



PRIVACY POLICY

PayU Payment Solutions Proprietary Limited trading as PayU, registration number 2009/017393/07 (“**PayU**”, “**we**”, “**us**” or “**our**”) is committed to ensuring the protection of the privacy of all visitors (“**Visitors**”) to our website and any related mobi-sites or software applications which are accessible at www.payu.co.za (the “**Website**”), payment platform (“**Platform**”) and mobile application (“**App**”), as well as all persons (“**Customers**”) who have subscribed to any of the services we offer (“**Services**”), whether they be ‘PayU Wallet’ users (“**Wallet Users**”) or payment receivers (“**Merchants**”).

If you have questions or complaints regarding our privacy policy or practices, please contact us by telephone on +27 (0)86 111 7298 (PayU) for local calls or +27 21 468 7298 (PayU) for international/local calls or email us at support@payu.com. This privacy policy (“**this Policy**”) describes the ways in which we collect, store, use and protect the personal information of our Visitors and Customers. Throughout this Policy, we use the term “personal information” to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific person.

It is important that you read this this Policy with read with our Website Terms and any additional terms and conditions and policies incorporated in this Policy by reference. Each Wallet User and Merchant needs to accept all the provisions in this Policy when he/she/it signs up for any of our Services. If you do not agree with anything in this Policy, then you may not register and/or use any of the Services.

You may should not access the Website, App or Platform or use the Services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts. Unless we clearly state otherwise when providing certain Services, we do not have any intention of collecting or processing any personal information from individuals under 18 years of age.

By accepting this Policy, accessing our Website or using our Services, you are regarded as having read and agreed with this Policy

1 CHANGES TO PRIVACY POLICY

We may amend this Policy at any time by posting a revised version on our Website. The revised version will apply to Visitors with effect from the time we post it. However, as regards Customers, the following will apply:

- 1.1 we will provide Customers with at least 30 days’ prior notice of any such revision by posting notice of the change in the “Policy Updates” page of the Website and, subject to 1.2 below, the revision will then apply to Customers with effect from the date indicated in such notice, provided that if a Customer is not happy with the revisions made, he/she/it shall be entitled to terminate the Services subscribed for;
- 1.2 any revisions so made during the fixed initial period of any Service subscribed for by a Customer (if applicable) will only apply to such Customer after the expiry of such initial period.

2 GENERAL INFORMATION ABOUT EVERYONE

2.1 Types of Information we collect

As a Visitor, Wallet User or Merchant, you agree that we may electronically collect, store and use the following of your information for the purposes set out in clause 2.3 below:

- 2.1.1 internet usage information, including your Internet Protocol address (“**IP Address**”), browsing habits, click patterns, unique user ID, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the Website, App or Platform, and the dates and times that you visit the Website, App or Platform, paths taken, and time spent on sites and pages within the Website, App or Platform (“**Usage Details**”); and
- 2.1.2 additional information you may provide on a voluntary basis, such as demographic information or information related to your favourite social networking site (e.g. the site name, address and description), or information relating to your participation in competitions, promotions, surveys, and/or additional services (“**Optional Details**”).

2.2 How we collect such information

2.2.1 Voluntarily provided by you: Optional Details may be submitted by you to us if you decide to upload or download certain content (or products) from the Website, App or Platform, enter competitions, take advantage of promotions, respond to surveys, register and subscribe for certain additional services, or otherwise use the optional features and functionality of the Website, App or Platform.

2.2.2 Automatically gathered via various technologies:

2.2.2.1 **“Cookies” Information:** When you access the Website, App or Platform, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer to collect certain Usage Details. PayU may use both session cookies (which disappears after you close your browser) and persistent cookies (which remain after you close your browser which can be removed manually) and may be used by your browser on subsequent visits to the Website, App and Platform. Please note that the use of cookies is standard on the internet and many major websites use them. Please review your web browser “Help” file to learn more about modifying your cookie settings.

2.2.2.2 **Other tracking technology:** When you access the Website, App or Platform or open one of our HTML emails, certain Usage Details may be automatically collected and recorded by us from your system by using different types of tracking technology.

2.2.2.3 **Web Beacons:** Our Website may contain electronic image requests (called a “single-pixel gif” or “web beacon” request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Web beacons are typically 1-by-1 pixel files (so small that you would likely not realize that they are there), but their presence can usually be seen within a browser by clicking on “View” and then on “Source.” We may also include web beacons in HTML-formatted newsletters that

we send to opt-in subscribers in order to count how many newsletters have been read. PayU web beacons do not collect, gather, monitor or share any personally identifiable information about our Customers, they are just the technique we use to compile anonymous information about the Website and Service usage.

- 2.2.2.4 **From our affiliates:** We collect some personal information automatically from other divisions or companies (such as, for example, MultiChoice, or 24.com) within the group of companies to which we belong, being the Naspers Limited Group.

2.3 The purpose for which we collect this information

- 2.3.1 We may use any **Optional Details** provided by you for such purposes as indicated to you at the time you agree to provide such Optional Details.

- 2.3.2 We may use your **Usage Details** to:

- 2.3.2.1 automatically provide you with the latest version of the PayU application on your system;

- 2.3.2.2 remember your information so that you will not have to re-enter it during your visit or the next time you access the Website, App or Platform;

- 2.3.2.3 monitor aggregate Website usage metrics such as total number of visitors and pages accessed; and

- 2.3.2.4 track your entries, submissions, and status in any promotions or other activities in connection with your usage of the Website, App or Platform.

Please note: Some of our business partners (e.g. advertisers or platform providers) use their own cookies and/or widgets on our Website and PayU has no access to or control over such cookies or widgets. (Widgets are interactive mini-programs that run on our Website to provide specific services from another company (e.g. displaying the news, opinions, music, etc) and these widgets may collect certain of your personal information (e.g. your email address). Cookies may also be set by the widget to enable it to function properly.) Information collected by any such cookie or widget is governed by the privacy policy of the company that created it, and not by PayU. **This Policy covers the use of cookies by PayU only and does not cover the use of cookies or widgets by any third party advertisers or partners on the Website.**

- 2.3.2.5 We use information from our affiliates to supplement information you have provide to us, provide joint content and services like registration, transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services and communications.

3 INFORMATION ABOUT WALLET USERS

3.1 Types of information we collect about Wallet Users

If you are a Wallet User, you agree that we may also electronically collect, store and use the following of your information:

- 3.1.1 name and surname, birth date, identity number and/or passport number, gender, country of residence, and nationality (“**Personal Details**”);
- 3.1.2 e-mail address, mobile number, and credit card billing address (“**Contact Details**”);
- 3.1.3 the credit card number, cardholder name and expiration date you submit to PayU in respect of your credit card(s), in accordance with the Wallet User Agreement (“**Card Details**”);

3.2 How we collect information about Wallet Users

PayU collects the aforesaid information from you in the following manner:

- 3.2.1 **User-provided Information:** Your Personal Details, Contact Details and Card Details will be provided by you directly to us during your registration as a Wallet User and/or thereafter by your actively updating or supplementing such details in your Wallet User Account.
- 3.2.2 **Merchant-provided information:** During your registration as a Wallet User, we may collect from the person you wish to pay via the internet using the Services (such person hereinafter referred to as a “**Merchant**”), such of your Personal Details, Contact Details and/or Card Details as you may have already submitted to such Merchant, without you having to re-enter such information. However, prior to doing so, we shall notify you thereof and request your consent thereto.

3.3 The purposes for which PayU collects the information

PayU uses the information that Wallet Users provide (or that we collect) to operate, maintain, enhance, and provide all of the features of the Services, and as may be necessary to comply legally as a payment service provider. **More specifically:**

- 3.3.1 We use your **Card Details** in order to provide the Services (including the verification thereof when you transact with Merchants) and, should fees be charged for some of the Services and you have selected a credit card as your means of payment therefor, to debit such credit card for such fees owed by you.
- 3.3.2 We use your **Personal Details** to greet you when you access your Wallet User Account, to manage and administer your use of the Services and fulfil our contractual obligations, including by verifying your identity when you transact with a Merchant. We may also share your Personal Details with the platform provider via which you agreed to sign up for a PayU Wallet (for example, the WeChat wallet platform), even if such sign up occurred on our Website.
- 3.3.3 We use your **Contact Details** to verify your identity and to inform you of facts relating to your use of the Services (e.g. notifications regarding major updates or content you have posted or downloaded from the Website or Platform, customer service notifications, and to address copyright infringement or defamation issues) as well as to inform you, subject to obtaining your prior consent, of competitions, promotions and special offers from us and/or our partners and/or affiliates.

4 INFORMATION ABOUT MERCHANTS

4.1 Types of information we collect about Merchants

If you are a Merchant, you also agree that we may electronically collect, store and use the following of your information:

- 4.1.1 If you are an individual, your full name/s, birth date, identity number and/or passport number, gender, country of residence, and nationality (“**Personal Details**”);
- 4.1.2 If you are a legal entity, your full name, registration number, country of incorporation (“**Corporate Details**”), and the Personal Details of all your directors and/or office bearers;
- 4.1.3 e-mail address, mobile number, and such other contact details as provided in the Merchant Application Form (“**Contact Details**”);
- 4.1.4 your bank account details (“**Bank Account Details**”).

4.2 How we collect information about Merchants

You provide the aforesaid information directly to PayU in the Application Form you submit to PayU during your registration as a Merchant and thereafter should you actively update or supplement such details in your Merchant Account.

4.3 The purposes for which PayU collects the information

PayU uses the information that Merchants provide to operate, maintain, enhance, and provide all of the features and Services provided to Merchants and as may be necessary to comply legally as a payment service provider. **More specifically:**

- 4.3.1 We use your **Banking Details** and **Corporate Details** (or **Personal Details**, as the case may be) in order to provide the Services and fulfil our contractual obligations, including by verifying your identity and your bank account information when transaction with a Wallet User, the payment to you of funds due to you, or debiting of fees due by you.
- 4.3.2 We use your **Contact Details** to verify your identity and to inform you of facts relating to your use of the Services (e.g. notifications regarding scheduled system maintenance or downtime, major updates, customer service notifications, and to address copyright infringement or defamation issues) as well as to inform you, subject to obtaining your prior consent, of competitions, promotions and special offers from us and/or our partners and/or affiliates.

5 HOW WE PROTECT & STORE PERSONAL INFORMATION

- 5.1 We store and process the personal information of our Wallet Users, Merchants and Visitors on our computers in South Africa, and we protect it by maintaining physical, electronic and procedural safeguards in compliance with applicable Payment Card Industry Data Security Standards (PCI DSS). We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfil their job responsibilities.
- 5.2 You should not divulge your account password to anyone. **PayU will never ask you for your password in an unsolicited telephone call or e-mail.** YOU ARE RESPONSIBLE FOR MAINTAINING THE SECRECY OF YOUR UNIQUE PASSWORD AND ACCOUNT INFORMATION AT ALL TIMES.

5.3 If you are a legal entity and not an individual, we will liaise only with your named contact or alternative contact provided by your named contact. It is your responsibility to let us know of any changes to your named contact.

6 HOW WE SHARE PERSONAL INFORMATION WITH OTHERS

6.1 We may share your personal information with:

6.1.1 PayU Merchants, as described in clause 7 below, if you are a Wallet User;

6.1.2 the persons making payment to you, if you are a Merchant;

6.1.3 other divisions or companies (such as, for example, MultiChoice, or 24.com) within the group of companies to which we belong, being the Naspers Limited group of companies (www.naspers.com) which includes companies registered in countries other than South Africa, so as to provide joint content and services like registration, transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services and communications. Members of our corporate family will only use this information to send you marketing communications if you have requested their services;

6.1.4 service providers under contract who help with parts of our business operations (fraud prevention, bill collection, marketing, technology services). Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit;

6.1.5 financial institutions that we partner with to jointly create and offer products and services. These financial institutions may only use this information to market PayU-related products, unless you have given consent for other uses;

6.1.6 credit bureaus to report account information, as permitted by law;

6.1.7 banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the Services to receive payments and you meet their criteria);

6.1.8 companies that we plan to merge with or be acquired by. (Should such a combination occur, we will require that the new combined entity follow this Policy with respect to your personal information. If your personal information could be used contrary to this Policy, you will receive prior notice);

6.1.9 Law enforcement, government officials, fraud detection agencies or other third parties when –

6.1.9.1 we are compelled to do so by a subpoena, court order or similar legal procedure;

6.1.9.2 we need to do so to comply with any law; and/or

6.1.9.3 we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our User Agreement (if you are a Wallet user)our Website Terms, or our General Terms;

6.1.10 other third parties, with your consent or direction to do so.

- 6.2 PayU will not sell or rent any of your personal information to third parties for their marketing purposes and only shares your personal information with third parties as described in this Policy. Note however that if you open a PayU Account directly on a third party website or application, any information that you enter on that website or application (and not directly on our Website) will be shared with the owner of the third party website or application.

7 HOW WE SHARE WALLET USERS' PERSONAL INFORMATION WITH MERCHANTS

- 7.1 To process Wallet Users' Card payments, we may need to share the Card Details with the relevant Merchants to be paid.
- 7.2 If you are buying goods or services and pay through our Service, we may also provide the Merchant with your credit card billing address to help complete your transaction. The Merchant is not allowed to use this information to market their services to you unless you have agreed to it.
- 7.3 We work with Merchants to enable them to accept payments from you using the PayU Services. In doing so, a Merchant may share information about you with us (e.g. email address) when you attempt to pay that Merchant. We use this information to confirm to the Merchant that you are a Wallet User and that the Merchant should accept payment for your purchase via your PayU Wallet. Also, if you request that we validate your status as a Wallet User with a third party, we will do so.
- 7.4 Please note that Merchants you buy from and contract with have their own privacy policies, and PayU may not be held responsible for their operations, including, but not limited to, their information practices.

8 HOW TO ACCESS, CHANGE OR DELETE YOUR PERSONAL INFORMATION

- 8.1 You can review and edit any of your personal information at any time by signing in to your Account and clicking the **My Profile** menu in any of the PayU pages.
- 8.2 You also have the right to request access to your personal information, provided you provide us with proof of identity in a form acceptable to us. You may request that we (i) confirm, free of charge, whether or not we hold personal information about you; and (ii) provide you with record or a description of the personal information we hold about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information, and we will do this within a reasonable time; at a prescribed fee; in a reasonable manner and format; and in a form that is generally understandable.

8.3 Deleting your information:

- 8.3.1 Mobile App: Should you decide to delete your account/profile and related information from the App, you may do so by deleting the App from your device(s). You understand that by deleting the App, your profile/account details including any saved information, and any promotional offers received by you, will be no longer retrievable/accessible or editable by you. However, we make no representations or warranties that content or actions previously posted or embedded onto the App by you will be removed by a deletion of the App.
- 8.3.2 Website account: you may request that your account is deactivated by emailing us on support@payu.co.za.

- 8.3.3 **Please note:** Even after you have removed the App or requested that we deactivate your account on the Website, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, it was otherwise distributed pursuant to User's privacy settings, or it was copied or stored by other users, our merchants, and partners.

Certain information may be retained for legal purposes and will only be held for so long as required by applicable law. |

9 NON-PERSONAL INFORMATION

Notwithstanding anything contained in this Policy regarding your information, the following information is not regarded as personal information for purposes of this Policy:

- 9.1 Permanently de-identified information that does not relate and/or cannot be traced back to you specifically. We may compile, use, share and otherwise process such information as we deem fit.
- 9.2 Non-personal statistical information collected and compiled by us. We own and retain all rights in such information.
- 9.3 Information which you have provided voluntarily in an open, public environment or forum including (without limitation) any blog, chat room, albums, community, classifieds or discussion board. Because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this Policy. Since such public environments are accessible by third parties, it is possible that third parties may collect and collate and use such information for their own purposes and you should accordingly be careful when deciding to share any of your personal information in such public environments.

10 YOUR CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION

By accepting this Policy, you consent to our collection, storage, processing and disclosure of your personal information as described in this Policy, for so long as you are a registered Customer of our Services. Should you terminate your registration with us and close your Account, you consent to our retention of the information we have already collected from you for record-keeping purposes only in accordance with applicable law.

11 HOW YOU CAN CONTACT US ABOUT PRIVACY RELATED QUESTIONS

If you have questions or concerns regarding this Policy, or you are aware that a minor under the age of 13 has provided us with personal information, you should contact us by using the [contact us](#) link in any of the PayU pages or phoning us on +27 (0)86 111 7298 (PayU) for local calls or +27 21 468 7298 (PayU) for international/local calls or mailing us at 5th Floor, The Pinnacle, Corner Strand, Burg and Castle Streets, , Cape Town, 8001, South Africa, or via our postal address PO Box 2434, Cape Town, 8000, South Africa or via email at support@payu.co.za.