

PRIVACY POLICY

This Privacy Policy ("Privacy Policy") describes how Gameplan Sport (Pty) Ltd ("we", "us", or "our") collects, uses, stores, discloses, and protects your personal information when you interact with our Website (www.gameplansport.co.za), purchase Products, or register for Events. This Privacy Policy is governed by the Protection of Personal Information Act 4 of 2013 ("POPIA") and, to the extent applicable, the General Data Protection Regulation (EU) 2016/679 ("GDPR"). By using our Website or services, you consent to the practices described herein.

1. DATA CONTROLLER / RESPONSIBLE PARTY

1.1 The responsible party (data controller) for the purposes of POPIA and GDPR is:

Gameplan Sport (Pty) Ltd
CIPC Registration No: 2020/873133/07
VAT Registration No: 4230318760
7 Watsonia Place, Forest Hills, Kloof, Durban, South Africa
Attention: Gerhard (Gerry) Smith, Director
Tel: +27 71 762 5029
Email: gerry.smith@gameplansport.co.za
Website: www.gameplansport.co.za

1.2 The Company's Information Officer, as required under POPIA, is Gerhard (Gerry) Smith (Director), contactable at gerry.smith@gameplansport.co.za or +27 71 762 5029.

2. PERSONAL INFORMATION WE COLLECT

We collect the following categories of personal information:

2.1 Information You Provide Directly

- Identity information: full name, date of birth, gender, nationality.
- Contact information: email address, telephone number, postal and delivery address.
- Account information: username, password (stored in hashed form), account preferences.
- Order information: products purchased, quantities, order history, payment status.
- Payment information: billing address, payment method type (we do not store full card numbers).
- Health and disability information: type of disability, physical measurements, medical conditions, and fitness levels – collected only where necessary for Adaptive Sports Equipment fitting or Event participation safety assessments.
- Event registration information: emergency contact details, next of kin, dietary requirements, travel documentation details.

- Communications: records of correspondence with us, including support queries and feedback.

2.2 Information Collected Automatically

- Technical information: IP address, browser type and version, operating system, device identifiers.
- Usage information: pages visited, time spent on pages, click-through data, search queries, referring URLs.
- Cookie data: as described in Section 7 of this Policy.
- Transaction data: time and date of transactions, purchase amounts.

2.3 Information Received from Third Parties

- Payment processors: transaction confirmation and fraud signals (not full card details).
- Social login providers: where you choose to log in via a social network, we receive your name and email address from that provider.
- Marketing partners: where you have consented to data sharing with our partners.
- Event co-organisers: participant information shared for joint events or tours.

3. PURPOSES OF PROCESSING AND LEGAL BASIS

We process your personal information only for legitimate purposes and where a valid legal basis exists. The following table sets out our processing purposes and the corresponding legal basis under POPIA and GDPR:

Processing Purpose	Categories of Data	Legal Basis
Order fulfilment and delivery of Products	Identity, contact, order, payment	Contractual necessity
Event registration and management	Identity, contact, health, event registration	Contractual necessity; consent (health data)
Payment processing	Payment, identity, billing	Contractual necessity
Customer support and dispute resolution	Identity, contact, communications	Contractual necessity; legitimate interests
Website operation and security	Technical, usage, cookies	Legitimate interests
Marketing and promotional communications	Identity, contact, order history	Consent (opt-in); legitimate interests (existing customers)
Personalisation of user experience	Usage, order history, preferences	Consent; legitimate interests
Legal compliance and fraud prevention	Identity, payment, technical	Legal obligation; legitimate interests
Analytics and service improvement	Usage, technical (anonymised where possible)	Legitimate interests
Health and safety management for Events	Health, identity, emergency contacts	Vital interests; consent

4. SPECIAL CATEGORIES OF PERSONAL INFORMATION

- 4.1** Health and disability information constitutes a "special category" of personal information under POPIA and GDPR and is afforded heightened protection.
- 4.2** We collect health and disability information only where:
- It is necessary for the safe fitting and use of Adaptive Sports Equipment;
 - It is necessary for the safe management of Event participation; or
 - You have provided explicit, informed consent.
- 4.3** Health information is stored securely, access is restricted to authorised personnel on a need-to-know basis, and it is never sold or shared with third parties for commercial purposes.
- 4.4** You may withdraw consent to the processing of health information at any time; however, doing so may prevent us from providing certain Products or Event services safely.

5. DISCLOSURE OF PERSONAL INFORMATION

- 5.1** We do not sell, rent, or trade your personal information. We may share your personal information with the following categories of third parties, strictly for the purposes described in this Policy:
- Payment processors and banks: to facilitate payment transactions.
 - Logistics and courier providers: to deliver Products to you.
 - Event co-organisers, venue operators, and activity providers: to facilitate Event participation.
 - Tour operators and accommodation providers: for the management of sports tours.
 - IT and cloud service providers: for website hosting, data storage, and customer relationship management.
 - Analytics providers: for anonymised website usage analysis.
 - Legal and professional advisors: where required for legal or regulatory compliance.
 - Regulatory authorities and law enforcement: where required by law, court order, or to protect the rights and safety of the Company or third parties.
- 5.2** All third-party recipients are contractually required to process your personal information only as instructed and in accordance with applicable data protection laws.
- 5.3** Where personal information is transferred outside of South Africa, we will take appropriate safeguards as required by Section 72 of POPIA, including obtaining adequate protection commitments from recipients.

6. DATA RETENTION

- 6.1** We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law.
- 6.2** The following general retention periods apply:
- Account information: retained for the duration of the account relationship and for five (5) years thereafter.
 - Transaction and order records: seven (7) years, as required by South African tax legislation.
 - Event registration and health information: three (3) years after the Event date.
 - Marketing consent records: for the duration of the marketing relationship and for two (2) years thereafter.
 - Technical and usage logs: twelve (12) months, unless required for security investigations.
- 6.3** Upon expiry of the applicable retention period, personal information will be securely deleted or anonymised.

7. COOKIES AND TRACKING TECHNOLOGIES

- 7.1** Our Website uses cookies and similar tracking technologies to enhance your browsing experience, analyse usage, and deliver relevant content.
- 7.2** We use the following categories of cookies:
- Strictly necessary cookies: essential for the operation of the Website (e.g., session management, shopping cart). These cannot be disabled.
 - Performance and analytics cookies: help us understand how visitors interact with the Website (e.g., Google Analytics). These are anonymised where possible.
 - Functional cookies: remember your preferences and settings to personalise your experience.
 - Targeting and marketing cookies: used to deliver relevant advertisements and track campaign effectiveness. These require your consent.
- 7.3** You may manage your cookie preferences through the cookie consent banner displayed on your first visit to the Website, or by adjusting your browser settings. Note that disabling certain cookies may affect Website functionality.
- 7.4** For more information about the specific cookies we use and how to manage them, please see our Cookie Policy, available on the Website.

8. YOUR RIGHTS

Subject to applicable law, you have the following rights in respect of your personal information. To exercise any of these rights, please contact us at gerry.smith@gameplansport.co.za.

Right of Access: You have the right to request a copy of the personal information we hold about you (commonly known as a "PAIA request" under the Promotion of Access to Information Act 2 of 2000).

Right to Rectification: You have the right to request correction of inaccurate or incomplete personal information.

Right to Erasure ("Right to be Forgotten"): You may request deletion of your personal information where it is no longer necessary for the purpose for which it was collected, or where you have withdrawn consent and there is no other legal basis for processing.

Right to Restriction: You may request that we restrict processing of your personal information in certain circumstances (e.g., while a dispute is pending).

Right to Data Portability: Where processing is based on your consent or contract, and carried out by automated means, you may request that your data be provided to you in a structured, machine-readable format.

Right to Object: You may object to processing based on legitimate interests or for direct marketing purposes at any time.

Right to Withdraw Consent: Where processing is based on your consent, you may withdraw that consent at any time, without affecting the lawfulness of processing prior to withdrawal.

Right to Lodge a Complaint: You have the right to lodge a complaint with the Information Regulator of South Africa (www.inforegulator.org.za) if you believe we have processed your personal information unlawfully.

- 8.1** We will respond to all data rights requests within thirty (30) days of receipt. Where the request is complex or numerous, we may extend this period by a further thirty (30) days, in which case we will notify you of the extension.
- 8.2** We reserve the right to verify your identity before processing any data rights request.

9. INFORMATION SECURITY

- 9.1** We implement appropriate technical and organisational measures to protect your personal information against unauthorised access, accidental loss, destruction, or disclosure. These measures include:
 - Encryption of personal information in transit (TLS/SSL) and at rest where appropriate.
 - Access controls restricting personal information to authorised personnel on a need-to-know basis.
 - Regular security assessments and penetration testing.
 - Staff training on data protection obligations.
 - Incident response procedures for managing data breaches.
- 9.2** In the event of a data breach that poses a risk to your rights and freedoms, we will notify the Information Regulator and affected individuals as required by POPIA within a reasonable timeframe.
- 9.3** No method of electronic transmission or storage is completely secure. While we take all reasonable precautions, we cannot guarantee absolute security of your personal information.

10. CHILDREN'S PRIVACY

- 10.1** Our Website and services are not directed at children under the age of eighteen (18). We do not knowingly collect personal information from minors.
- 10.2** Where a child participates in an Event or uses a Product, the parent or legal guardian must register on the child's behalf and provide all required consents. By registering a minor, the parent or guardian warrants that they are authorised to provide such consent.
- 10.3** If we become aware that we have collected personal information from a child without verified parental consent, we will delete such information promptly. Please contact us at gerry.smith@gameplansport.co.za if you believe we have inadvertently collected information from a child.

11. DIRECT MARKETING

- 11.1** We may send you marketing communications about our Products, Events, promotions, and news where you have opted in to receive such communications, or where permitted by applicable law (e.g., to existing customers regarding similar products or services).
- 11.2** You may opt out of marketing communications at any time by:
 - Clicking the unsubscribe link in any marketing email;

- Updating your communication preferences in your account settings; or
- Contacting us at gerry.smith@gameplansport.co.za.

11.3 Opting out of marketing communications will not affect transactional communications (e.g., order confirmations, shipping notifications, event confirmations).

12. THIRD-PARTY WEBSITES

12.1 Our Website may contain links to third-party websites. This Privacy Policy applies only to the Company's Website and services. We are not responsible for the privacy practices of third-party websites and encourage you to review their privacy policies before providing any personal information.

13. CHANGES TO THIS PRIVACY POLICY

13.1 We may update this Privacy Policy from time to time. The updated Policy will be posted on the Website with the revised effective date. We will notify you of material changes by email (where we hold your email address) or by a prominent notice on the Website.

13.2 Your continued use of the Website or services after the effective date of any revision constitutes your acceptance of the updated Privacy Policy.

14. HOW TO CONTACT US

14.1 For any questions, concerns, or requests relating to this Privacy Policy or our data processing practices, please contact our Information Officer:

Gerhard (Gerry) Smith (Director)
Gameplan Sport (Pty) Ltd
7 Watsonia Place, Forest Hills, Kloof, Durban, South Africa
Tel: +27 71 762 5029
Email: gerry.smith@gameplansport.co.za
Website: www.gameplansport.co.za

14.2 You may also submit a complaint to the Information Regulator of South Africa:

The Information Regulator (South Africa)
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Email: infoereg@justice.gov.za
Website: www.infoeregulator.org.za

Note: The CIPC company registration number [CIPC REGISTRATION NUMBER] must be inserted before publication.