



24 Bit Games (Pty) Ltd – Website Privacy Policy

Date Last Reviewed: 18 October 2023

Introduction

We are 24 Bit Games (Pty) Ltd (hereafter simply '24 Bit Games'). We are a private company incorporated in accordance with the company laws of the Republic of South Africa with enterprise number 2012/046665/07 and usual place of business at 1st Floor Skeen Office Park, 16 Skeen Boulevard, Bedfordview, Johannesburg, South Africa, 2007.

The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person.

Please note that this Policy only covers the services provided on and access related to the 24 Bit Games Website. You will find our website at <https://24bitgames.com/>.

Audience

This policy applies to you if you are a visitor to our website.

Personal Data

Personal data includes:

- certain information that we collect automatically when you visit our website;
- if applicable, certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and



- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, 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).

Common examples of Personal Data

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

Sensitive personal data

While unlikely to be necessary, depending on the goods or services that you require, we may also collect sensitive personal data including but not limited to your:

- **financial information** – such as your bank account details;
- **demographic information** – such as your race or ethnicity;
- **employment information** – including your membership of a trade union; or
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings.

Acceptance

Acceptance required

You must accept all the terms of this policy when you register for or use the website or any of our services. If you do not agree with anything in this policy, then you may not register for or use the website or any of our services.



Legal capacity

You may not access our website or order our goods or request our services if you do not have the capacity to conclude legally binding contracts. If you are above the age of 18, you will most likely have the legal capacity to do so. We do not knowingly collect personally identifiable information from anyone under the age of 18.

If you are younger than 18 but older than 13, you will inform your parents or guardians that you have registered with us. Depending on which country you live in, we may require their consent to contract with you. We may also request that you or your parents provide us with proof of your age or that they have consented for you to use our website or services.

We will not knowingly offer any services or access to our website to any person under the age of 13 years. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without parental consent, we will take steps to remove that information from our servers.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal data or the information of another data subjects where you have their permission to do so. You must ensure that any permission or consent that you obtain from a data subject to process their data is in written form, using clear and easily understandable language.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our



goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

Collection of information

On registration

If registration is required, once you register on our website you will no longer be anonymous to us. You will provide us with certain personal information when you register on our website.

This personal information may include:

- your name and surname;
- your email address;
- your telephone number;
- your company name and related information;
- your postal address or street address; and
- your username and password.

We will use this personal data to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

On order or request

In the event where we offer goods or services via our website, when you order such goods or our services from us, you will be asked to provide us with additional information on a voluntary basis.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address, browsing habits, click patterns, 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, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website. Please note that other websites visited before entering our website might



place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- granting you access to age restricted content;
- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

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. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.



Optional details

You may also provide additional information to us on a voluntary basis. This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

Recording calls

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.



Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages. We will not send you promotional messages unless you have chosen to opt into them. We may however send you messages asking you to opt-into promotional messages without you having opted into promotional messages.

Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.



No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Disclosure

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- 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); and



- other third parties who provide us with relevant services where appropriate.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may



request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or contacting us by phone or email. You are entitled to a right to be forgotten. We will delete any personal data that you don't want us to have provided the data is no longer necessary for the purpose for which we collected it. If you do this, we will remove your personal data from



our system, but we may still retain certain personal data as required or allowed by law, including, but not limited to:

- where we can show legitimate grounds for processing your personal data that override your request; or
- where we process your personal data in order to establish, exercise or defend legal claims.

If you are a data subject of one of our customers (who is the data controller), then you must submit your request to the relevant data controller who will then delete your personal data.

Data portability

If you should wish to transfer your data from us to another data controller we will facilitate this transfer. We will pass on all of our personal data to the data controller. If you are a data subject of one of our customers (who is the data controller), then you must submit your request for your personal data to the relevant data controller, who will then export your personal data as a Microsoft Excel or CSV file.

Data breaches

We will notify our customers of any confirmed data breaches that have occurred. We will notify the relevant supervisory authority and any affected data subjects of the data breach.

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us at info@24bitgames.com or consult our PAIA Manual for further information.