



POPIA – Customer Privacy Notice

1. HUGE TNS'S PRIVACY COMMITMENT TO ITS CUSTOMERS

- 1.1. Huger TNS Pty Ltd respects the privacy and confidentiality of Personal Information of its customers as well as any other natural and/or juristic person interacting with Huger TNS.
- 1.2. Huger TNS is therefore committed to comply with all data protection legislation in South Africa, in particular the Protection of Personal Information Act, 4, 2013 (herein after referred to as the POPIA)
- 1.3. Huger TNS has developed this Customer Privacy Notice to assist you (Huger TNS customers, users of Huger TNS's website and persons communicating with Huger TNS by means of telephone or email enquiries) to understand how Huger TNS obtain, use and disclose your Personal Information (herein after referred to as PI) in compliance with the POPIA's requirements.

2. YOUR CONSENT TO THE PROCESSING OF YOUR PI:

- 2.1. This Customer Privacy Notice forms an integral part Huger TNS's Services Agreement including the Standard Terms and Conditions published on www.hugentns.com
- 2.2. By submitting your PI to Huger TNS, you will be deemed to have given consent to the processing of your PI as set out in this Notice.
- 2.3. If you do not agree with these terms, Huger TNS will not be able to enter into an agreement with you and also respectfully request that you do not provide any Personal Information by means of a web enquiry through Huger TNS's website or otherwise to Huger TNS.

3. WHAT IS PERSONAL INFORMATION?

- 3.1. PI is defined in POPIA, and encompasses any information which identifies you as an individual, and includes information such as your name, identity number, postal and street address, email address, telephone number, credit vetting and payment history and can also include as per POPIA:
 - 3.1.1. Information relating a person's race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth,

- 3.1.2. Information relating to a person's education or medial, *financial*, criminal or employment history,
- 3.1.3. Any identifying number symbol such as *cell phone number, banking account number, handset code, e-mail address, physical address, telephone number, location information, online identifier*, or other assignment to the person,
- 3.1.4. A person's biometric information,
- 3.1.5. A person's personal opinions, views, or preferences,
- 3.1.6. Correspondence sent by a person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; and
- 3.1.7. The views of opinions of another individual about the person.

4. WHY AND HOW WE COLLECT YOUR PI?

- 4.1. Huge TNS collects PI directly from you where you provide us with your personal details, for example:
 - 4.1.1. when you enter into an agreement with Huge TNS for the provisioning of a Huge TNS products or services,
 - 4.1.2. when you submit enquiries to us or contact us by telephone, email, or web enquiry.
- 4.2. We also collect PI indirectly or from third parties, which include without limitation:
 - 4.2.1. Information provided by Business Partners who have concluded an agreement with Huge TNS for the purposes of marketing its products and services,
 - 4.2.2. From the use of our services and products,
 - 4.2.3. Information from credit bureaus, or
 - 4.2.4. Information from individuals/directors whom you have appointed as your representative, where you are a corporate entity.
- 4.3. Huge TNS will only collect your personal information from other sources where we are legally entitled or obliged to do so.
- 4.4. You are entitled to ask Huge TNS which sources we have used to collect your PI, where you have not provided the PI directly to Huge TNS.
- 4.5. The type and nature of the information we collect will depend on the purpose for which it is collected and used.
- 4.6. The purpose of the collection of the PI will be evident from the context within which the PI is collected, but specifically include the following:
 - 4.6.1. To enter into an agreement with you for the provisioning of Huge TNS

products and services,

- 4.6.2. To respond to enquiries and queries made by you,
 - 4.6.3. To improve on Huge TNS product and service offerings,
 - 4.6.4. To comply with specific statutory reporting requirements,
 - 4.6.5. To protect your or Huge TNS's legitimate interests or legal rights.
- 4.7. Where possible, you will be informed regarding what information you are mandated to provide to us and what information is optional, as well as the consequences where mandated information is not provided.

5. HOW AND WHAT WE USE YOUR PI FOR?

- 5.1. The term used for collection and use of PI in the POPIA is "processing". Processing includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying, or disposing of personal information.
- 5.2. The purposes of the initial collection of your PI are set out above in broad terms.
- 5.3. Huge TNS shall only further process your PI where the further processing does not conflict with the original purpose for which your PI has been collected and only where the POPIA allows such further processing. This includes inter alia the following:
- 5.3.1. To protect the integrity of the electronic communications network and systems of Huge TNS and other network operators, with whom Huge TNS has contracted, to ensure the constant availability of such systems and networks.
 - 5.3.2. This also includes fraud prevention and detection, information security and privacy incidents etc,
 - 5.3.3. To understand how Huge TNS's products and services are used to enable Huge TNS to develop relevant products and services that meet the personal needs of Huge TNS's customers,
 - 5.3.4. To share information with third parties, where such third parties are involved in the provisioning of Huge TNS's products and services - this might even include third parties in another country.
 - 5.3.4.1. Huge TNS shall however only share your PI with third parties where Huge TNS has a contractual commitment that the mentioned third parties have adequate PI protection safeguards in place and are subject to similar data protection laws as those that apply in South Africa.
 - 5.3.5. To do debt recovery,
 - 5.3.6. To send you promotional materials or details by SMS, e-mail, or post, regarding products and services which may be of interest to you.

- 5.3.6.1. This will only be done with your consent or where you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within a reasonable time frame,
 - 5.3.6.2. You can opt out of receiving communications from us at any time.
 - 5.3.6.3. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.
 - 5.3.6.4. Provided that you have consented, Huge TNS may send you information about other companies' products and services, where we think this may interest you.
- 5.3.7. For historical, research or statistical purposes, but Huge TNS will ensure that the outcomes of such processing are not published in a manner where any of your PI is in an identifiable format.

6. FOR HOW LONG WILL YOUR PI BE RETAINED?

- 6.1. We collect your PI for a specific purpose and will not keep it for longer than is necessary to fulfil that purpose, unless Huge TNS is obliged to keep it for legitimate business reasons or as per statutory requirements.

7. WHAT RIGHTS AND OBLIGATIONS DO YOU HAVE??

- 7.1. You have the following rights and duties regarding your PI:
 - 7.1.1. To access your PI that Huge TNS has on record.
 - 7.1.2. To request Huge TNS to correct any of your PI that is outdated or incorrect.
 - 7.1.3. To lodge a request with Huge TNS to delete or destroy your PI or object to Huge TNS processing your PI.
- 7.2. These requests must be sent to Huge TNS in writing and the forms that have to be used to lodge such a request are published on our website www.hugetns.com or is available on the Human Rights Commissions website
- 7.3. The consequence of such a request may be that Huge TNS may have to suspend service provisioning to you for a period or terminate the agreement that Huge TNS has with you.
- 7.4. You also need to note that certain information/records are subject to statutory retention periods, which means that Huge TNS may not be able to delete or destroy your PI upon request.
- 7.5. Requests to Huge TNS to access, update, correct, delete, destruct or limit the processing of your PI must be done by completing the Forms mentioned in clause 7.2

above and e-mailing it to the Information Officer whose details are on the Form.

- 7.6. Huge TNS will take all reasonable steps to confirm your identity before providing details of your PI.
- 7.7. Also please note that any access request may be subject to a payment of a legally allowable fee, as laid down in our POPIA Policy, published on our website www.hugetns.com or available at offices.

8. WILL YOUR PI BE PROTECTED?

- 8.1. Huge TNS is legally obliged to provide adequate protection and safeguards for the PI that we hold.
- 8.2. Huge TNS commits to implement technological and physical controls to prevent unauthorised access and use, damage to and destruction of your PI, in line with industry practices and standards.
- 8.3. Huge TNS will, on an on-going basis, review its security controls and related processes to ensure that your PI is secure and safeguarded.

9. CHANGES TO THE STATEMENT

- 9.1. Huge TNS reserves the right to amend this Customer Privacy Notice at any time, without prior notice, by posting the amended Notice on Huge TNS's website, i.e. www.hugetns.com/privacy .

Approved by the Information Officer of Huge TNS Pty Ltd.

Date of publication.....

ANNEXURE A: PERSONAL INFORMATION REQUEST FORM

**PERSONAL INFORMATION
REQUEST FORM**

Please submit the completed form to the Information Officer:

Name	
Contact Number	
Email Address:	

Please Note that Huge TNS requires proof of identification prior to processing your request.

There may also be a reasonable charge for providing copies of the information requested.

A. Particulars of Data Subject

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Request

I request Huge TNS to:

(a) Inform me whether it holds any of my personal information	<input type="checkbox"/>
(b) Provide me with a record or description of my personal information	<input type="checkbox"/>
(c) Correct or update my personal information	<input type="checkbox"/>
(d) Destroy or delete a record of my personal information	<input type="checkbox"/>

C. Instructions

D. Signature Page

Signature
Date



We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please Note that Huge TNS requires proof of identification prior to processing your request.

Please submit your complaint to the Information Officer:	
Name	
Contact Number	
Email Address:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator: Ms Mmamoroke Mphelo

Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Email: inforreg@justice.gov.za

Website: <http://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant	
Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
B. Details of Complaint	
C. Desired Outcome	
D. Signature Page	
Signature:	
Date	