



CONFIDENTIAL INFORMATION

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PRIVACY POLICY

EFFECTIVE DATE: MAY 2025

This Privacy Policy has been updated to comply with the Protection of Personal Information Act 4 of 2013 (POPIA), the Electronic Communications and Transactions Act 25 of 2002 (ECTA), and other applicable South African legislation.

INTRODUCTION

This Privacy Policy, together with our posted Terms and Conditions, explains how ONE39 Central ("we", "us", "our") collects, uses, stores, processes, and safeguards personal information in the course of providing our services and operating our websites (collectively, our "Services").

As the responsible party under POPIA, we are committed to protecting your privacy and ensuring that all personal information collected is processed lawfully, transparently, and securely. All information collected by us in connection with our Services will be governed by this Privacy Policy.

1. DEFINITIONS

For the purposes of this Privacy Policy:

- **"Personal information"** means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA.
- **"Processing"** means any operation or activity concerning personal information, including collection, receipt, recording, organization, collation, storage, updating, modification, retrieval, alteration, consultation, use, dissemination, distribution, merging, linking, restriction, degradation, erasure or destruction of information.
- **"Data subject"** means the person to whom personal information relates.
- **"Responsible party"** means ONE39 Central, as the party who determines the purpose of and means for processing personal information.
- **"Operator"** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

2. WHAT INFORMATION WE COLLECT

As a service provider for live events serving marketers, organizers, and event attendees, we from time to time request that you provide us with personal information. We may collect information when you request a proposal from us, place orders with us, establish an account with us, request information, interact with our customer service, participate in a marketing campaign, complete surveys, or use our websites.

In some instances, we may need to supplement the information you provided with certain personal information about you obtained from third parties to process your online transaction, but only with your knowledge and consent where required by law.

2.1 Categories of Personal Information

We may collect the following categories of personal information:

2.1.1 Contact Information

- Full name and title
- Physical and postal addresses
- Email addresses

- Telephone and facsimile numbers
- IP address and device identifiers

2.1.2 Transaction Information

- Payment card information
- Financial account information
- Purchase history and preferences
- Special requests
- Delivery details
- Communications you have with us

2.1.3 Preference Information

- Marketing preferences
- Areas of interest
- Subscriptions to ONE39 Central resources

2.1.4 Legal Information

- Transaction fraud checks or flags
- Payment card refusals
- Information or copies of documents you provide where the law requires you to prove your identity
- Tax information where applicable
- Company registration details for juristic persons

2.1.5 Voluntary Information

- Feedback and complaints
- Survey responses
- Other information you voluntarily provide to us

2.1.6 Observed Information

- Information we collect about you while you use our websites
- Pages, services, or areas of our websites that you visit
- Your geographic location (with consent)
- Referring websites or links
- Browser and device information
- Cookies and similar technologies (subject to our Cookie Policy)

2.2 Tracking and Analytics

From our initial engagement with you, we may track your interactions with us to better understand the scope of our relationship. For each interaction, we retain your name when you purchase goods or services from us, as well as the nature and amount of the purchase.

We combine that information with:

- Records of information you request from us
- How you respond to our emails and other electronic messages
- Your activity at our websites (including our web-based and mobile software applications)

2.3 Special Personal Information

We do not intentionally collect any special personal information (as defined in POPIA) such as religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, unless:

- You have consented to such processing;
- Processing is necessary for the establishment, exercise, or defense of a right or obligation in law;
- Processing is for historical, statistical, or research purposes; or
- The information has been deliberately made public by you.

2.4 Children's Privacy

We do not knowingly collect personal information from children under the age of 18 without the consent of a parent or guardian. If we become aware that we have inadvertently collected personal information from a child under the age of 18 without appropriate consent, we will delete such information from our records.

3. LEGAL BASIS FOR PROCESSING YOUR INFORMATION

We process your personal information in accordance with POPIA. Our legal bases for processing include:

3.1 Consent

- Where you have given us specific, informed, and freely given consent to process your personal information for a particular purpose.

3.2 Contract

- Where processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract.

3.3 Legal Obligation

- Where processing is necessary for compliance with a legal obligation to which we are subject.

3.4 Legitimate Interest

- Where processing is necessary for pursuing our legitimate interests or those of a third party, provided these interests are not overridden by your rights and freedoms.

3.5 Public Interest

- Where processing is necessary for the performance of a task carried out in the public interest.

4. WHY WE COLLECT INFORMATION

We use personal information for the following purposes:

4.1 Our Services

- To deliver the Services you have requested.
- To process your order, including credit evaluation, payment authorization, and collection of sums owed.
- To give you service notices and deal with any customer care issues you may have.
- To manage any registered accounts you may have with us.
- To create and secure an online account in our Subscription Centre, if you choose to establish one.
- To notify you of any changes to our Services.
- To provide services and fulfil our obligations to event organizers, venues, and hotels in connection with events you participate in, including through the use of non-personal anonymous, aggregate, and statistical information.

4.2 Marketing and Communications

- To communicate with you regarding an upcoming show or event.
- To offer services at an upcoming show or event.
- When ONE39 Central serves as an official contractor for an event or venue, to offer and/or fulfil certain authorized services through ONE39 Central's third-party preferred contractors.
- To promote relevant ONE39 Central offerings related to your areas of interest or based on previously conducted business, where we have established a legitimate interest or obtained your consent.
- To deliver information you request and communicate about us and other ONE39 Central brand offerings from our global affiliates that may be of interest to you.
- To advertise our products and services to you where relevant and appropriate, subject to your marketing preferences.
- To maintain a profile of our ongoing relationship that allows us to better serve you and tailor our offers to your interests.
- To share with other companies within the ONE39 Central brand affiliates as needed for reasonable management, analysis, planning, and decision making, including for expansion and promotion of our services.

4.3 Research and Development

- To obtain your feedback, provide customer service, and track our performance.
- To ensure that our online content is presented in the most effective manner for you.
- To operate our websites more effectively and to promote our services.
- To manage, conduct research, and improve how we operate and promote our services, including through the use of non-personal anonymous, aggregate, and statistical information.

4.4 Analysis and Profiling

- To analyze your responses to our marketing communications.
- To analyze your browsing and purchasing activity.
- To use these analyses, together with other demographic data, to contact you with information on products and offers relevant to you, subject to your consent where required.
- To analyze customer choices to understand our target audience for appropriate advertising purposes.

4.5 Legal Requirements

- For pursuing legal claims, crime and fraud prevention, detection, and related matters.
- To verify your identity when considered necessary and/or appropriate.
- To assist in issues relating to your personal safety and the safety of others.
- To comply with laws applicable to our operations, to respond to requests from government authorities, to enforce our rights and protect property, and to satisfy record-keeping, regulatory, and legal requirements.
- If ownership of all or part of our business changes, or we undergo a reorganization or asset sale, including a merger or transfer, we may transfer your personal information to the new owner, receiver, or successor company to enable us to continue to provide our Services to you.

5. SHARING YOUR INFORMATION

5.1 Who We Share With

We may share your personal information with some of our affiliates and trusted third parties to make certain Services available to you. Within our affiliated ONE39 Central companies, we occasionally share your information as needed for purposes set forth in the section titled "Why We Collect Information" above.

Third parties are permitted to use your personal information only to assist us in providing our Services to you or to offer complementary goods and/or services that we have good reason to believe may be of particular interest to you, subject to appropriate data processing agreements.

We may also share this information with non-affiliated companies such as tradeshow organizers, venues, associations, exhibitors, and attendees for purposes of conducting events, where you have consented or where we have a legitimate interest to do so.

More specifically, we may share your personal information with:

- Payment services providers as required for card payments.
- Event organizers, hotels, and other third parties as necessary to perform our contracts.
- Service providers who perform functions on our behalf, such as website hosting, data analysis, payment processing, order fulfilment, IT services, customer service, email delivery, auditing, and other services.
- Other third parties to meet legal, regulatory, insurance, audit, and other similar administrative needs.
- Law enforcement, government agencies, or authorized third parties, when required by law, court order, or similar legal process.

5.2 Operators and Third-Party Processing

All parties we share information with are required to:

- Treat your information confidentially
- Show they have appropriate data protection and security controls
- Enter into appropriate data processing agreements with us
- Protect personal information consistent with the principles articulated in this Privacy Policy and POPIA

Wherever possible and reasonable, we will disclose only the minimum information necessary to complete and process an order or fulfil the purpose for which the information is shared.

5.3 Business Transitions

In the event we go through a merger, sale, bankruptcy, or other business transition, we reserve the right to transfer or assign your information that we have collected as part of any business transition. In such cases, we will ensure that the receiving party maintains at least the same level of protection for your personal information as outlined in this Privacy Policy.

6. INTERNATIONAL TRANSFERS

The nature of our business and our operations may require us on occasion to transfer personal information to our ONE39 Central brand affiliates and third parties that may be located in countries outside of South Africa.

6.1 Cross-Border Transfer Compliance

We comply with all applicable global privacy and data protection requirements when transferring your information internationally. All cross-border transfers of your information will be in compliance with:

- Section 72 of POPIA
- The local privacy laws of the jurisdiction from which we are transferring the data
- The terms of this Privacy Policy

6.2 Safeguards for International Transfers

We will only transfer your personal information to a third party in a foreign country when:

- The recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection similar to POPIA;
- You consent to the transfer;
- The transfer is necessary for the performance of a contract between you and us;
- The transfer is necessary for the implementation of pre-contractual measures taken in response to your request;
- The transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and another person; or
- The transfer is for your benefit, and it is not reasonably practicable to obtain your consent, but if it were, you would likely provide it.

7. HOW WE SAFEGUARD YOUR INFORMATION

7.1 Security Measures

We employ reasonable technical and organizational measures to protect against the loss of, or unauthorized access to, the information under our control, including:

- Industry-standard infrastructure security
- Secure Socket Layer (SSL) encryption technology for payment transactions
- Digital certificates
- Password protection for all web applications that contain personal information
- Firewalls and intrusion detection systems
- Regular security assessments and audits
- Staff training on data protection and security
- Physical security measures for our premises and data centres

7.2 Access Controls

All our web applications that deal with your personal information require a username and password to gain access. This allows us to verify who you are, thereby allowing you access to your account information and preventing unauthorized access.

You should not divulge this username and password to anyone. Although we take measures to protect your information, we cannot guarantee that your information will always remain secure.

7.3 Data Breach Notification

In the event of a security breach that compromises your personal information, we will:

- Notify the Information Regulator as soon as reasonably possible
- Notify you as soon as reasonably possible if there are reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorized person
- Provide sufficient information to allow you to take protective measures against potential consequences of the compromise

8. YOUR RIGHTS

Under POPIA and other applicable laws, you have the following rights:

8.1 Right to Access

You have the right to request confirmation of whether we hold personal information about you and to access that information.

8.2 Right to Correction

You have the right to request the correction of your personal information if it is inaccurate, incomplete, misleading, or out of date.

8.3 Right to Deletion

You have the right to request the deletion or destruction of your personal information under certain circumstances.

8.4 Right to Object

You have the right to object to the processing of your personal information on reasonable grounds.

8.5 Right to Withdraw Consent

You have the right to withdraw your consent to the processing of your personal information at any time, subject to contractual and legal restrictions and reasonable notice.

8.6 Right to Complain

You have the right to submit a complaint to the Information Regulator if you believe that we have interfered with the protection of your personal information.

8.7 How to Exercise Your Rights

To exercise any of these rights, please contact our Information Officer using the contact details provided in the "Contact Us" section below. We will respond to your request within a reasonable timeframe, not exceeding 30 days.

9. OPTING-OUT OF FURTHER COMMUNICATIONS

At any time you may:

- "Opt out" or "Unsubscribe" from receiving some or all emails from us such as service offers, subscriptions, periodic information, and other correspondence by selecting the "Manage My Subscriptions" link on emails from us or by contacting us as provided in the "Contact Us" section below.
- Withdraw your consent to our collection, use, and disclosure of information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your information, we may no longer be able to provide certain Services.

10. RETENTION OF INFORMATION WE COLLECT

10.1 Retention Period

We will retain your information as follows:

- Unless we obtained your consent for longer retention at the time of collecting the personal information, personal information we collect will be retained for a period of three (3) years from your last activity with us, or for as long as necessary for the purpose for which it was collected.
- Information that must be maintained for legal purposes such as specific financial information will be kept in accordance with the relevant legislation and any applicable local/regulatory guidance (which may be for a longer period, often up to 7 years).
- We may retain de-identified information for statistical, research, and analytical purposes indefinitely.

10.2 Deletion of Information

You may request us to delete your information at any time by contacting us as provided in the "Contact Us" section below, subject to legal retention requirements and legitimate business needs.

11. COOKIES AND SIMILAR TECHNOLOGIES

11.1 Cookie Policy

Our websites use cookies and similar technologies to enhance your browsing experience, analyze website traffic, and personalize content. For more information about the cookies we use and how to manage them, please refer to our Cookie Policy posted on our websites.

11.2 Your Cookie Choices

You can manage your cookie preferences through your browser settings or the preference centre on our websites. Please note that disabling certain cookies may impact the functionality of our websites and limit your ability to use certain features.

12. DIRECT MARKETING

12.1 Consent for Direct Marketing

We will only send you direct marketing communications if:

- You have given us your consent to do so; or
- You are an existing customer and the communications relate to similar products or services to those you have previously purchased from us.

12.2 Opting Out of Direct Marketing

Every direct marketing communication from us will include an easy way for you to opt out of receiving future marketing communications. You can also opt out at any time by contacting our Information Officer.

13. UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or applicable laws and regulations. When we make changes, we will update the "Effective Date" at the top of this Privacy Policy.

We encourage you to review this Privacy Policy periodically to stay informed about our information practices. Your continued use of our Services after any modifications to this Privacy Policy constitutes your acceptance of such changes.

14. CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact our Information Officer:

Information Officer

ONE39 Central

[Physical Address]

[Postal Address]

Email: privacy@one39central.com

Phone: [Phone Number]

14.1 Information Regulator

You have the right to lodge a complaint with the Information Regulator of South Africa:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017
Email: complaints.IR@justice.gov.za
Website: <https://www.justice.gov.za/inforeg/>

15. GOVERNING LAW

This Privacy Policy shall be governed by and construed in accordance with the laws of the Republic of South Africa, including POPIA and other applicable data protection legislation.

By using our Services, you acknowledge that you have read and understood this Privacy Policy and agree to the collection, use, and disclosure of your information as described herein.

This Privacy Policy together with our posted terms and conditions explains how we collect, use, and safeguard information while providing our services and operating our websites (collectively, our "Services").

All information collected by us in connection with our Services will be governed by this Privacy Policy. We are POPI Registered and compliant.