

# **Privacy Policy for Reticulation Network Management (Pty) Ltd**

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use our service and tells you about your privacy rights and how the law protects you. We use your personal data to provide and improve our service. By using our service, you agree to the collection and use of information in accordance with this Privacy Policy.

# 1. Interpretation and Definitions

# Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

## **Definitions**

For the purposes of this Privacy Policy:

- Account means a unique account created for you to access our service or parts of our service.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this document) refers to Reticulation Network Management (Pty) Ltd, 73 Meade street, GEORGE, 6530.
- **Cookies** are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- Country refers to: South Africa
- **Device** means any device that can access the service such as a computer, a mobile phone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to metering of electricity consumption and payment platforms to purchase electricity.
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to Smartmeter, accessible from rnm.co.za and smartmeter.co.za as well as RNM Prepaid Metering accessible from prepaid.rnm.co.za and rnm.co.za.
- You means the individual accessing or using the Service, or the Company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

# 2. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- **To manage Your Account**: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of a transaction: The information collected from You is used to process your transaction and allocate funds to your electricity ledger.



- **To contact You**: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding transactions invoked by You or informative communications related to the Service.
- **To manage Your requests**: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your Usage Data with Service Providers to monitor and analyse the use of our Service.
- **For business transfers**: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

# 3. Collecting and Using Your Personal Data

# **Types of Data Collected:**

## **Personal Data**

While using Our Service, We request You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City

# **Usage Data**

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device which is needed for the functionality of the Website and for troubleshooting purposes.

# **JavaScript and Cookies**

We use Cookies and JavaScript to store information, secure the browsing session and facilitate the payment process. Without these technologies, the Website will not function at all.



- Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **JavaScript** is a text-based programming language used both on the client-side and server-side that makes web pages interactive. You can instruct your browser to block JavaScript, but the Website will then become unusable.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

# **Necessary / Essential Cookies**

Type: Session Cookies Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

# **Notice Acceptance Cookies**

Type: Persistent Cookies Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

# **Functionality Cookies**

Type: Persistent Cookies Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

## 4. Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

## 5. Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of the Company's operating offices.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.



The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

#### 6. Disclosure of Your Personal Data

## **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

## Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

# Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service
- Protect against legal liability

## 7. Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# 8. Your Rights

#### **Access to information**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact Us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

# **Correction of your information**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate. To do this, fill out the <a href="Request Form">Request Form</a> and send it to Us at the numbers/addresses as provided at the end of this document.

# **RNM** Reticulation Network Management

# 9 Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## 10 Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

# 11 Changes to this Privacy Policy

We may update Our Privacy Policy from time to time.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# 12 Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: admin@rnm.co.za
- By visiting this page on our website: <a href="https://www.rnm.co.za/contact/">https://www.rnm.co.za/contact/</a>
- By phone number: +27 861 222 623