

PRIVACY POLICY

Eurolux Privacy Policy

Protecting your privacy is important to us. The Protection of Personal Information Act (**POPI**) is aimed at protecting your personal information and prescribes what we can and cannot do with it.

We are committed to protecting your personal information and ensuring that your personal information is processed in a manner that complies with POPI. Eurolux will comply with conditions 8 of the POPI Act. Eurolux will have a "Privacy Notice" for "Data Subjects", setting out how your personal information will be used. This will be available on request.

This privacy policy is hereby incorporated into and forms part of our agreement with you. It explains how we deal with your personal information. You must read this privacy policy together with our Terms and Conditions. This privacy policy applies to all personal information that Eurolux collects from you.

Consent

By using our website, you are consenting to us collecting, using and disclosing your personal information in accordance with this privacy policy. **If you do not agree to the collection, use and disclosure of your personal information in this way, you will not be able to use our website.**

We may ask you to provide additional consents if we need to use your personal information for purposes not covered by this privacy policy. You are not obliged to provide such consent but if you decide not to then your participation in certain activities may be restricted. If you provide additional consent, the terms of that consent will prevail in the event of any conflict with the terms of this privacy policy.

This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At Eurolux we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

Direct Marketing Consent

By using our website you agree to us using your personal information to approach you for the purpose of marketing Eurolux and its products and services. If you do not agree it will not stop you from using this website. You are free to unsubscribe from any marketing material at any stage. If you have any questions in this regard, please contact us directly at admin@eurolux.co.za.

Changes to our Privacy Policy

From time to time, we may have to amend this privacy policy to accommodate changes in our business or services or where legal requirements change. If you have any questions in this regard, please contact us directly at admin@eurolux.co.za.

How We Collect and Use Information

In addition to what is described elsewhere in this privacy policy, we collect and use your personal information to provide products and services to you, to help us improve our website, to help us improve our products and services, to transact with you, to administer your account, to communicate with you, to engage with you on social networks, and to provide support to you.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or service from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide us and what information is optional.

If you do not wish to provide us with personal information that is mandatory, we may not be able to do business with you or otherwise assist you.

Definition of Personal Information

According to the POPI Act "**Personal Information**" means information relating to an identifiable. Living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

<https://www.gov.za/>

We collect the following types of information from you:

Information you provide us directly:

We ask for certain information such as your username, real name, birthdate, address, phone number and e-mail address when you register for an Eurolux account, or if you purchase goods from us. We may also retain any messages you send through the services on the website (Service), and may collect information you provide in user content that you post to the Service. We use this information to operate, maintain, and provide to you the features and functionality of the Service. Your username and, if you choose to disclose it, your real name, will be published publicly if you write a review on a product.

Information we may receive from third parties:

We may receive information about you from third parties. For example, if you access our website or Service through a third-party connection or log-in (for example, through Facebook Connect, by "following," "liking," adding the Eurolux application that third party may pass certain information about your use of its service to Eurolux . This information could include, but is not limited to, the user ID associated with your account (for example, your Facebook UID), an access token necessary to access that service, any information that you have permitted the third party to share with us, and any information you have made public in connection with that service. If you allow us access to your friends list, your friends' user IDs, and your connection to those friends by making it public, may be used and stored to make your experience more social, and to allow you to invite your friends to use our Service as well as provide you with updates if and when your friends join Eurolux . You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to Eurolux. You may also unlink your third party account from the Service by adjusting your settings on the third party service.

Inviting a friend to use Eurolux :

Eurolux may, in its sole discretion, develop a feature that allows you to invite third parties to the Service. If you choose to use our invitation service to invite a third party to the Service through our "Invite friends" feature, you may directly choose a friend to invite through your mobile device's native contact list – but we do not require that you import your contacts list to the Service, and we do not retain the information contained in your contacts list. You understand that by inviting a friend to Eurolux through the "Invite friends" feature, you are directly sending a text or email from your personal accounts and that we are not storing your contact list. In addition, you understand and agree that normal carrier charges apply to communications sent from your phone. Since this invitation is coming directly from your email or phone, we do not have access to or control this communication.

Analytics information:

We may directly collect analytics data, or use third-party analytics tools and services, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving the Service. We collect and use this

analytics information in aggregate form, such that it cannot reasonably be manipulated to identify any particular individual user.

Cookies information:

When you visit the Service, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets Eurolux help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the Service), and allow us, or our business partners, to track your usage of the Service over time. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Service may not function properly if the ability to accept cookies is disabled.

Log file information:

Log file information is automatically reported by your browser or mobile device each time you access the Service. When you use our Service, our servers automatically record certain log file information. These server logs may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information.

Clear gifs/web beacons information:

When you use the Service, we may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service.

Device identifiers:

When you access the Service by or through a mobile device (including but not limited to smart-phones or tablets), we may access, collect, monitor and/or remotely store one or more "device identifiers," such as a universally unique identifier ("UUID"). Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by Eurolux. A device identifier may convey information to us about how you browse and use the Service. A device identifier may remain persistently on your device to help you log in faster and enhance your navigation through the Service. Some features of the Service may not function properly if use or availability of device identifiers is impaired or disabled.

Location data:

When you access the Service by or through a mobile device, we may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device. Location data may convey to us information about how you browse and use the Service. Some features of the Service, particularly location-based services, may not function properly if use or availability of location data is impaired or disabled.

Commercial communications:

We use your information to send you shopping and Service-related emails (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). You may not opt out of Service-related emails.

Use of certain service type information we collect about you:

We use or may use cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalised content and information; (c) provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems; (f) help you efficiently access your information after you sign in; (g) provide advertising to your browser or device, and (h) automatically update the Eurolux application on your mobile devices.

Sharing of Your Information

* Who we may share your information with: We may share your information with our group companies (including any parent, subsidiaries and affiliates), third-party business partners and Trusted Users (including Eurolux Marketing and its web developer) for the purpose of providing the Service to you. Third party business partners will be given limited access to your information as is reasonably necessary to deliver the Service, and we will require that such third parties comply with this Privacy Policy, or operate under a similar privacy policy.

* Who can see user content: Any user content that you voluntarily disclose for posting to the Service becomes available to the public and cannot be removed, except by Eurolux in its sole discretion. Once posted on Eurolux, user content may not be removable from public view, as copies may remain viewable in cached and archived pages of the Service, on other sites that have republished us, or if other Users have copied or saved that information. If you do not wish your user content to be available to the public, please do not post it on the Service. Your username and, if you choose to disclose it, your real name, will be published publicly. Once published your username and / or real name may not be able to be removed from the internet generally.

* Who can see your IP address: If you post user content on the Service while not logged in, your IP address will be published with your user content in order to attribute your contribution to the Service. A selection of Trusted Users with administrative powers in Eurolux have the ability to review IP addresses of users to reduce abusive behaviour. Any third party service embedded on Eurolux such as an advertiser, video provider, social network or other third party will also have access to your IP address.

* Who can see your email address: If you enter an email address, you will enable communications from Eurolux and other users (provided that communications from other users will only be enabled if you participate in group discussions, when submitting RMA's or by submitting an online enquiry). If you reply to users, or participate in group Eurolux activities such as meet-ups, your email address will be shared with these users. In addition, emails sent to some email addresses such as info@eurolux.co.za are received by a group of Trusted Users, who will use your email address to reply to the email.

What happens in the event of a change of control:

We may buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. Your information such as customer names and email addresses, User Content and other user information related to the Service may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.

Instances where we are required to share your information:

Eurolux will disclose your information where required to do so by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms and Conditions or to protect the security, quality or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of Eurolux, our users, or others.

Sharing certain service type information we collect about you:

We may share certain service type information, including information obtained through tools such as cookies, log files, device identifiers, location data and clear gifs (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with our third-party business partners for the purposes described in the section above on "How We Collect and Use Information." We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, de-identified data with third parties.

Third Party Ads on the Eurolux Website:

The Eurolux Privacy Policy does not apply to, and we cannot control the activities of, third-parties. Please consult the respective privacy policies of such third parties or contact such third parties for more information.

How We Store and Protect Your Information

Storage and Processing:

Your information collected through the Service may be stored and processed in South Africa or any other country in which Eurolux or its subsidiaries, affiliates, or service providers maintain facilities. Eurolux may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world.

Keeping your information safe:

Eurolux cares about the security of your information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the Service. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from Eurolux, at all times. However, Eurolux cannot ensure or warrant the security of any information you transmit to Eurolux or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed. Your privacy settings may also be affected by changes to the functionality of third party sites and services. Eurolux is not responsible for the functionality or security measures of any third party.

Compromise of information:

In the event that any information under our control is compromised as a result of a breach of security, Eurolux will take reasonable steps to investigate the situation and where appropriate, subject to section 22 of POPI, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Your Choices about Your Information

We make every effort to promptly process all unsubscribe requests. As noted above, you may not opt out of Service-related communications (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). If you have any questions about reviewing or modifying your account information, you can contact us directly at admin@eurolux.co.za.

Opting out of collection of your information for Tracking / Advertising:

Please refer to your mobile device or browser's technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your mobile device. Note that disabling cookies and/or other tracking tools prevents Eurolux or its business partners from tracking your browser's activities in relation to the Service, and for use in targeted advertising activities by third parties. However, doing so may disable many of the features available through the Service. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at admin@eurolux.co.za.

How long we keep your private profile information:

Following termination of your User account, Eurolux may retain your private profile information for a commercially reasonable time for backup, archival, or audit purposes. For the avoidance of doubt, any information that you choose to make public on the service may not be removable from the internet generally.

Correction of your Personal Information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

Children's Privacy

Subject to instances of tacit emancipation of minors and / or ratification by their legal guardians, Eurolux does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register as users. The Service and its content are not directed at children under the age of 18. In the event that we learn that we have collected personal information from a child under age 18 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 18, please contact us at admin@eurolux.co.za.

Links to Other Websites and Services

We are not responsible for the practices employed by websites or services linked to or from the Service, including the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and we do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service (like Facebook, Google groups, or an IRC chatroom) and you allow such a third-party access to your User Content, you do so at your own risk.

Please note that we are entitled to refuse to delete your information in certain circumstances (including where, by law, we are required to maintain it). Further that the deletion of all of your personal information will probably necessitate the termination of any agreements that you have with us as we require some of your personal information to transact with you.