



DATA PROTECTION & PRIVACY POLICY - SOUTH AFRICA

This privacy notice sets out what personal information we collect from you when you use and/or are displayed on the Oval15 Platform (which could be our online platform, 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 other related matters.

This policy must be read in conjunction with our Terms and Conditions which are available when registering on the Platform. Any word capitalized but not defined herein, shall have the meaning ascribed to it under the Terms and Conditions or POPI, as the context may require.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY to understand our practices regarding your personal information and how we will treat and maintain it.

1. Introduction

- 1.1 OVAL15 (Pty) Limited ("**Oval15**"), operates subject to laws of the Republic of South Africa. We are located at 2 Stewart Drive, Berea, East London, Eastern Cape 5241, Republic of South Africa.
- 1.2 Oval15 is the controller of **Personal Information** (used interchangeably with "**Personal Data**") as described in the Protection of Personal Information, Act 4 of 2013 ("**POPI**") and is also a "**Responsible Party**" for purposes of POPI. The processing of such Personal Information is described in this Privacy Policy.
- 1.3 Oval15 takes your privacy very seriously. We strive to ensure that our use of your Personal Data is lawful and reasonable, with the ultimate goal being the improvement of our services and the enhancement of your viewing experience.
- 1.4 All Personal Data collected and stored by Oval15 will be processed in accordance with the requirements of both local Privacy Laws, including POPI (applicable in South Africa) and international Privacy Laws including, the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**")
- 1.5 The provision of privacy, protection of Personal Information, and data protection in terms of international and transborder use shall be regulated in accordance with both local and international Privacy Laws.
- 1.6 This Privacy Policy describes how your Personal Data is processed at Oval15 when you use the Platform and Services, including when you are not registered or signed-in to our Platforms.

- 1.7 We also provide some ways for you to exercise control over your Personal Data, and to contact us if you have questions.
- 1.8 We encourage you to read this policy completely so that you understand how we rely on Personal Data to create the best possible experience for you. We also use this policy to call your attention to the information about Cookies that help power our offerings from a technical perspective.
- 1.9 Should you have any questions regarding the processing of Personal Data by Oval15, you can contact us at admin@oval15.com.
- 1.10 Unless stated otherwise, defined terms have the meaning given to them in the Oval15 Terms and Conditions, which can be accessed when registering for the Platform, or a copy can be requested from us at the email above.

2. What Personal Data do we collect?

- 2.1 **Overview:** We may receive and collect Personal Data about you in several ways, whether we have asked for the information or not including when you sign up to use the Oval15 Platform and make use of our Services or you submit your Personal Data to us for any other reason. We may also receive Personal Data from third parties that have obtained it from you and that are permitted to share it with us. It does not apply to any other company or organisation, including those whose digital services that have links to Oval15's content or Services. Third party services which have links to Oval15's content or Services will govern the use of Personal Data you submit to them. This information may also be collected by Cookies when you visit or use the Platform. We do not accept any responsibility or liability for the privacy practices of such third-party digital services.
- 2.2 **Categories of Personal Data when you are signed into the Oval15 Platform:** The categories of Personal Data of signed-in users that we collect include:
 - 2.2.1 **Basic Account and Contact Information:** You may be required to provide an email address and password to create a Oval15 account, in addition to other biographical information such as your name and surname, mobile number, weight and height;
 - 2.2.2 **User profile and other information:** We also collect and process certain information on your activity on the Oval15 Platforms such as for **example:** information about your Oval15 account (including information that you provide to update your account following registration), rugby playing experience and qualifications, and any other information provided by you to us to enable us to assess your suitability as a rugby player;
 - 2.2.3 **Cookies:** We may also store certain information collected via the use of cookies, web beacons, advertising IDs and other technologies, including ad data. For more information on cookies please refer to the Cookies section of this Privacy Policy;
 - 2.2.4 **Device and Browser Information:** When you access the Platform, we may also collect information about the device or browser accessing the Oval15 Platform, such as unique device identifiers, IP address, type, model, settings, operating system, system activity and crash reports for your device and browser, such as unique device identifiers, the type of device used to access the Oval15 Platform,

hardware model and settings, operating system, browser type, language, system activity, and crash reports;

2.2.5 **Location Information:** When you access the Platform, based on your IP address, we may determine the geographical location of a device used to access the Platform based on your IP address, however, such information determined does not go beyond the level of region. In addition, Oval15 does not use GPS geolocation and does not collect geolocation data;

2.2.6 **Categories of data when you are not signed in to Oval15 Platforms:** The categories of Personal Data of that we may collect when you are browsing the Oval15 Website or the Oval15 App without signing in include data referred to in the following sections: on Events (2.2.3), Cookies (2.2.5), Device and Browser Information (2.2.6) and Location Information (2.2.7);

2.2.7 **Children's' data:** Oval15 expressly records and acknowledges that Personal Information of Children and Special Personal Information are applicable in terms of POPI. Where Oval15 collects and stores Personal Information of Children it does so after having received the necessary Consent from a Competent Person, as required by the relevant provisions of POPI. Users of the Platform must be at least 18 years of age, or the age of majority in the relevant jurisdiction, or older to create an account. While individuals under the age of 18 may use the Platform, they may do so only under the supervision of a parent or a guardian, with the minimum age being set at 17 years old; and

2.2.8 **Voluntary provision of data:** The provision of your Personal Data is voluntary but necessary to use some of the Services offered by Oval15. Refusal to provide some of your Personal Data will make it impossible to use the Oval15 Platforms or some of their functionalities, and will prevent Oval15 from offering and performing such Services.

3. For what purposes do we process Personal Data?

3.1 **Overview:** We use the information we receive and collect generally for the purpose of providing, promoting, maintaining, personalising and improving our Services, to develop new services, and to protect Oval15, our Platform, and our users from fraudulent or illegal activity.

4. Purposes

4.1 Specific purposes for which we process your data include:

4.1.1 processing Personal Data necessary for the purposes of conclusion and performance of the Agreement with you, including:

4.1.2 to establish, personalise and maintain your Oval15 account, and to authenticate your identity when accessing your Oval15 account, and to settle payments;

4.1.3 to provide you with a unique selection of playing opportunities exclusively for you based upon interest from both domestic and international clubs;

4.1.4 to provide support services and to communicate with you, including to inform you about any changes to Oval15's Services; and

4.1.5 processing of Personal Data in order to fulfil obligations resulting from provisions of applicable laws;

- 4.1.6 to fulfil any contractual obligations with our business partners for the purpose of offering the Oval15 Platform and for the purposes of financial settlements connected thereto, which is our legitimate interest for processing Personal Data;
- 4.1.7 processing of Personal Data for marketing of the Oval15 Platform, including through advertising tailored for individual or group needs and preferences, for example online advertising, which is our legitimate interest for processing Personal Data;
- 4.1.8 processing for the purposes of research, analytics, development, improvement (including user experience improvement), administration, maintenance, technical support and security of the Oval15 Platform which is our legitimate interest for processing Personal Data;
- 4.1.9 processing for the purposes of establishment, exercise and defence of legal claims, enforcing or investigating potential violations of our terms of use or any other actual or alleged fraudulent activities, protecting rights, property or safety of Oval15, our customers, employees and other third parties, which is our legitimate interest for processing Personal Data; and
- 4.1.10 processing for the purposes of reorganisation of the Oval15 group, including changes in ownership or control of assets, shares or management of Oval15, or that of our affiliates, which is our legitimate interest for processing Personal Data.

5. Who are the recipients of Personal Data?

- 5.1 Your Personal Data may be disclosed to the following categories of recipients:
 - 5.1.1 Oval15 affiliates, which includes any holding companies, subsidiaries and entities that control or are under common control with Oval15, in particular when necessary for the ongoing maintenance and continued provision of the Services to you;
 - 5.1.2 Trusted service providers retained by us to enhance or provide Services to you, acting at our instruction, including hosting services providers, platform development, support and security services providers, analytics tools and services providers, customer support services providers, payment and reconciliation services providers;
 - 5.1.3 marketing services providers supporting us in promoting the Oval15 Platform, including marketing agencies, suppliers and stakeholders, email distribution and other marketing tools providers, social media marketing services providers including Facebook and Google, as well as analytics services providers. Some Oval15 Platform features may be integrated with external services, including social media networks. This may mean that information, for instance about your interests and activities, is tracked or extracted from other platforms (such as Facebook). If you are signed in to Oval15's Platform that is integrated with other media tools, this information may be available to others depending on the privacy settings you have in place on these other platforms.
 - 5.1.4 The number and nature of social media platforms is changing rapidly, and the way in which information is shared between them is becoming increasingly complex. To help you manage and protect your Personal Data, Oval15 will ask you to opt-in before making your Personal Data available through an integrated service. You may also opt-out of your participation in most of Oval15's digital services. However, you should be aware that Oval15 may continue to store Personal Data provided by you prior to you opting-out.
 - 5.1.5 Your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party;
 - 5.1.6 Partners who may offer access to the Oval15 Platform on our behalf and/or partners with whom Oval15 co-operates with respect to enabling the Services on their platforms;

- 5.1.7 Third parties, including governmental bodies, courts or bodies of similar nature, when it is required in order to comply with applicable laws, to enforce or investigate potential violations of our terms of use or any other contract between you and us, to protect our rights, property or safety or that of our customers, employees, and other third parties; and/or
 - 5.1.8 Third parties in relation to reorganisation of the Oval15 group, in particular a third party that acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates by any means, or a third party from whom we acquire, ownership or control of assets, shares or management.
- 5.2 Please note that Oval15 offers services in jurisdictions located outside of South Africa and also outside of the European Economic Area. Some of the data recipients may be located outside the European Economic Area, in countries with respect to which the European Commission has not issued an adequacy decision (“**Third Country**”).
- 5.3 Where Personal Data is transferred to a Third Country, Oval15 takes legally required steps consistent with applicable European data protection legislation to ensure that the Personal Data is adequately protected in each such jurisdiction in particular by basing agreements with the relevant data recipients on the standard data protection clauses adopted by the European Commission or adopted by a supervisory authority and approved by the European Commission.

6. What are your rights?

- 6.1 Your data subject rights. You have the following rights with respect to your Personal Data processed by Oval15:
- 6.1.1 **Access:** You have the right to access your Personal Data;
 - 6.1.2 **Rectification:** You can ask us via email to have inaccurate Personal Data amended. You can also use the relevant section on the Oval15 Platform to change basic information about you;
 - 6.1.3 **Erasure:** You can ask us to erase Personal Data. Note that we will keep only Personal Data that is necessary for us to comply with financial and tax regulations and for the establishment, exercise or defense of legal claims;
 - 6.1.4 **Object to marketing:** You can object to processing your Personal Data for marketing purposes;
 - 6.1.5 **Object to other processing:** You can object to processing of your Personal Data based on the legitimate interest of Oval15 unless we have a valid ground to continue processing the data;
 - 6.1.6 **Portability:** You can ask us to receive your Personal Data that you provided to Oval15 in machine-readable format or have such data transmitted to a third party; and
 - 6.1.7 **Restriction:** We may be required to have your data restricted for processing in certain circumstances as defined in article 19 of the GDPR or POPI.
 - 6.1.8 **Exercise of your rights.** You can exercise your rights and lodge requests to Oval15 using the relevant chatbot feature of the Platform or contacting us via email.

- 6.2 **Exercise of your objection to marketing:** You may object to direct email marketing communications from us by indicating your communications preference on the Platform. You may also unsubscribe using the link included in every direct email marketing communication, it may take few days for this request to be processed. You cannot unsubscribe from service administration related emails. Please also see clause 10 – Cookies.
- 6.3 **Withdrawal of consent:** In some situations, we may seek your consent for processing. In such case, you will have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal.
- 6.4 **Support center:** Should you have any difficulties with exercising any of the rights referred to above using your Oval15 account, you may contact us at admin@oval15.com for assistance (in such case, for security reasons you may be asked to confirm your request by logging into your Oval15 account and upon such confirmation your request will be considered to be validly filed).
- 6.5 **Complaints:** You can raise a complaint about our processing with the data protection regulator in your jurisdiction. If you find it difficult to contact the data protection regulator, we will help you.

7. How long do we store data?

- 7.1 **Data Retention Principles:** We process your Personal Data during your subscription and following the end of your subscription to the extent that the data is necessary for the purposes with respect to which we are permitted and/or required to process data, in any event no longer than for the period of expiry of claims, including for the following purposes:
- 7.1.1 compliance with obligations resulting from applicable laws to which Oval15 is subject;
 - 7.1.2 establishment, exercise or defence of legal claims as well as for the purposes of any other legal proceedings or compliance with any judgments and/or decisions issued by public authorities;
 - 7.1.3 research and analytics;
 - 7.1.4 marketing of Oval15 Services; and
 - 7.1.5 maintaining your Oval15 account in accordance with clause 6.2.
- 7.2 **Access to your Oval15 Account after Registered User or Subscriber account termination:** Following the termination of your subscription, your Oval15 account will remain active, but unable to be utilized, for a period of six (6) months. If you do not re-subscribe to the Oval15 Platform within that time, we will delete your Oval15 account and any related information to the extent that it is not used as set out in clause 6.1.
- 7.3 **Data retention Principles with respect to consent:** As outlined in clause 5.3 we might be processing your data on the basis of consent. In such event we process data only as long as the consent is valid and to the extent that the data is necessary for the purposes with respect to which we are permitted and/or required to process data.
- 7.4 Where appropriate, we will encrypt, pseudonymise, anonymise and/or segregate information so that we may make use of it in a manner that avoids unnecessary identification, in the interest of protecting your privacy and enhancing security practices.

8. Security

- 8.1 Maintaining the security and integrity of your Personal Data is a high priority and we endeavour to maintain appropriate technical and organisational measures to secure the integrity of information, using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Data and to protect them from misuse, loss, alteration or destruction.

9. Direct marketing

- 9.1 We may send you notices and direct email marketing from time to time about playing opportunities on which we may think will be relevant to you, in relation to Oval15 or its affiliates, including any marketing, offers or information from Oval15 suppliers, marketing agencies and stakeholders not necessarily related to the Oval15 Platform, but which may directly or indirectly enable/facilitate the Services.
- 9.2 We may send you notices from time to time about marketing offers, newsletters or other information which we may think will be relevant or interesting to you.
- 9.3 You may unsubscribe from these communications at any time, by following the unsubscribe link in the communication.
- 9.4 You can also contact us on the details provided for assistance in unsubscribing from direct marketing communications.

10. Cookies

- 10.1 In order to ensure that the Oval15 Platform works properly, to provide you with a professional experience, we and certain of our third-party service providers may set cookies or similar technologies (such as in particular web beacons, pixels and advertising identifiers) on your device, subject to your consent where relevant. A cookie is a small text file that a website saves on your computer or mobile device when you visit the website. It enables the website to remember your actions and preferences (such as session status, language, font size and other display preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.
- 10.2 The Oval15 Platform uses two basic cookie types: session cookies and persistent cookies. Session cookies are temporary files stored on the user's end device until the user logs out, leaves the website or closes the software (web browser). Persistent cookies are stored on the user's end device for the time specified in the parameters of the cookies or until deleted by the user.
- 10.3 In many cases, the default settings of the web browsing software (web browser) enable cookie storage on the user's end device. You can delete or block cookies from being set in your web browser settings or relevant software. Cookies set by Oval15 will likely be labelled as first party cookies, and those set by our partners will be labelled third party cookies. Certain parts of the Oval15 Platform may not work properly if first party cookies are blocked or deleted.
- 10.4 The types of cookies and the purposes for which they are used on the Oval15 Platform include:

- 10.4.1 strictly necessary cookies, which enable use of the services available on the Oval15 Platform, for example cookies used for authentication of users and cookies that ensure security;
- 10.4.2 performance cookies, which help us collect information about how the Oval15 Platform is used, so that we can perform analytics and improve its performance;
- 10.4.3 functionality cookies, which remember choices made by the user and personalise the interface and allow enhanced functionality and personalisation of the Oval15 Platform; and
- 10.4.4 targeting cookies and advertising IDs for delivering adverts more relevant to users and their interests, as well as ad conversion tracking; these cookies are mainly set by our advertising partners.
- 10.4.5 Third parties that engage in online behavioural advertising, or that provide such services to us as service providers, may offer additional control over this practice via a self-regulatory body called the European Interactive Digital Advertising Alliance. For further details regarding the collection of information by third-party advertising companies or to exercise choices over online behavioural advertising practices, visit <https://youronlinechoices.eu/>.

11. Changes to this Policy and final provisions

- 11.1 We may change this Privacy Policy from time to time. If we do so, we will post the revised policy on the Oval15 website and will inform users of such amendments and of their effective date.
- 11.2 In case of discrepancy between this document and the Terms and Conditions, the provisions of this Privacy Policy will prevail.
- 11.3 This version of Privacy Policy applies from **1 August 2024**.