PRIVACY POLICY

ORBIT LOYALTY (PTY) LTD

Registration number: 2026/259512/07

Last updated: 5 November 2026

1. INTRODUCTION

1.1 We are committed to protecting your privacy. We recognise our obligation to respect and protect the confidentiality of your personal information. This policy explains what personal information we collect, why we collect it, how we use, share and protect it, and the rights you have. South African law protects information about organisations as well as individuals, so in this policy "you" includes any organisation you represent. Please read it carefully.

2. WHO WE ARE

2.1 When we refer to "we", "us" or "our" in this policy, we are referring to Orbit Loyalty (Pty) Ltd, registration number 2026/259512/07, a company incorporated under the laws of the Republic of South Africa. Our registered office is at Unit S3, Executive City, Cnr Cross Street & Charmaine Avenue, President Ridge, Randburg, 2194. Our Information Officer is Niehaus Loots. We recommend that you contact us, and our Information Officer, by email at privacy@orbitloyalty.co.za.

3. LOYALTY PROGRAMMES RUN BY OUR CLIENTS

3.1 Orbit is a software-as-a-service provider. We provide a loyalty programme platform to our clients, who own and run their own loyalty programmes. This includes the cards and apps that carry a client's brand, even where Orbit is listed as the app developer in an app store.

3.2 Each client decides who its members are and is responsible for its own privacy policy and for the notices it gives to its members. If you are a member of a client's loyalty

programme, please refer to that client's privacy policy, which governs how your information is used in that programme.

3.3 If you want to see, correct or delete your information, or you have a complaint about it, please contact that client directly. If you contact us instead, we will refer your request to the relevant client.

3.4 In terms of the Protection of Personal Information Act 4 of 2013, the client is the responsible party for its members' information, and Orbit processes that information as the client's operator. This policy does not describe the processing of members' information on behalf of our clients. It applies to the personal information we process for our own purposes, as described below.

3.5 We may also create statistical information from the operation of our platform that has been de-identified and aggregated so that it does not identify any member, client or store. Information in that form is not personal information.

4. HOW WE COLLECT INFORMATION

4.1 We may collect information about you as follows:

4.1.1 From you, including when you contact us by email, by telephone or through the contact form on our website, request a demonstration, enter into discussions or agreements with us, or use our platform as an authorised user of one of our clients.

4.1.2 From your employer or the organisation you represent, for example where it gives us your details as a contact person or authorises you to use our platform.

4.1.3 From public sources and professional networks, in respect of business contact details.

4.1.4 From such other persons as you may consent to or who may be legally entitled to provide us with information about you.

5. INFORMATION WE MAY HOLD

5.1 We may record and hold the following types of information about you:

5.1.1 Your name, job title, employer, contact details and any other details you provide to us when you contact us or enter into discussions or agreements with us.

5.1.2 Details of your preferences regarding our services.

5.1.3 If you or your organisation is our client or supplier, billing, payment and banking details, including debit order details, and business information provided to us for pricing purposes, such as site turnover figures.

5.1.4 Details of when you contact us and when we contact you, including the email addresses and telephone numbers you use and the content of our communications. Telephone calls with us may be recorded.

5.1.5 If you use our platform as an authorised user of one of our clients, your login details and records of your activity on the platform, which we keep for security, support and audit purposes.

5.1.6 Technical information recorded in our website's server logs when you visit, such as your IP address, browser type and the pages requested.

5.2 Providing your information to us is voluntary. However, if you do not provide the information we ask for, we may not be able to respond to your enquiry, conclude or perform an agreement with you or your employer, or give you access to our platform. Some information, such as invoicing and accounting records, we are required to keep under tax and company law.

5.3 We keep your information for as long as we have a business relationship with you or your employer, and thereafter only for as long as necessary for the purposes set out in this policy, or for longer where the law requires or permits us to keep it.

6. WHY WE NEED YOUR INFORMATION

6.1 We collect and process your information so that we can engage with you and provide our services, and to pursue our legitimate interests. This includes processing for the following purposes:

6.1.1 To respond to your enquiries and requests, and to prepare, conclude and perform agreements with you or your employer.

6.1.2 To manage our business relationship with you, including communicating with you about our services, and calculating, reviewing, invoicing and collecting our fees.

6.1.3 To provide, support and secure our platform for authorised users.

6.1.4 To understand how our website and services are used, and to improve them.

6.1.5 To prevent, investigate and prosecute fraud, abuse of our services, security incidents and other unlawful activities.

6.1.6 To conduct market research and business analysis.

6.1.7 To comply with legal and regulatory requirements, for audit purposes and for legal proceedings.

6.2 Where we rely on your consent for a particular use of your information, we will use it only for that purpose. We do not use your information to send you marketing communications.

7. SHARING YOUR INFORMATION

7.1 Keeping your personal information secure is one of our most important responsibilities. We will not disclose your information unless legally permitted to do

so. We may share your information with the following people and organisations for the purposes set out in this policy:

7.1.1 Our directors, employees, contractors, agents, auditors, debt collectors, and legal and other professional advisors.

7.1.2 Service providers who act on our behalf, such as data hosting, communications, email and accounting providers, who are required to protect your information on principles similar to ours.

7.1.3 Your employer or the client you represent, where that is part of our relationship with them.

7.1.4 Governmental, judicial, regulatory and law enforcement bodies and agencies, where required by law.

7.1.5 Any person to whom we cede, delegate, transfer or assign any of our rights or obligations relating to our services or agreements, including a successor to our business.

7.1.6 Such other persons as may be permitted by applicable law or that you may consent to.

8. TRANSFERS OUTSIDE SOUTH AFRICA

8.1 Our sharing of your information may involve its transfer to third parties outside South Africa, for example where our service providers host or back up information in another country. Where this happens, we will only transfer your information as permitted by the Protection of Personal Information Act 4 of 2013, and we will require that the recipient protects your information to a standard substantially similar to that required by that Act. Information processed on our platform is held primarily in Amazon Web Services Africa (Cape Town), with encrypted disaster-recovery backups in Amazon Web Services Europe (Ireland). We rely on section 72(1)(a) of that Act for that transfer, on the basis of binding contractual terms with Amazon Web Services that require an adequate level of protection and that control any onward transfer.

9. SECURITY

9.1 We will strive at all times to ensure that your records are protected against unauthorised or accidental access, processing or loss. We maintain this commitment by implementing appropriate, reasonable technical and organisational measures to safeguard and secure your information, including appropriate cryptographic techniques and access control mechanisms. If we use a third party to host, manage or process your information on our behalf, we will require that third party to implement appropriate, reasonable technical and organisational measures as well.

9.2 If we believe that unauthorised access to your information may have occurred, we will notify the Information Regulator, as section 22 of the Protection of Personal Information Act 4 of 2013 requires, and we will notify you as soon as reasonably possible, in writing, using the contact details we have for you, unless a public body responsible for the detection or investigation of offences requires us to delay notifying you. We will give you such information as you may reasonably require to take protective measures.

10. OUR WEBSITE

10.1 Our website does not use cookies or similar tracking technologies, and we do not use it for advertising or to track you across other websites. Like most websites, our web server automatically records basic technical information each time a page is requested, such as your IP address, the page requested, whether the request was successful and the browser used. We use this information only to operate and secure the website and to understand, in aggregate, how it is used.

10.2 If you send us a message through the contact form, we use the details you provide only to respond to you. Our website is intended for businesses and is not directed at children.

11. YOUR RIGHTS REGARDING YOUR INFORMATION

11.1 Provided that you give us suitable and adequate proof of your identity, you have the right:

11.1.1 To know which records we hold about you.

11.1.2 If our right to process your personal information requires your consent, to withdraw that consent at any time. This will not affect the lawfulness of processing which occurred before the withdrawal.

11.1.3 To object to the processing of your personal information, as described in clause 12.

11.1.4 To require us to correct, erase or cease processing information or records we hold about you that we require your consent to process, that we are no longer permitted to retain, or that are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained.

11.2 You can exercise any of these rights by contacting us directly, including by submitting a written request by email to privacy@orbitloyalty.co.za. A request to correct or delete personal information must be made on Form 2 prescribed under the regulations made under the Protection of Personal Information Act 4 of 2013, or on a form substantially similar to it. We will provide that form free of charge on request, and it is also available on the Information Regulator's website at www.inforegulator.org.za. We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that applicable law prohibits it or provides a lawful ground for refusing it. Please note that we may require a reasonable period to comply with your request. Formal requests for access to records may also be made in terms of the Promotion of Access to Information Act 2 of 2000, as set out in our PAIA manual, which is available on our website.

12. OBJECTIONS

12.1 Please email us at privacy@orbitloyalty.co.za if you want to object to our processing of your information. An objection must be made on Form 1 prescribed under those

regulations, or on a form substantially similar to it. We will provide that form free of charge on request, and it is also available on the Information Regulator's website. Where you object on reasonable grounds to processing that we carry out in pursuit of our legitimate interests, we will stop that processing unless the law requires or permits us to continue. Please note that we may require a reasonable period to give effect to your objection.

13. COMPLAINTS

13.1 If you are unhappy with how we have handled your personal information, please contact us first so that we can try to resolve the matter. You also have the right to lodge a complaint with the Information Regulator of South Africa:

Information Regulator (South Africa)
Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
POPIA complaints: POPIAComplaints@inforegulator.org.za
General enquiries: enquiries@inforegulator.org.za | 010 023 5200
www.inforegulator.org.za

14. CHANGES TO THIS POLICY

14.1 We may update this policy from time to time. The latest version will always be available on our website, together with the date on which it was last updated.