

INTRODUCTION

References to "**our**", "**us**", "**we**" or "**Tencent**" within this Privacy Notice are to Tencent Mobility Limited and its group companies, as applicable. References to "**Telkom**" within this Privacy Notice are to Telkom SOC Limited.

You have downloaded and subscribed to "*Telkom Music powered by JOOX*" (the "**Service**").

While Telkom has made the Service available to you, the Service is owned and operated by Tencent. When you use the Service you are making use of Tencent's proprietary platform.

This Privacy Notice governs the collection and use of personal information by Tencent and Telkom in connection with your use of the Service.

We are committed to protecting your privacy and ensuring the highest level of security for your personal information.

PURPOSE

This Privacy Notice explains:

- the types of personal information we collect;
- how we use that information;
- who we share it with;
- how we protect that information; and
- your legal rights.

We are committed to abiding by this Privacy Notice, as well as the requirements of applicable laws, in providing the Service to you.

Please read the following carefully as it explains our views and practices regarding your personal information, and how it is handled.

For the purpose of applicable data protection laws, the data controller/responsible party is Tencent Mobility Limited, of Level 29, Three Pacific Place, 1 Queen's Road East, Wanchai, Hong Kong.

HOW WE COLLECT YOUR INFORMATION

Information covered by this Privacy Notice

This Privacy Notice covers all personal information/data collected and used by us.

"**personal data**" or "**personal information**" means information that (either on its own or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include your name, email address, phone number, where you are based or purchasing our products or services from, credit card number, details of the preferences you express to us, and technical information from the devices you use to access the Service.

Information you provide to us

We (and our third-party service providers) may collect personal information (such as your name, email address, telephone number, payment information and preferences) from you when you:

- purchase products or services from us;
- submit any information through the Service application;
- create an account with us, or otherwise sign up for a service;
- opt in to receive marketing from us, including through one of our third party partners;
- communicate with us via third-party social media websites;
- authorise us to access media stored on your device;
- scan a QR code using your camera indicating the type of content you would like to access;
- contact us, correspond with us, or otherwise provide information to us.

In some cases, you may provide personal information to us about another person. In such cases, you confirm that you have the authorisation of such a person to provide us with this information.

When you create a Service Account for the first time with an email address that you have previously provided to us in another circumstance (e.g., when signing up for our emails or for a JOOX account), we may recognise that email address and, once you have completed the online account set-up process, you may be able to see some of your personal information already included in your new online account. This is happening because we have recognised your email address and, for your convenience, have added your information to your online account. You can always change this information by signing into your online account.

In certain cases, it is mandatory for you to provide your personal information (for example your email address when creating an account). In other cases, you can choose whether to provide your personal information, but if you do not provide it (for example access to media stored on your device), you may miss out on a more personalised experience.

HOW WE USE YOUR PERSONAL INFORMATION

We use the personal information we collect from you for the purposes set out below:

PURPOSE	INFORMATION
<p>To set up and manage your online account and provide you with the Service.</p>	<p>We require certain personal information from you. Why? To set up and manage your online account and deliver the Service to you, including making music recommendations, advising you of concerts in your area, or other content you may like.</p> <p>To do this, we need information, e.g., your name, email address, telephone number, payment information, and gender, device info (e.g., computer, smart TV, mobile devices, etc.), and specific technical details (e.g., your mobile carrier, configuration information made available by your web browser or other programs you use to access the Service, your IP address and your device's version and device identification number). We collect your location data (including the location of your device when you use the Service based on sensors in your device or the IP address of the device or internet service you use to access the Service).</p>
<p>To set up and manage your online account for the Service service</p>	<p>If you choose to log in via your Facebook account: information from your Facebook account, including your username, profile picture and gender.</p>
<p>To enhance your enjoyment of the Service</p>	<p>We require access to the list of your contacts if you set up your account via a third party social media account or in your device's contact list if you wish to use the social features of the Service.</p>
<p>To process your purchase order or respond to your queries or requests, including potential screening and background checks and customer care</p>	<p>We require certain personal information (such as name, email address, telephone number, payment information (including credit card details, where applicable), order history, IP address, application usage information) to process your purchase order.</p>
<p>To provide you with information about our products and services (provided you have consented to this)</p>	<p>We use your name and contact details to enable us and our Service Providers (defined below) to send you direct marketing about products and services you may be interested in.</p>
<p>To price and design our products and services</p>	<p>We use your personal information to ensure that new products and services we are developing best suit our users' needs and are priced competitively.</p>
<p>To manage our risks to help identify illegal activity</p>	<p>We use your personal information to identify and investigate illegal or fraudulent activity, including to prevent hacking.</p>
<p>To combine information we receive and collect (e.g. from your browsing behaviour and media stored on or streamed to your device) to understand your interests and preferences and provide you with a more personalised experience</p>	<p>We combine the information we receive and collect about you to better understand your interests and preferences, so that we can provide you with an experience that is tailored to those interests and preferences. For example, we may do this by offering you Tencent products that you are most likely to be interested in, or by sending you personalised offers or promotions by email (where you have agreed to receive our emails). We also use this information so that we may offer, or enable our strategic partners to offer, advertising that is more relevant to you.</p>
<p>To keep internal records and manage our relationship with you</p>	<p>We keep records of your personal information, such as your name, account details and marketing preferences, in order to administer our services and products and keep our records up to date.</p>

To process your personal information where this is necessary to keep the Service application safe and secure	We process your personal information in order to keep our application safe and secure and protect against illegal or fraudulent activity such as cyber attacks.
To keep an up-to-date suppression list where you have asked not to be contacted, in order for us to not inadvertently re-contact you	We keep records of your preferences to ensure that we do not contact you if you have asked us not to contact you with details of our products, services, or promotions.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

The Tencent group operates around the world.

Your personal information is intended for Tencent's use, and may be shared with third parties in certain circumstances (e.g. our third party payment operators or marketers).

The Service may, from time to time, contain links to and from the websites or applications of our partners, or affiliates. If you follow a link to any of these websites or applications, please note that these websites have their own privacy notices and that we have no control over how they may use your personal information. You should check the privacy notices of third party applications and websites before you submit any personal information to them.

We may share your personal information with the following third party organisations:

Tencent's group of companies	We may share your personal information among our group of companies, including our subsidiaries, in order to administer our services and products, including the Service, provide you with customer support, process your payments, understand your preferences and conduct the other activities described in this Privacy Notice, including carrying out our obligations and enforcing our rights under our <i>User Terms</i> .
Our service providers	<p>We use other companies or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of the Service services to you.</p> <p>We may share personal information with the following categories of Service Providers:</p> <ul style="list-style-type: none"> • Infrastructure and IT service providers; • Marketing, advertising and communications agencies, to help personalise and optimise the Service; • Payment processors for the purposes of processing payment and to process and limit fraud in connection with your payment method; • cloud service providers, for the purpose of providing us with platform, cloud storage, video and audio transcoding and streaming services in order to support the Service; • communication service providers who send SMSs on our behalf, translation service providers, service providers to help speed up content delivery to you in your region using acceleration points and content delivery networks, and service providers that provide location and mapping data; and • external auditors. <p>In the course of providing such services, these Service Providers may have access to your personal information. However, we will only provide our Service Providers with the information that is necessary for them to perform the services they provide to us. All Service Providers are prohibited from retaining, using, or disclosing your personal information for any purpose other than to perform the services they provide to us. We will always use our best efforts to ensure that all the Service Providers we work with will keep your personal information secure.</p>
Our strategic partners	Our selected partner organisations may use your personal information. Such sharing of personal information is for the purposes of improving and providing our products and services to you.

<p>Regulators, judicial authorities, law enforcement agencies, and other third parties permitted by law.</p>	<p>In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities pursuant to a valid legal process such as a subpoena, court order or search warrant). These disclosures may be made with or without your consent, and with or without notice to you. We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, law enforcement, address issues relating to security or fraud, to enforce our <i>User Terms</i> (including investigation or any potential violation thereof) or protect the rights, safety or property of our users, you, a third party or those of the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).</p>
<p>Third parties connected with business transfers</p>	<p>We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition or transfer of our business or where we acquire or form a joint venture with any other business, in which case we may disclose your data to any prospective buyer, new owner, or other third party involved in such change to our business, or where will sell or transfer any of our assets, in which case the information we hold about you may be sold as part of those assets and may be transferred to any prospective buyer, new owner, or other third party involved in such sale or transfer provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.</p>

WHERE DO WE STORE YOUR PERSONAL INFORMATION?

The personal information that we collect from you may be transferred to, and stored at, a destination outside the jurisdiction in which you are primarily located, namely in the Hong Kong Special Administrative Region of the People's Republic of China. It may also be accessed and processed by staff operating outside your jurisdiction and who work for us or for one of our Service Providers.

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws by the party outside your jurisdiction receiving the personal information, so that your personal information is provided with an adequate level of protection.

YOUR CHOICES / YOUR PRIVACY RIGHTS

You have various rights in connection with our processing of your personal information as may be granted under the local law applicable in the jurisdiction where you reside.

If you wish to exercise one or more of these rights as may be granted under your local law, please contact our Data Protection Officer with your request at joox_dpo@tencent.com cc privacy@tencent.co.za, and include your name, email and postal address, as well as your specific request and any other information we may need in order to provide or otherwise process your request.

Your rights:

<p>Access</p>	<p>You have the right to request a copy of the personal information we are processing about you, which we will provide back to you in electronic form. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information.</p>
<p>Rectification</p>	<p>You have the right to have incomplete or inaccurate personal information that we process about you, rectified.</p>
<p>Deletion</p>	<p>You have the right to request that we delete personal information that we process about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.</p>
<p>Restriction</p>	<p>You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it. In such a case, we would mark stored personal information with the aim of limiting particular processing for particular purposes in accordance with your request, or otherwise restrict its processing.</p>

Portability	You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent (such as for direct marketing communications) or to perform a contract with you (such as to manage your online account).
Objection	Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim. Under applicable law in South Africa, in certain circumstances, you also have the right to object to the processing of personal information in the prescribed manner, on reasonable grounds relating to your particular situation, unless legislation provides for such processing, or to object for the purposes of direct marketing.
Withdrawing Consent	If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. If you would like to withdraw consent, including if you would like to opt out of receiving marketing correspondence from us, please contact us at joox_dpo@tencent.com cc privacy@tencent.co.za .
Withdrawing consent to direct marketing	If you have consented to our processing of your personal information for marketing and you would like to opt out of receiving marketing correspondence from us, please contact us at feedback@joox.com cc legal@tencent.co.za or follow the unsubscribe instructions located in the email (as relevant). Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your online account, relationship, activities, transactions and communications with us. Additionally, if you do request that we stop sharing your personal information with third parties for their direct marketing purposes, it is also prudent you opt out from or contact that third party directly.
Make Complaint	a You have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. Under applicable law in South Africa, you also have the right to lodge a complaint with the Information Regulator. The address of the Information Regulator is 33 Hoofd Street Forum III, 3rd Floor Braampark, Braamfontein, Johannesburg. The relevant email address is: infoereg@justice.gov.za . Your local representative can be contacted via email at privacy@tencent.co.za or at 141 Bram Fischer Drive, Randburg, Johannesburg, South Africa.

HOW LONG DO WE KEEP PERSONAL INFORMATION?

Only for as long as it is necessary for the purpose for which the information was collected and to the extent permitted by applicable laws.

When we no longer need to use your information, we will remove it from our systems and records and take steps to promptly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

You can request that we delete some or all of your information but we can only do so if: (a) we have no legal or regulatory obligation to retain it; or (b) we do not require it to provide a service that you would still like us to provide to you.

SECURITY

We have implemented technical and organisational security measures in an effort to safeguard personal information in our custody and control. Such measures we have implemented include, limiting access to personal information only to employees and authorised Service Providers who need to know such information for the purposes described in this Privacy Notice, as well as other technical, administrative and physical safeguards.

While we will endeavour to always protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

To provide you with increased security, certain personal information stored in your online account is only accessible via your username and password. You are responsible for maintaining the confidentiality of your online account credentials, and we strongly recommend that you do not disclose your online account username or password to anyone. We will never ask you for your password in any unsolicited communication. Please notify us immediately (see **Contact Us** section below) of any unauthorised use of your online account credentials or any other suspected breach of security.

CHILDREN

Children must not use the Service for any purpose, except where their parent or guardian has provided consent (to the extent this option is available in your jurisdiction).

By children, we mean users **under the age of 18 years old**, or in the case of a country where the minimum age for processing personal information differs, such a different age.

If you believe that we have personal information of a child under these ages without parental/guardian consent, or if you are the parent or guardian of the user and wish to withdraw your consent, please contact us at joox_dpo@tencent.com cc privacy@tencent.co.za (for South Africa) and we will delete such information.

CHANGES TO THIS POLICY

We reserve the right to change our Privacy Notice from time to time. If we change our Privacy Notice we will notify you of these changes via the Service app and post the new Privacy Notice here.

CONTACT US

If you have any questions about this Privacy Notice, please contact us at joox_dpo@tencent.com cc privacy@tencent.co.za (for South Africa).