

**BETTING WORLD PROPRIETARY LIMITED TRADING AS BETFRED**  
**CUSTOMER PRIVACY POLICY ("CPP")**

**1. GENERAL INFORMATION**

- I. Betting World (Pty) Limited trading as Betfred and its subsidiaries and/or affiliates (as applicable) being ("Betfred") want you ("the Data Subject") to be familiar with our CPP and how we may use, collect, process and disclose your personal information through the use of this website, including all information supplied to us in the registration of an account, and any relevant betting with that account, or other such processes associated with betting and the use of the web or mobile sites. We will ensure that the personal information we may collect from you is handled with care and processed responsibly. Betfred is the Responsible Party in terms of the POPI Act (Protection of Personal Information Act) in regard to your Personal Information.
- II. This CPP is intended to clearly set out our position with respect to the processing of your Personal Information irrespective if it is in the terms of this CPP or not. In this CPP we summarise our principal obligations to you under POPIA and the lawful processing of your Personal Information, and including any rights you may have in relation thereto.
- III. Where you have a query in regard to your Personal Information then you will be able to contact our Information Officer at the following [informationofficer@betfredsa.co.za](mailto:informationofficer@betfredsa.co.za)
- IV. This CPP is written to provide you with an understanding of the methodology used by us in developing our data policy to ensure you receive the appropriate level of protection, in the process, or processing use, of your Personal Information, and represents our commitment to compliance with all obligations under the POPI Act, 2013 ("POPIA"). Further this CPP is written in accordance with the provisions of POPIA, detailing the lawful approach we take in the use and collection of your information, and in regard to that use, the processing of all such information collected in the normal course of our business with you and/or other legitimate sources, such as credit reporting companies and other entities listed in this policy. We confirm that we process Personal Information for the sole and exclusive use for which it is sought and intended.
- V. It is our policy to respect all aspects of your privacy and we are committed to deliver such privacy to all users of this Betfred digital service and we acknowledge to you, that we will use all reasonable endeavours in the collection, processing and use of your Personal Information at all times.

VI. We reserve the right to make changes or updates to this CPP, from time to time as is required by the business, and we would ask that you periodically check this CPP for updates, such that you maintain understanding on how we process and protect your Personal Information.

## 2. COLLECTION OF PERSONAL INFORMATION AND WHO IT APPLIES TO

This CPP applies to all customers using the Betfred website and/or mobile site (if applicable). If you have any questions about this CPP, please email us at [privacy@betfredsa.co.za](mailto:privacy@betfredsa.co.za)

## 3. WHAT PERSONAL INFORMATION WE COLLECT AND GENERATE

Please be aware that under Section 18 of POPIA we need to make you aware that when you engage in any promotion, or competition run by us, (directly or indirectly), transact with us, *by registering, depositing monies, placing bets, withdrawing monies or any other transaction or account interaction*, then you are providing Betfred with Personal Information, which may include, but not limited to the following:

Contact information	First and Last name
Home Address	Or other physical address
Gender	
Identity documents	Passport or ID
Proof of address	Utility bills
Source of Income	Any
Bank details	Account and Sort
Photographs or visual media	any
Occupation	
IP address	
Mobile Phone Number	
Email address	

Personal information means any information about a natural or legal person from which that person can be identified. It does not include information where the identity has been removed (anonymous information).

We collect the personal information we require to register you as a customer and to communicate with you.

Please note that we may collect and record all telephone calls made to us, email or internet communications, (including internet protocol address), any correspondence we have with you, all details of your accounting interactions with us (including betting transactions) and visits to our websites. In addition, we may collect and generate information in relation to your betting activities, and various other account metrics, and your customer profile.

#### **4. WHAT PERSONAL INFORMATION WE DO NOT COLLECT**

We do not collect any special categories of personal information about you, as defined in section 26 of POPIA including your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion (except as is required for purposes of identifying a politically exposed person (peps) under the Financial Intelligence Centre Act, 2001), health, sexual orientation, or any biometric information.

You may contact our Information Officer to obtain any information in regard to your personal data that we hold about you.

#### **5. WHEN AND WHY WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION**

We process your personal information to meet our contractual obligations with you, as well as collect and use your personal information for the following purposes:

- 1) Routine business purposes, and to let you register an account with us.
- 2) To verify your Personal Information.
- 3) To process your bet when you submit a betting transaction.
- 4) To advise you on the outcome of your bets.
- 5) To help us to develop new business opportunities.
- 6) To help us to develop new or improve products, that may be of interest to you.
- 7) To process a payment or withdrawal you have requested.
- 8) To administer your account.
- 9) To engage with you when you contact us for support.
- 10) To investigate and resolve your query, complaint or request.
- 11) To administer any promotional competitions, you may have entered with us, and to deliver your prize if you win.
- 12) To transfer your Personal Information cross border to other jurisdictions should it be so required for the legitimate business requirements and interests of Betfred, subject to this information transfer being authorised under Chapter 9 of POPIA which allows a Responsible Party ("access seeker") access to transfer the information across foreign borders in the following circumstances: -
  - i. Two bodies must provide adequate protection of the information so requested and received;
  - ii. You must consent to the transfer;
  - iii. The transfer must be necessary for the performance of a contract between you and the responsible party;
  - iv. For the implementation of pre-contractual measures taken in response to your request;
  - v. The conclusion or performance of a contract concluded in your interest between the Responsible Party and a third party; or

- vi. The transfer is for your benefit and it is not reasonably practicable to obtain your consent for that transfer and if it were reasonably practicable to obtain such consent, you would provide it.
- 13) To allocate UI (unique identifiers) to you for the purposes of processing, securely storing, retaining and utilising your Personal Information, from time to time, regardless of whether you conclude any agreement with us.
- 14) To process your Personal Information for the purpose of marketing and advertising products to you provided by Betfred, UNLESS you expressly "OPT-OUT".
- 15) To receive such confirmation from you, that you have agreed that we may act as the Responsible Party, if information is held by a third party.
- 16) To review the timings of your account interactions or otherwise with us, if you have transacted.

## **6. OTHER REASONS WE MAY COLLECT PERSONAL INFORMATION**

In some instances, we are legally required to collect and process certain information including the following: -

- 1) in respect of the Financial Intelligence Centre Act, we are obligated to KYC provisions (know your clients), including the monitoring of accounts to combat AML (anti money laundering, financing of terrorist activities, and to conduct sanction screening; and
- 2) to report suspicious, fraudulent or unusual activities on your account to the relevant authorities; and
- 3) to report to any other governmental agency or statutory body (including, but not limited to, the South African Revenue Service, the Mpumalanga Economic Regulator (or any other provincial gambling board), the South African Police, and the National Gambling Board); and
- 4) for the purposes of dealing with duplicate processing, chargeback requests/recall requests, allegations of fraud or impropriety received from any banking institution.

**Please note we reserve the right to disclose your Personal Information in the interests of maintaining and enforcing compliance to our terms and conditions, without prior notice to you the Data Subject and/or your consent. Additionally, we may use your Personal Information, WITHOUT prior notification and/or consent required from you, if such disclosure is enforced on us by a requirement to comply with any applicable law, subpoena, order of court or legal process served on us, or to protect and defend our rights or property.**

## **7. SHARING YOUR INFORMATION WITH OTHERS**

We only use service providers we trust and those who adhere to a Data Processing Agreement between us, and who have agreed to keep your personal information secure and confidential and to only use it for the purposes for which we shared it with them.

- a) We will take all reasonable steps to ensure that your information is kept secure and protected.
- b) Service providers we use are used to verify that your personal information provided is accurate and may be checked against appropriate third party databases, to verify identity, personal details or credit card information; and any other information supplied by you that Betfred deems necessary to acquire independent verification.

Some of the service providers that we use may be located in other countries. These countries may not have the same levels of protection of personal information as South Africa, in which case the foreign service providers must undertake to protect the personal information of our customers to the same level that we do.

We may be required to share your personal information with regulatory and law enforcement bodies.

## **8. PROTECTION AND STORAGE OF PERSONAL INFORMATION**

Your Personal Information is held by Betfred in a secure system or database. We undertake to take all reasonable steps to ensure your Personal Information is secure and the integrity of your data will be protected against misuse, loss, unauthorised access, interference or unauthorised disclosure.

Where we are required to process third party checks or payments, they will be transmitted via Betfred processors under a Data Processor Agreement, whom Betfred contract for the purpose.

## **9. USE OF YOUR PERSONAL INFORMATION WHEN ENTERING PROMOTIONAL COMPETITIONS**

In the event you enter any of our promotional competitions, we will collect and process your personal information for the purposes of the competition. This will include communication from us and our partners in relation to the competition.

As we are required by the Consumer Protection Act to announce the prize winners in any promotional competition held, details of winners will be published on our various social media platforms, namely, Facebook, Twitter and Instagram. This will usually be your name and surname.

On certain occasions, we may publish photographs of winners but in this case, we will always obtain your specific and informed consent.

You have a right to request that your personal information not be published on any of the social media platforms by sending an email to [privacy@betfredsa.co.za](mailto:privacy@betfredsa.co.za)

## **10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION**

We will not keep your personal information longer than we need to unless we are legally required to do so.

1. Betfred will always keep the Personal Information of a Data Subject for the period required by law and where it needs to do so in connection with legal action or an investigation in which it is involved; and
2. Otherwise, Betfred will keep Personal information of a Data Subject:
  1. for as long as needed to provide the Data Subject with access to services they have requested; and
  2. where the Data subject has contacted Betfred with a question or request, for as long as necessary to allow Betfred to respond to such question or request, as required by law.

## **11. IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide the Personal Information when requested, then we may not be able to contract with you, for such service we have, or are trying to enter into with you, e.g. to allow you to make a deposit. In this case, we may have to terminate the relevant product or service you have with us, but in this instance, we will notify you of this.

## **12. COOKIES**

The Betfred website makes use of cookies which are small text files that are transferred from your browser to your computer's hard drive and which store information about your activity on a browser. These cookies are stored for Betfred to ensure we offer an improved customer experience when you browse our website. Cookies are uniquely assigned to you and in some cases may be shared with our selected partners, in or out of South Africa, as a method to deliver interest-based adverts, offers or information through the website. You may, at any time, refuse to accept cookies by changing your browser settings, or deleting cookies that are already stored on your computer. Further information about cookies and how to delete them from your browser can be found at: <http://www.allaboutcookies.org>.

## **13. CHILDREN'S INFORMATION**

You have to be 18 years or older to make use of our services.

When you register for an account, we will ask you to confirm that you are 18 or older. We do not knowingly collect the personal information of persons under 18 years of age.

#### **14. YOUR RIGHTS AS A DATA SUBJECT**

You have the right to withdraw all or part of any consent you may have provided in relation to our processing of your Personal Information. In the event that you withdraw all or part of your consent, there may be a period of time during which Betfred is legally or contractually obliged to, or for which there may be a legitimate business need, to continue processing your Personal Information until a full and final termination of our business relationship with you can be affected.

If your consent is withdrawn partially or fully in any particular set of circumstances, this may influence our ability to provide services to you, for which Betfred cannot be held liable or responsible.

You have a right to be notified that your Personal Information is being collected.

You have a right to be notified of any security breaches and/or compromises where there are reasonable grounds to believe that your personal information may have been accessed by an unauthorised person.

You have a right to ask Betfred what Personal Information we have on record and gain access to such information.

You have the right to correct and/or erase wrong and/or inappropriate personal information provided that specific statutory and/or gaming regulations do not require us to retain certain Personal Information about you.

You have a right to unsubscribe ("opt-out") from any direct marketing material that Betfred may send you from time to time.

You have the right to submit a complaint to the Information Regulator.

You have the right to submit a complaint to the Information Regulator regarding any alleged interference with the protection of your personal information. You may complain verbally or in writing by contacting [informationofficer@betfredsa.co.za](mailto:informationofficer@betfredsa.co.za) - Registration Number: 0001990/2024-2025-IRRT/PR. Alternatively, you may lodge a formal complaint with the Information Regulator of South Africa ([complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za) / [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)). Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017.

You can request access to the personal information we hold about you or to correct your personal information. It can take us up to 21 days to respond to your request due to procedures that we are required to follow. In certain cases, we may require proof of your identity and

sometimes changes to your personal information may be subject to additional requirements such as valid proof of residence.

Please see below our contact details for our deputy information officers:

**15. APPLICATION OF CPP**

This CPP applies to all data (including all Personal Information) past, present or future submitted by you to Betfred, or which we otherwise obtain in the normal course of our business activities.

**16. INFORMATION OFFICER**

We certify that Marc Joubert has been registered as the Information Officer and Lawrence Azar has been registered as Deputy Information Officer with the Information Regulator by Betting World (Pty) Ltd - T/A BETFRED SA, in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 01 April 2024, under the registration number 0001990/2024-2025-IRRT/PR.

Marc Joubert	Information Officer	<a href="mailto:informationofficer@betfredsa.co.za">informationofficer@betfredsa.co.za</a>
Lawrence Azar	Deputy Information Officer	<a href="mailto:informationofficer@betfredsa.co.za">informationofficer@betfredsa.co.za</a>

**DEFINITIONS**

<b>Betfred</b>	means Betting World (Pty) Limited trading as Betfred and its subsidiaries and/or affiliates; collectively referred as “we”, “our”, and “us”.
<b>CPP</b>	means the Betfred Customer Privacy Policy
<b>Data Subject</b>	means the Customer; collectively referred as “you”, “yours” and “theirs”