

Loyalty Expert Rewards – Privacy Policy

PRIVACY POLICY

LoyaltyExpert Rewards

Last updated: 15 December 2025

This Privacy Policy is issued by **LoyaltyExpert Rewards**, operated by **ROOCORP Holdings** ("we", "us", "our"). This document constitutes an electronic record and is legally binding under applicable electronic communications and data protection laws.

This Privacy Policy applies to all users of the LoyaltyExpert Rewards platform, including websites, mobile applications, APIs, short codes, integrated systems, and related services (collectively, the **"Platform"**).

By accessing, registering, or using LoyaltyExpert Rewards, you confirm that you have read, understood, and agreed to this Privacy Policy.

1. LEGAL FRAMEWORK & COMPLIANCE

This Privacy Policy is drafted to comply with applicable data protection and privacy laws, including but not limited to:

- **South Africa:**
 - Protection of Personal Information Act, 4 of 2013 (**POPIA**)
 - Electronic Communications and Transactions Act (**ECTA**)
 - Financial Intelligence Centre Act (**FICA**), where applicable
- **Africa (where applicable):**
 - African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention)
 - National data protection laws of applicable African jurisdictions

Where local laws impose stricter requirements, those laws shall prevail.

2. PURPOSE OF THIS POLICY

This Policy explains:

- What personal information we collect
- How and why we use such information

- How information is stored and protected
 - Your rights as a data subject
 - How you can access, correct, or delete your information
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3. INFORMATION WE COLLECT

3.1 Personal Information

We may collect the following categories of personal information:

Individuals:

- Full name
- Identity number or passport number (where legally required)
- Email address
- Mobile number
- Physical and postal address
- Language preference

Businesses (KBC / KYB / AML):

- Registered business name
- Registration number
- VAT or tax number
- Business address
- Directors, members, or beneficial owners
- Proof of business registration

Technical & Usage Data:

- IP address
 - Device type, operating system, and app version
 - Login timestamps and geolocation (where enabled)
 - Transaction history and loyalty activity
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4. HOW WE COLLECT INFORMATION

Information is collected when you:

- Register on the Platform
 - Participate in loyalty programs
 - Redeem rewards or promotions
 - Contact customer support
 - Use SMS, USSD, short codes, or mobile applications
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5. USE OF PERSONAL INFORMATION

We process personal information lawfully and only for legitimate purposes, including:

- Account creation and management
- Loyalty points issuance, redemption, and reporting
- Fraud prevention and security monitoring
- Regulatory compliance (including AML/KYC where applicable)
- Customer communication and support
- Platform analytics and improvement
- Marketing communications (subject to consent)

We do **not** sell personal information to third parties.

6. CONSENT & LAWFUL PROCESSING

We process personal information based on:

- Your consent
- Performance of a contract
- Legal obligations
- Legitimate business interests

You may withdraw consent at any time, subject to legal and contractual limitations.

7. DATA SHARING & DISCLOSURE

We may share information with:

- Authorized service providers (cloud hosting, SMS gateways, analytics)
- Loyalty partners and merchants (only necessary data)
- Regulators, law enforcement, or courts when legally required

All third parties are bound by confidentiality and data protection obligations.

8. CROSS-BORDER DATA TRANSFERS

Where data is transferred outside South Africa or your country of residence:

- We ensure adequate data protection safeguards
 - Transfers comply with POPIA and applicable African laws
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9. SECURITY MEASURES

We implement reasonable technical and organisational safeguards, including:

- SSL encryption
- Access controls and authentication
- Secure cloud infrastructure
- Firewalls and intrusion monitoring
- Role-based access to data

Despite best efforts, no system is completely secure. You acknowledge this risk.

10. DATA RETENTION

We retain personal information only for as long as:

- Required by law
- Necessary for contractual purposes
- Needed for legitimate business operations

Thereafter, data is securely deleted or anonymised.

11. YOUR RIGHTS (DATA SUBJECT RIGHTS)

You have the right to:

- Access your personal information
- Request correction or deletion
- Object to processing
- Withdraw consent
- Lodge a complaint with the Information Regulator (South Africa)

Requests may be sent to: **support@loyaltyexpert.co.za**

12. COOKIES & ANALYTICS

We use cookies and analytics tools to improve user experience. You may manage cookie preferences via your browser or device settings.

Third-party analytics providers operate under their own privacy policies.

13. CHILDREN'S PRIVACY

LoyaltyExpert Rewards is **not intended for children under 18** without parental or legal guardian consent.

We do not knowingly collect personal information from minors.

14. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. Continued use of the Platform constitutes acceptance of the updated policy.

15. GRIEVANCE & CONTACT DETAILS

For questions, complaints, or data requests, contact:

Information Officer

LoyaltyExpert Rewards

Email: support@loyaltyexpert.co.za or info@roocorp.co.za

By using LoyaltyExpert Rewards, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.