures, to keep up to date with best practice.

61.6 See paragraph 48.2 regarding measures to protect the information which is provided to employees, agents and contractors on a need-to-know basis.

61.7 We create a secure back-up for operational and safety purposes.

Linking to third party sites

62 We are not responsible for the privacy practices of a third party site to which there may be a link on our site or to which you may log in from our site (e.g. integrated social networking services).

63 We advise you to read the privacy policy of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

64 In certain instances we will give you the option to manage some of your privacy settings on integrated social networking sites from our sites (e.g. to enable you to determine which of your personal information you would like to share via our site).

Changes to this policy

65 We may change this privacy policy from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy policy (including, if we have your e mail address, e-mailing you notifications of the updated privacy policy).

What you can do to protect your personal information

66 People have different privacy concerns. Our goal is to be clear about what information we collect so that you can make meaningful choices about what you make available. For example, you may -

66.1 control who you share information with, on or via our site;

66.2 manage your privacy settings/permissions at the time of giving us your permission or at any time thereafter, by changing your settings by clicking on “My profile” on our site or on a relevant social networking site, or in any other manner which we make available on our site from time to time;

66.3 set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being sent by us (see paragraphs 18 to 21 above);

66.4 request us to indicate what personal information of yours we have on our systems;

66.5 request us to correct or update your personal information (see paragraphs 51 and 52 above) or to destroy or delete your personal information (subject to paragraph 45 above);

66.6 object to any unlawful processing of your personal information; and

66.7 refuse the processing of your personal information for direct marketing purposes (see paragraph 54 to 57 above).

Queries and complaints

67 If you have any comments, queries or complaints in relation to this privacy policy you are welcome to contact us at enquiries@multichoice.co.za or (011) 289 2222. Our business address is:

MultiChoice Africa Holdings BV and MultiChoice Operations (Pty) Ltd– 251 Oak Avenue,
Randburg, South Africa;

Electronic Media Network (Pty) Ltd and SuperSport International (Pty) Ltd- 131 Bram Fischer
Drive, Randburg, South Africa.

68 If you contact us we may ask you to verify your identity before we can act on your request.

69 Please note that we may reject requests that are vexatious or frivolous, unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or which would be disproportionately impractical to address.

Resolution of disputes

70 If we receive a complaint from you we will use our best endeavours to resolve it.

71 If we are unable to resolve a dispute between you and us concerning the interpretation or application of this privacy policy any party who wishes to pursue that dispute may, subject to this privacy policy, and without prejudice to any other remedy that such party may have, refer the dispute to arbitration in terms of the expedited rules of the Arbitration Foundation of Southern Africa.

72 Such arbitration proceedings must be conducted in Johannesburg in English.

73 The arbitration ruling will be final and the unsuccessful party will pay the costs of the successful party on an attorney and own client scale.