



Gondwana Plus (Pty) Ltd t/a Sebenza

Sebenza Privacy Policy / Privacy Notice

1. Introduction

This Privacy Policy / Privacy Notice (“**Privacy Policy**”) explains how Sebenza collects, uses, stores, shares and otherwise processes personal information when you interact with Sebenza’s website, captive portal, commuter connectivity platform, engagement features, rewards features, and related services.

This Privacy Policy is intended to help you understand:

- What information Sebenza collects;
- How Sebenza collects it;
- Why Sebenza uses it;
- When Sebenza shares it;
- How long Sebenza keeps it;
- What choices and rights you have; and
- How to contact Sebenza about privacy matters.

This Privacy Policy applies together with any other notices, terms, rules or disclosures made available to you from time to time, including:

- Sebenza’s Platform Terms of Use;
- Sebenza Bucks Terms, where rewards or redemption features apply;
- Any legal disclosures made available in relation to electronic transactions or redemption features; and
- Any point-of-collection or feature-specific notices shown to you at registration, login, verification, survey, lead-capture, redirect or similar stages.

This Privacy Policy is Sebenza’s main full-form privacy notice. It does not replace shorter notices or disclosures shown to you at specific collection or interaction points on the Platform.

2. Who Sebenza Is and How the Platform Works

Sebenza operates a commuter connectivity, engagement and rewards platform.

Depending on the context, location, campaign, feature availability and your interaction with the Platform, Sebenza’s services may include:

- Website and captive portal access;
- Wi-Fi and connectivity-related access features;
- Account registration, login and verification features;
- Profile and engagement features;
- Advertising, promotional and branded content;
- Surveys, questionnaires and insight-gathering features;
- Rewards and redemption features, including Sebenza Bucks;
- Lead-generation forms and offer interactions; and
- Links, redirects or interactions involving third-party offers or services.



Sebenza's platform is built around a value-exchange model in which users may access connectivity-related services and engagement features, participate in content, surveys and campaigns, and earn or redeem rewards, depending on the feature and applicable terms.

3. Who and What This Privacy Policy Covers

This Privacy Policy applies to personal information relating to:

- Visitors to Sebenza's website;
- Users who enter the captive portal or Wi-Fi access environment;
- Registered or recognised platform users;
- Users who verify a mobile number or create an account;
- Users who complete profiles or preferences;
- Users who engage with content, campaigns, promotions or surveys;
- Users who earn, hold or redeem Sebenza Bucks;
- Users who submit details in response to a third-party offer or lead-generation opportunity; and
- Users who interact with Sebenza through support, complaints or other communications.

This Privacy Policy is aimed primarily at the user-facing Sebenza environment. If Sebenza has separate privacy notices for employees, suppliers, business customers or other categories of stakeholders, those may apply separately.

4. The Information We Collect

Sebenza may collect different categories of personal information depending on how you interact with the Platform.

4.1 Information You Give Us Directly

This may include:

- Your mobile number;
- Your name and surname;
- Your date of birth or age-related information;
- Your Identity Number;
- Your gender;
- Profile information you choose to provide;
- Contact details such as your email address;
- Details you submit through forms, surveys, questionnaires, promotions or competitions;
- Lead information you choose to provide in response to an offer, such as your name, email address and phone number;
- Marketing or communications preferences; and
- Support, complaint or query information.

4.2 Information We Collect When You Use The Platform

This may include:

- Account registration, login and verification information;
- Session, device or platform interaction information;
- Location, of your engagement on the platform;
- Information about how you engage with platform features;
- Records of surveys, forms, promotions, rewards or offers you interact with;
- Sebenza Bucks accrual, redemption and related account records; and
- Platform usage logs relevant to security, administration and fraud prevention.



4.3 Information We Generate or Infer

Sebenza may generate or infer information from your use of the Platform, including:

- Account status or eligibility status;
- Segment or audience grouping information;
- Engagement indicators;
- Campaign interaction signals; and
- Behavioural or audience insights derived from platform activity.

4.4 Information From Service Providers or Third parties

Sebenza may receive limited information from service providers or other third parties who support verification, hosting, communications, security, analytics, campaign administration, rewards functionality or other platform operations.

Sebenza may also receive information relating to a redirect or external interaction where this is necessary for campaign administration, audit, fraud prevention, support, compliance or similar purposes.

Quick guide to the types of information we talk about in this Privacy Policy

To make this Privacy Policy easier to understand, Sebenza generally works with the following broad types of information:

Information you give us directly

This is information you actively provide, such as your mobile number, name, profile details, survey answers, lead details or preferences.

Information we collect when you use the Platform

This is information created by your use of the website, captive portal, account, rewards features, surveys, campaigns or other platform functions.

Information we generate or infer

This is information Sebenza develops from platform activity, such as engagement indicators, audience segments, profile completeness, account status or similar insights.

Aggregated or de-identified information

This is information that has been grouped, anonymised, de-linked or otherwise processed so that it is not used to identify you directly.

5. Special Personal Information and Younger Users

Sebenza does not intentionally collect special personal information unless:

- A lawful basis exists to do so;
- The collection is clearly explained; and
- An appropriate notice, permission or other lawful mechanism is used where required.

Sebenza does not intend to collect special personal information simply as part of ordinary platform access.

Where a survey, campaign, research or other feature may involve higher-risk or more sensitive categories of information, Sebenza may use more specific notices, more limited question sets, or more specific permissions.



Certain platform features, offers or campaigns may be limited based on age or eligibility. Where Sebenza permits access by younger users to general platform features, specific content, advertisements, offers or interactions may still be restricted or excluded.

6. How We Collect Information

Sebenza may collect personal information:

- Directly from you when you visit the website;
- When you submit an enquiry or complete a form;
- When you enter or use the captive portal or Wi-Fi environment;
- When you register, log in, verify your number or activate an account;
- When you complete or update your profile;
- When you interact with content, advertisements, campaigns or promotions;
- When you participate in a survey, questionnaire, competition or similar engagement feature;
- When you earn, hold or redeem Sebenza Bucks;
- When you submit your details in response to a lead-generation or third-party offer;
- When you contact Sebenza for support or complaints;
- Through cookies, tracking technologies or similar tools where these are used; and
- From service providers or other third parties supporting Sebenza's platform operations.

7. Why We Use Your Information

Sebenza uses personal information for different reasons depending on how you interact with the Platform.

7.1 Core platform, access and account management

Sebenza uses personal information to:

- Register and manage user accounts;
- Verify and recognise users;
- Provide access to the Platform and related services;
- Manage captive portal and connectivity-related features;
- Support logins, authentication and account continuity;
- Apply age-related or eligibility-related rules where relevant;
- Provide user support and respond to platform requests; and
- Maintain, administer and improve the Platform.

7.2 Profile Completion and Platform Personalisation

Sebenza may use profile information to:

- Complete or maintain user profiles;
- Improve the relevance of the user experience;
- Better understand audiences and user needs;
- Support platform segmentation and platform-level personalisation; and
- Administer engagement, rewards and survey features.

7.3 Advertising, Engagement and Campaign Analytics

Sebenza may use personal information and engagement data to:



- Present content, campaigns, promotions or advertisements;
- Understand how users engage with content or campaigns;
- Measure campaign performance and engagement;
- Create audience, behavioural or performance insights; and
- Improve the relevance, design and effectiveness of the Platform and related content.

7.4 Surveys and insight generation

Sebenza may use information collected through surveys, questionnaires and similar tools to:

- gather user feedback and preferences;
- understand market, audience or behavioural trends;
- improve the Platform;
- support internal analysis; and
- generate aggregated or non-identifying insights for reporting or campaign purposes.

7.5 Sebenza Bucks and Rewards Administration

Sebenza may use information to:

- Award, credit, administer and track Sebenza Bucks;
- Enable and record redemption activity;
- Prevent fraud, abuse or misuse of rewards features;
- Investigate and resolve reward or redemption issues; and
- Support related transaction and compliance processes.

7.6 Lead Generation and Advertiser Handoff

Where you choose to respond to an offer and submit identifiable contact details, Sebenza may use that information to:

- Capture your lead request;
- Record the fact that you chose to be contacted;
- Transfer your details to the relevant advertiser or third party;
- Maintain an audit trail of the lead handoff or consent event; and
- Support complaints handling, verification or compliance relating to that handoff.

7.7 Third-Party Redirects and External Interactions

Sebenza may use limited information relating to redirects or external interactions to:

- Facilitate the redirect or interaction;
- Support campaign administration;
- Record traffic, click or redirect events;
- Manage fraud, abuse or misuse risk;
- Maintain compliance and audit records; and
- Improve platform design and user flow.

7.8 Compliance, Legal Protection and Platform Governance

Sebenza may also use personal information to:

- Comply with legal and regulatory obligations;
- Protect the Platform, its users and third parties;



- Investigate fraud, misuse, abuse, suspicious activity or complaints;
- Establish, exercise or defend legal rights; and
- Enforce platform rules, terms and related controls.

8. Why Sebenza is Allowed to Use Your Information

Sebenza uses different legal justifications for different types of processing, depending on how you interact with the Platform.

These justifications may include:

- Where processing is necessary to provide, operate, maintain or administer the Platform or a feature you have chosen to use;
- Where processing is necessary to take steps at your request or to perform obligations arising from your use of the Platform and related services;
- Where processing is necessary to comply with legal or regulatory obligations;
- Where processing is necessary to protect or promote your legitimate interests as a user or commuter, including account continuity, platform safety, fraud prevention, age-appropriate access controls, support, and the integrity of rewards or offer-related interactions;
- Where processing is necessary for Sebenza's legitimate operational, security, support, analytics, platform-governance, campaign-administration or fraud-prevention interests, or those of a relevant third party, balanced against your rights and expectations; and
- Where you have given a specific permission, election or opt-in, for example in relation to certain communications, lead handoff, or another optional interaction.

Sebenza does not treat all processing on the Platform as based on one blanket consent.

Sebenza also does not treat refusal of optional marketing permissions, by itself, as a reason to deny ordinary core platform access, although some optional features may depend on separate permissions, eligibility rules or feature-specific conditions. POPIA recognises several lawful grounds for processing, including consent, steps taken at the data subject's request, legal obligations, protection of the data subject's legitimate interests, and the legitimate interests of the responsible party or a third party.

9. Profiling, Segmentation and Analytics

Sebenza may use profile information, engagement information, platform activity and related data signals to better understand how the Platform is used and to improve relevance, campaign performance, user experience and audience understanding.

This may include:

- Grouping users into audience or behavioural segments;
- Identifying patterns in content, survey or campaign engagement;
- Generating internal engagement or audience insights;
- Improving campaign targeting logic, exclusions or relevance;
- Refining how platform experiences are delivered; and
- Helping ensure that certain content, offers or experiences are more appropriate to the user context.

Not all profiling or segmentation leads to a decision with legal or similarly significant effect. Much of this activity is used to understand audiences, improve the Platform, administer engagement features, protect user experience, and produce performance or insight outputs.

Where a particular feature involves a more specific form of profiling, additional notices, permissions or choices may be presented to you.



10. Marketing and Communications

Sebenza may send you communications relating to:

- Account or platform administration;
- Verification or security matters;
- Support, service or operational updates; and
- Rewards, redemption or account-related notifications.

Where Sebenza offers promotional or marketing communications, these may be managed through separate channel-based choices, depending on the context.

These channels may include:

- SMS;
- WhatsApp;
- Email;
- Calls; and
- In-platform promotions or messages.

Advertiser contact following a lead-generation interaction is separate from ordinary Sebenza platform communications. If you choose to submit your details in response to an advertiser offer, that advertiser may contact you directly in line with the notice and choice presented at that time. The Information Regulator's guidance on direct marketing supports separating promotional permissions from other processing contexts and treating marketing choices carefully.

11. When We Share Your Information

Sebenza may share personal information with third parties where this is appropriate to operate the Platform, provide services, administer rewards, support campaigns, facilitate advertiser or partner interactions, process lead-generation requests, enable third-party redirects, comply with legal obligations, protect the Platform, or otherwise give effect to a feature or interaction you choose to use.

The third parties with whom information may be shared include service providers, hosting and technology providers, messaging and verification providers, analytics and reporting providers, advertisers, clients, campaign partners, rewards and redemption partners, lead recipients, external platform operators, professional advisers, regulators and other parties involved in the relevant service, campaign, offer, reward, redirect or interaction.

The type of information shared will depend on the context. It may include information you provide directly, account or verification information, profile or eligibility information, campaign or survey interaction information, rewards or redemption information, lead information, redirect or click information, device or session information, and audit, fraud-prevention or compliance records.

11.1 Service Providers and Platform Support Parties

Sebenza may share information with service providers, operators or support partners who help Sebenza:

- Host, secure or maintain the Platform;
- Support authentication, messaging or verification;
- Support analytics, reporting or campaign operations;
- Administer rewards or redemption features; and
- Provide customer support, fraud-prevention or compliance assistance.

These parties are expected to use the information only for the functions they perform for Sebenza and subject to appropriate controls.



11.2 Advertisers and Clients

Sebenza may share information with advertisers, clients and campaign partners where this is relevant to a campaign, offer, survey, promotion, lead-generation opportunity, reward feature or other commercial interaction on the Platform.

Depending on the context, this may include:

- aggregated or non-identifying reporting;
- segmented or analytical campaign results;
- performance and engagement insights;
- campaign interaction records; and
- where you have chosen to submit your details or engage with a specific offer, identifiable information necessary to give effect to that interaction

Sebenza does not treat all advertiser-facing outputs as identical. Not every advertiser interaction involves identifiable user data, and where identifiable information is shared, Sebenza will seek to make this clear through the relevant notice, form, offer journey or point-of-collection disclosure.

11.3 Identifiable Lead Handoff

Where you choose to submit your personal information in response to a specific offer, campaign promotion, lead-generation opportunity, callback request, quotation request, sign-up opportunity or similar third-party interaction, Sebenza may share the information you provide with the relevant advertiser, client, campaign partner or third party so that they can contact you directly.

This may include your name, mobile number, email address, offer selection, campaign reference, consent or permission record, time and date of submission, and other information reasonably necessary to verify, administer or evidence the handoff.

The relevant third party may then contact you directly and may process your information as a responsible party in accordance with its own privacy notice and applicable law. Sebenza may retain records of the handoff and related permission, audit, compliance, complaint-handling and fraud-prevention information.

11.4 Redirects and External Partner Interactions

Where the Platform facilitates a redirect or external interaction, Sebenza may share limited information necessary to support that interaction, campaign administration, compliance, fraud prevention or related platform functions, depending on the structure of the interaction.

11.5 Legal, Safety and Compliance Disclosures

Sebenza may disclose personal information where reasonably necessary:

- To comply with law or regulatory requirements;
- To respond to court orders, lawful requests or official processes;
- To protect Sebenza, its users, service providers or third parties;
- To investigate fraud, abuse, unlawful conduct or security incidents; and
- To enforce rights or platform rules.

11.6 Business Change or Restructuring



If Sebenza undergoes a merger, acquisition, restructuring, sale of assets or similar business transaction, personal information may be disclosed as part of that process, subject to appropriate safeguards and lawful requirements.

12. Lead Generation and Advertiser Contact

Some campaigns or offers may allow you to indicate that you want to hear from a particular advertiser or third party. A key feature of the Platform is that users may be presented with third-party offers, campaigns or opportunities and may choose to share their details so that a third party can contact them directly.

Where you choose to submit your details in response to such an offer:

- Sebenza may collect the identifying information you provide;
- Sebenza may record the context of the interaction and the fact that you chose to proceed;
- Sebenza may transfer your information to the relevant advertiser or third party; and
- That advertiser or third party may then contact you directly as its own responsible party for that downstream communication.

Sebenza may retain records of the lead handoff, related permissions and related audit information for compliance, complaints handling, fraud prevention and dispute resolution.

By submitting your details in response to such an offer, you understand that Sebenza will share those details with the relevant advertiser or third party identified in the offer journey or point-of-collection notice.

13. Third-Party Links, Redirects and External Environments

The Platform may include buttons, links, calls to action, partner offers, promotions or redirects that take you to an external website, platform or service.

Where that happens:

- You may be leaving the Sebenza environment;
- The external party's own terms, privacy practices and notices may apply to information you provide on that site or platform; and
- Sebenza's role may be limited to facilitating the redirect, offer or campaign journey, unless clearly stated otherwise.

Sebenza may use external-link notices, warnings or other disclosures before redirecting you.

14. Cookies, Tracking Technologies and Online Tools

Sebenza may use cookies, pixels, tags, SDKs or similar online tools on the website, captive portal or platform, depending on the feature and technology environment.

These tools may be used for purposes such as:

- Enabling essential platform functionality;
- Remembering preferences or session state;
- Understanding website or platform performance;
- Measuring engagement; and
- Supporting campaign or content analysis.

Where non-essential tracking tools are used, Sebenza may provide a separate cookie notice, cookie policy, consent tool or banner.



15. How Long We Keep Information

Sebenza keeps different categories of personal information for different periods depending on why the information was collected, how the Platform operates, legal obligations, fraud prevention needs, dispute handling, compliance requirements and whether the information has been deleted, de-linked or de-identified.

Retention may therefore vary depending on whether the information relates to account administration, verification, profile data, surveys, campaign or engagement activity, rewards and redemption, lead handoff records, support records, legal records or de-identified analytical information.

Sebenza does not rely on one single generic retention rule for all information. Instead, Sebenza applies retention logic according to the function the information performs in the Platform and the relevant legal, operational and compliance context.

16. Deletion, De-Identification and Account Closure

Where platform functionality allows, you may request deletion or closure of your profile or account.

When an account or profile is deleted or closed, Sebenza may remove, deactivate, de-link, hash, anonymise or otherwise de-identify certain information where appropriate.

Sebenza will generally stop using deleted-account information for identifiable advertising or external sharing, subject to lawful retention needs. Some information may still be retained where necessary for compliance, fraud prevention, disputes, legal claims, audit records, operational integrity or de-identified analytical purposes.

Deletion does not necessarily mean immediate or universal erasure from every system, backup, archive or compliance record.

17. Cross-Border Transfers and Cloud Storage

Sebenza may use service providers, infrastructure providers, cloud environments, messaging tools, analytics tools or other support services that process or store information outside South Africa.

Where cross-border processing or storage occurs, Sebenza will take steps appropriate under applicable law and the relevant transfer context.

Sebenza does not rely on one single transfer model for all processing. Transfer and hosting arrangements may vary depending on the service provider, infrastructure environment and feature involved.

18. Security Safeguards

Sebenza uses reasonable technical and organisational measures to help protect personal information against loss, misuse, unauthorised access, disclosure, alteration or destruction.

These measures may include, where appropriate:

- Access controls;
- Authentication controls;
- Role-based restrictions;
- Secure transmission methods;
- Monitoring and fraud-prevention controls; and
- Service-provider and confidentiality controls.



No system, network or digital service is completely risk-free, and Sebenza cannot guarantee absolute security at all times. If Sebenza becomes aware of a material security issue requiring action under applicable law, Sebenza will respond in accordance with its legal and operational obligations.

19. Your Rights

Subject to applicable law, you may have the right to:

- Be informed about how your personal information is processed;
- Request access to personal information held about you;
- Request correction of inaccurate or incomplete information;
- Request deletion, destruction or de-identification of information in appropriate circumstances;
- Object to certain processing in appropriate circumstances;
- Withdraw a permission or opt-in where processing depends on that choice;
- Lodge a complaint with Sebenza; and
- Lodge a complaint with the Information Regulator.

These rights are not always absolute and may depend on the legal basis for processing, the nature of the information, the function of the Platform, and Sebenza's legal or compliance obligations.

20. How to Contact Us and How to Complain

If you have a privacy query, want to exercise a right, or want to submit a complaint, you may contact Sebenza using the contact details made available on the website, platform or legal disclosures.

Privacy and information-access requests may also be directed to Sebenza's Information Officer using the contact details Sebenza makes available for that purpose.

If you believe Sebenza is not processing your personal information lawfully, you may also lodge a complaint with the Information Regulator of South Africa. POPIA provides data-subject rights such as access, correction, objection in appropriate circumstances, and complaint mechanisms, including to the Information Regulator.

21. Changes to this Privacy Policy

Sebenza may update this Privacy Policy from time to time.

An updated version may be published on the website, captive portal or Platform, together with an updated effective date or version reference where appropriate.

Where reasonably appropriate, Sebenza may draw material changes to your attention more prominently.