



OTT MOBILE TECHNOLOGIES (PTY) LTD PRIVACY NOTICE

Last Updated: 26.01.2026

Please read this Privacy Notice carefully to understand how we handle your Personal Data. If you object to any part of this Privacy Notice, please refer to the 'Contact us' section of this Notice, and provide reasons for your objection, as soon as possible.

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1. INTRODUCTION

- 1.1. This OTT Mobile Technologies Privacy Notice explains how and why OTT Mobile Technologies (Pty) Ltd, and all of its affiliated and associated entities within the Cliquefin Group (collectively the "Cliquefin Group Entities"), - see full list available at <https://cliquefin.com/>, ("OTT", "we", "us", or "our") collects and processes your 'personal data' as a 'data controller' in relation to the OTT Platform, as a computer application and technology company which facilitates a digital payments ecosystem ("the Services"). <https://cliquefin.com/>.
- 1.2. We may share your personal data with the Cliquefin Group Entities only for specific and defined purposes, including but not limited to: (i) facilitating and verifying payment transactions; (ii) fulfilling regulatory and compliance obligations (including anti-money laundering and fraud prevention); (iii) providing customer support and account management services; and (iv) maintaining and improving the functionality, security, and performance of the OTT Platform. Each Cliquefin Group Entity processes personal data in accordance with this Privacy Notice and applicable data protection laws.
- 1.3. This Privacy Notice complies with applicable Data Protection Laws, and specifically facilitates the obligations required from the Protection of Personal Information Act, No. 4 of 2013 ("POPIA") as well as the European Union General Data Protection Regulation, 2016/679 ("EU GDPR").
- 1.4. The definitions of terms used in this Notice shall have the same meaning as in the applicable Data Protection Laws and its cognate terms shall be construed accordingly.

2. APPLICATION OF PRIVACY NOTICE

- 2.1. This Privacy Notice applies to all processing of Personal Data carried out by OTT as Data Controllers for the purpose of conducting its business operations, including e-commerce activities related to the sale, purchase, and payment for goods through OTT's platform.
- 2.2. This Privacy Notice applies to the following external parties:
 - 2.2.1. our potential and existing clients;
 - 2.2.2. users of our website and / or platform;
 - 2.2.3. recipients of our Services; and
 - 2.2.4. suppliers and contractors ("Vendors");
- 2.3. Our commitments to job applicants, employees, and consultants are governed by separate privacy notices.

3. CONTACT US

- 3.1. For questions regarding this Privacy Notice, data protection rights, access to information rights, and any complaints, please contact our Information Officer or Deputy Information Officer at:
 - 3.1.1. [Information Officer](#)

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Ryan Muller

ryan@ott-mobile.com

3.1.2. Deputy Information Officer

Justin Course

justinc@ott-mobile.com

3.2. Further contact information and forms are attached to our PAIA Manual which is available on our website.

4. **PERSONAL INFORMATION COLLECTED**

In order to conduct its business and provide its services, OTT may collect the following personal data:

- 4.1 **Account information** - We collect the data you or your organization provide when creating an account or profile for the Services offered on our platform, such as:
 - 4.1.1 First and Last Name;
 - 4.1.2 Date of Birth;
 - 4.1.3 Citizenship;
 - 4.1.4 Passport / Identity Number;
 - 4.1.5 Email address;
 - 4.1.6 Contact number; and
 - 4.1.7 Gender.
- 4.2 **Payments and transaction details** - We keep reasonable business records of your charges, payments, financial information, billing details and issues.
- 4.3 **Platform settings and configurations** - We record your configuration and settings, including resource identifiers and attributes, server information, passwords, service and security settings for data and other resources.
- 4.4 **Your direct communications** - We keep records of your communications and interactions with us and our partners (for example, when you provide feedback, ask questions or seek technical support).
- 4.5 **Feedback** - We collect your personal data when you use our site forms or live chat. We further record your responses to our surveys or when submitting reviews, feedback forms, or complaints. Participation in surveys and feedback submissions is entirely voluntary. Where possible, responses are anonymized to protect individual identities.
- 4.6 **Technical and Usage Data** - We collect information about usage, operational status, software errors and crash reports, authentication details, quality and performance metrics, and other technical details necessary for us to operate and maintain the Services and related software. This information includes device identifiers, identifiers from cookies or tokens, IP addresses and any other data collected by way of automated technologies.



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- 4.7 OTT do not process special personal information or information relating to children in the ordinary course of business. We will only process special personal information only if we obtain your consent or have another valid justification to do so.

5 HOW DATA IS COLLECTED

- 5.1 **Direct (Voluntary) Interactions:** When you provide it directly to us, such as during user registration, account setup or when you submit support requests or enquiries.

5.2 **Automated Technologies:**

5.2.1 When you interact with our website, platform, or Services, we may collect technical and usage information automatically from your browser or device using cookies and similar technologies. This includes browsing data and cookies. For example, when you view our website, we can see:

5.2.1.1 what you click,

5.2.1.2 what you view,

5.2.1.3 how long you spend on pages,

5.2.1.4 your device and internet connection details such as type of device you are using, IP address and details about your internet connection, technical details such as your screen size and the software you are using, such as your web browser,

5.2.1.5 your country or region (not exactly where you are unless we ask permission), and

5.2.1.6 your unique advertising or other identification numbers allocated to your browser or device.

5.2.2 We do not often know exactly who you are from this data. But sometimes we may connect this data with other information we hold about you, for example, when you submit a 'Contact Us' request.

5.2.3 Cookies and similar technologies are set on your device by us and our trusted partners, such as Google Analytics.

To opt out of being tracked by Google Analytics across all websites, visit:
<http://tools.google.com/dlpage/gaoptout>.

- 5.3 **Third-Party Sources:** We will only receive your personal data from third parties when (i) you have provided your consent to share such data with us, (ii) when required by law, (iii) when it is strictly necessary for us to fulfil our contractual obligations to you, or (iv) when it is strictly necessary to protect our or our Customer's legitimate interests, or (v) to protect the vital interests of the data subject. These circumstances may include, but are not limited to:

5.3.1 **Third-party payment processors:** When processing your payments via payment gateways or payment processors, we may receive confirmation of payment or refund details from these providers to ensure successful completion of your transaction, and

- 5.3.2 **Public sources:** Public sources, such as Credit Bureau's, are used solely for verifying customer information during onboarding. We implement safeguards to ensure no over-collection or misuse of publicly available data.

6 PROCESSING PURPOSE

- 6.1 OTT undertakes to process Personal Data only to the extent and in such a manner as is necessary to provide the services.
- 6.2 OTT further undertakes to process Personal Data reasonably and is committed to processing Personal Data in an adequate and non-excessive manner.
- 6.3 OTT will process Personal Data for the following purposes:
- 6.3.1 **Consent** - Where required by law, we will obtain your explicit consent (opt-in) to process your Personal Data. You may opt-out and withdraw this consent at any time.
- 6.3.2 **Contract** – Upon your registration, acceptance of our terms and conditions and/or completion of your profile with us, a valid contract comes into existence in terms of which we provide our services to you. We process your Personal Data, when it is necessary to perform our obligations under a contract we have with you as a customer, including to:
- 6.3.2.1 To act on or respond to instructions or requests for the provision of vouchers, competitions, computer applications, technological and other related services;
- 6.3.2.2 receive and process your orders for specific Services. This includes processing Data as needed to bill for the Services used or to ensure those services are delivered or working as intended, to detect and avoid outages or other technical problems, and to secure your data and services;
- 6.3.2.3 provide you with customer support;
- 6.3.2.4 process your payments, service credits or refunds;
- 6.3.2.5 respond to inquiries or complaints you make about our products or services, or enforce and collect on any agreement we have with you when you're in default or breach our terms and conditions.
- 6.3.3 **Legal Obligations** - We process your Personal Data when required by law. For example, we may need to:
- 6.3.3.1 Verify your identity for compliance with the Consumer Protection Act or other legal requirements.
- 6.3.3.2 Retain transaction records for tax or regulatory purposes.
- 6.3.3.3 to process data subject access requests under applicable data protection laws;
- 6.3.3.4 to meet our record-keeping and data retention obligations;
- 6.3.3.5 to protect your vital interests or the vital interests of another natural person; and

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6.3.3.6 for any other related and lawful purposes brought to your attention from time to time.

6.3.4 **Legitimate Interests** - We process Personal Data under legitimate interests only where such interests are not overridden by the rights and freedoms of the data subject. We process your Personal Data when pursuing our legitimate interests to offer the best service we can, and ensure our customers know how to get the most out of our Services, and to improve our Services to meet our customers' needs. For example, we may process your Personal Data to:

6.3.4.1 answer any requests or questions you might have;

6.3.4.2 make recommendations to optimise the use of the Services, and provide information about new or related products and features;

6.3.4.3 use secure and effective third-party technology platforms to administer and manage the Services, our technology, and our infrastructure and communication systems;

6.3.4.4 prevent fraud, enhance security, and protect against unauthorized access to your account or our systems;

6.3.4.5 maintain the safety, security and integrity of the Services, our intellectual property, databases, networks, and other technology assets;

6.3.4.6 protect our rights in any litigation that may involve you;

6.3.4.7 perform general due diligence and risk assessments;

6.3.4.8 enforce and defend other legal claims;

6.3.4.9 manage business continuity incidents and emergencies;

6.3.4.10 determine the effectiveness of our sales, marketing, and advertising;

6.3.4.11 analyse and gather metrics to better understand how Customers and potential clients use our Services; and

6.3.4.12 achieve purposes otherwise described to you when collecting your data.

7 CONSEQUENCES OF FAILURE TO PROVIDE THE INFORMATION

If we are legally required to process certain Personal Data or need to do so under a contract with you, failure to provide the requested data (e.g., identification verification documents) may prevent us from fulfilling our contractual obligations. In such cases, we may be unable to proceed with or continue the contract and may have to terminate the agreement and/or our relationship with you. Any termination will be carried out with due notice and in accordance with the terms of the contract and applicable legislation.



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8 PERSONAL INFORMATION SHARING

- 8.1 We may share your Personal Data with OTT Personnel or Suppliers/Vendors who perform technical services for us or on our behalf and under our instruction or authority as 'Processors' for the purposes listed under "Processing Purpose".
- 8.2 We do not share Personal Data with companies, organizations, or individuals outside of OTT except in the following cases:
- 8.2.1 With your consent;
 - 8.2.2 for external processing. We share Personal Data with trusted third-party providers to process it for us as we instruct them to in accordance with a contractual arrangement and in compliance with this Privacy Notice and appropriate confidentiality and security measures. For example:
 - 8.2.2.1 billing data is shared with payment processors, vendors and suppliers, while technical details may be shared with server hosts, password managers, data centres and cloud service providers for troubleshooting purposes;
 - 8.2.2.2 Personal Data is shared with our third-party providers when you request technical support services. We share the information you provide in the support ticket, and those providers may communicate with you or your administrator in that ticket, including providing updates and closing the ticket;
 - 8.2.2.3 we share your contact details to enable communication and collaboration when you request professional services; and
 - 8.2.2.4 Personal Data may be shared with backup and disaster recovery related service providers or software, as required.
 - 8.2.3 for legal reasons. We share Service Data outside of OTT when we have a good-faith belief that access to, or disclosure that Service Data is reasonably necessary to:
 - 8.2.3.1 comply with applicable law, regulation, legal process, or enforceable governmental requests,
 - 8.2.3.2 enforce applicable agreements we have entered with you, including to investigate potential violations, detect, prevent, or otherwise address fraud, security or technical issues, or
 - 8.2.3.3 protect and defend the rights, property or safety of OTT, our customers, users, employees, contractors, suppliers, service providers, the public or any third party, as required or permitted by law.

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9 STORAGE AND CROSS BORDER TRANSFER OF PERSONAL INFORMATION

- 9.1 Your Service Data will be primarily stored and processed in the Republic of South Africa ("RSA") where OTT operates.
- 9.2 OTT will not transfer personal information about a Client to a third party who is in a foreign country unless the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection that is the same or substantially similar to the level of protection offered by POPIA.
- 9.3 If OTT is required to transfer Personal Data outside of South Africa to servers, service providers or third parties located in foreign territories, OTT undertakes to:
- 9.3.1 Ensure such territories will be governed by data protection laws which, in the sole opinion of OTT, adequately protect personal information; or
 - 9.3.2 if the foreign territory has inadequate data protection laws, OTT will make reasonable efforts to enter binding agreements with the recipient to ensure adequate safeguarding measures are in place to protect the transferred personal information.
- 9.4 When transferring Personal Data outside of RSA, we have implemented appropriate safeguards as required by the POPIA and other applicable data protection laws, including but not limited to:
- 9.4.1 Transfer Impact Assessments ("TIA"): We conduct TIAs before any cross-border data transfer takes place to a territory with inadequate data protection laws. TIAs help identify and mitigate potential risks associated with the transfer of Personal Data to non-RSA countries, ensuring compliance.
 - 9.4.2 Standard Contractual Clauses ("SCCs"): Ensure that we, as the Data Controller, have SCCs in place when transferring Personal Data to non-RSA countries or to third-party Processors outside these territories. These clauses serve as legally binding agreements that guarantee the protection of Personal Data at the same level as within RSA.
 - 9.4.3 Encryption of data: Encrypting Personal Data before transfer helps to ensure that it cannot be accessed by unauthorised parties.
- 9.5 OTT may also transfer the personal information of a Client to a third party who is in a foreign country in the following circumstances where:
- 9.5.1 the Data Subject explicitly consents to the transfer; or
 - 9.5.2 Where the transfer is necessary for the performance of a contract between the Client and OTT (This derogation can only be used if the data subject is a party to the contract);
 - 9.5.3 Personal data may be transferred to a third country if the transfer is necessary for important reasons of public interest;
 - 9.5.4 Personal data may be transferred to a third country if the transfer is necessary to protect the data subject's vital interests;

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9.6 For more information about the safeguards we implement to protect your Personal Data during international transfers, please contact our Information Officer.

10 SECURITY SAFEGUARDS

10.1 OTT has implemented appropriate security measures which are required in order to protect all Personal Data that it holds from and against loss, damage, unauthorised destruction, unlawful access and processing, such as:

10.1.1 Access control: Restricting access to your Service Data to OTT employees, contractors, and agents who need it to perform their duties for us. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations,

10.1.2 Secure Storage and Encryption: Ensuring Service Data is securely stored according to reasonable industry standards and Encrypting Service Data at rest and while in transit between our facilities,

10.1.3 Review: Regularly reviewing our processing practices and systems for vulnerabilities and implementing updates and patches to secure our infrastructure,

10.1.4 Incident management: Implementing a response plan to quickly address and mitigate any data breaches or security incidents.

10.2 While OTT takes all reasonable efforts to safeguard the personal information which it holds, it cannot be held responsible for any loss or unauthorised processing of personal information beyond OTT's reasonable control.

10.3 If we become aware of a data breach that may compromise your Personal Data, we will notify you and the relevant regulatory authorities in accordance with applicable legal requirements.

10.4 OTT further undertakes to promptly take action, at its own reasonable expense, to investigate any such suspected breach and to identify, prevent, and mitigate the effects of any such breach.

11 LINKS TO THIRD PARTY SERVICES

OTT Services may contain links to third-party platforms or websites outside of OTT's control. OTT is and is not responsible for the content, privacy or security of these other third-party controlled platforms. We encourage you to read the privacy policies of any third-party websites or platforms you interact with.

12 DATA RETENTION

12.1 OTT will only retain your Personal Data for as long as is necessary to achieving the purposes for which the information was collected, stored, transferred, used, processed or as required by law.

12.2 The retention period is determined by various factors, including:

12.2.1 The type of data and its sensitivity.



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12.2.2 The purposes for which the data was collected and whether those purposes can still be achieved.

12.2.3 How you configure your settings.

12.2.4 Legal obligations that may require us to retain certain data for a specific period (e.g., tax laws, accounting regulations, or litigation holds).

12.3 Once we determine that your Personal Data is no longer necessary for the purpose it was collected and / or there are no other lawful grounds for us to continue processing it, we will securely delete, destroy, or anonymize it, ensuring that it is no longer identifiable.

13 DATA SUBJECT PARTICIPATION AND INFORMATION QUALITY

13.1 Where we act as a Data Controller, we are required to take all necessary steps to ensure that your Personal Data is accurate, complete, relevant not misleading, and up to date.

13.2 Any Data Subject whose Personal Data we maintain may request, in the prescribed manner:

13.2.1 To inspect and, if necessary, correct the Personal Data held by us. It is your responsibility to inform us should your Personal Data be incorrect, incomplete, irrelevant, misleading or out-of-date by contacting us.

13.2.2 The deletion or destruction of a record of Personal Data.

13.3 Such requests must be submitted using the prescribed form which is available in our Access to Information Manual. A copy of this Manual is available on our website.

13.4 We may require additional information from the requesting party to confirm the legitimate basis for the request and your identity and authority to do so. Upon receipt and verification of the corrected Personal Data, we will adjust or delete our information or records accordingly.

14 PROMOTIONAL CAMPAIGNS

14.1 In the event you enter any of OTT's promotional competitions offered via its platform, OTT will collect and process your personal information for the purposes of the competition. This will include communication from OTT and OTT's partners about the competition and other product offerings.

14.2 We refer you to the relevant competition rules, terms and conditions which will notify you of any further or additional processing of your personal information.

14.3 In the event of any marketing activity, such as publishing photographs of winners, OTT will obtain your consent.

14.4 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 support@ott-mobile.com.

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15 REVISION OF POLICY

OTT reserves the right to and may update or amend this Privacy Notice from time to time, and we will take reasonably practicable steps to inform you when changes are made. Without limiting the manner in which we may inform you, we may notify you by email, or by posting on our website and OTT. By continuing to use OTT or any of the other OTT services following any updates or amendments, you will be deemed to have consented to such changes.

16 DATA SUBJECT ACCESS RIGHTS

You have several rights in relation to the Personal Data that we hold about you, as provided for in the applicable data protection laws, you have the right to:

- 16.1 Request access to your personal information – You may ask us free of charge to confirm that we hold your personal information, or ask us to provide you with details, at a fee, how we process your personal information.
- 16.2 Request the correction of your personal information – to ensure any incomplete or inaccurate personal information is corrected.
- 16.3 Request erasure of your personal information – where there is no lawful basis for the retention or continued processing of your personal information.
- 16.4 Object to the processing of your personal information for a legitimate interest (or those of a third party) – reasonable grounds relating to your particular situation unless legislation provides for such processing.
- 16.5 Request restriction of processing of your personal information – to restrict or suspend the processing of your information to limited circumstances.
- 16.6 in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or ask that we send it to a third party.
- 16.7 Lodge a complaint – to our Information Officer. If you believe our attempts to resolve the issue have been inadequate, alternatively, you can file a complaint with the Information Regulator. Complaint Forms and procedures are available on the Information Regulator’s website.
- 16.8 Institute civil legal proceedings – regarding the alleged interference with the protection of your personal information.
- 16.9 Withdraw consent given for the processing of your personal information at any time – where we rely on your consent to process certain personal information for a specific purpose, you can withdraw your consent at any time. This will not affect the continued processing of your personal information in instances where we have another legitimate reason for doing so.
 - 16.9.1 To withdraw your consent – email our Information Officer. In the body of your email, please refer to the specific activity and type of personal information which you no longer consent to OTT collecting or using.
- 16.10 All requests and objections must be submitted to our Information Officer using the contact details listed under “Contact Us”.

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16.11 On receipt of a request/objection, we will respond within 30 calendar days. If consent is withdrawn, we will acknowledge this action as soon as reasonably practicable.



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