

Privacy Policy GEM Payment Services - Privacy Policy, effective 2012

The application you have entered is operated by or on behalf of the GEM Project NPC ("GEM") by Going the Extra Mile Payment Services, registration number 2014 / 174233 / 08, situated at River Rd, Rivonia, Gauteng (Tel: +27 (82) 557 9750, as part of GEM Project, NPC. GEM is committed to protecting your personal privacy. This Privacy Policy outlines the types of information that are collected by GEM on its websites, mobile browsers and applications and how we use and protect it. This Policy also explains the choices that you can make about the way your information is collected and used. This Policy applies only to GEM websites, applications and social network sites (the "Sites"), and it does not apply to banners, sweepstakes and other advertisements or promotions that we may sponsor or participate in on web sites owned by third parties.

Our Privacy Policy includes the following topics. For specific information regarding any particular topic, please click on the link below:

Your Consent to this Privacy Policy
The Information We Collect
The Way We Use Personal Information
Collection and Use of Other Information;
Use of Cookies With Whom We May Share Information
Manage Your Personal Information;
Unsubscribe Data Protection and Security
Important Note about Children's Information
Changes to Our Privacy Policy
Links to Other Web Sites
How to Contact Us
Applicable Web Sites
Important Note Regarding U.S. Law

Your Consent to This Privacy Policy

By using our web and social network sites, you signify that you agree with the terms of our current Privacy Policy as posted on our sites as well as the terms of our Terms and Conditions. You further signify that you agree to the use of your Personal Information according to these terms and conditions. If you do not agree with any term in this Policy or our Terms and Conditions, please do not use this site or provide any Personal Information to us.

The Information We Collect

As used in this Privacy Policy, "Personal Information" means any information that is linked to your identity such as your name, ID number, street address, telephone number, mobile number, screen name, age and/or email address. The site you entered may collect some or all of these types of Personal Information through a competition, contest, game, survey, questionnaire or promotion, or a registration form. Some of our sites may require registration and disclosure of particular information such as ID number in order for you to participate in events, competitions, games or other activities. In order to register on our sites, we require you to disclose your name, email address, mobile number and in some cases your ID number. GEM will not collect any Personal Information from your visits to our sites unless you provide your Personal Information to us voluntarily, and we will not require you to provide more information

than is necessary to participate in our sites' activities. We also do not collect financial or other sensitive data information about our users.

When you provide us with Personal Information, you are authorizing us to use that information in accordance with the terms of this Privacy Policy, which includes your right to limit our use of your Personal Information as described in this Policy.

The site you entered may also collect Personal Information from you about a third party (e.g., the site might allow you to send an email or message to a friend, in which case we will need that person's name and email address). Please note that we use such information only for the specified purpose (e.g., to deliver the email message) and we will not contact the third party again by email unless and until the third party contacts us or provides permission to do so.

The Way We Use Personal Information

When you supply Personal Information at a GEM site, we will consolidate such Personal Information and use it for the purpose for which it was collected (e.g., to enter you in a competition, participate at an event or to fulfill the delivery of a competition prize or product order) in accordance with the terms of this Privacy Policy. We may also use it to contact you regarding GEMs promotions as well as other products and services, which may be requested by or otherwise of interest to you (including those we may offer jointly with other companies). At any time, however, you may opt out of such future contact by unsubscribing from our database by following the unsubscribe instructions included in each promotional email or by changing your preferences in your account (See "Manage Your Personal Information: Unsubscribe" below). We also use Personal Information to keep track of a user's activities on our sites, to improve our marketing and promotional efforts, to statistically analyze site usage, to improve our site features, design and content and to refine our marketing strategies.

We may also enhance your Personal Information by linking it to data obtained from third parties, such as non-personally identifiable information (e.g., demographic and geographic characteristics) as well as other publicly available data such as census information. Such enhanced information allows us to provide our users with a more customized experience.

GEM's primary goal in collecting and using Personal Information is to give you a meaningful and customized experience while you are using our sites as well as to promote our products in a cost effective and efficient manner.

Collection and Use of Other Information; Use of Cookies

You may have heard of "cookies," which are small files or pieces of information that are stored by your browser on your computer's hard drive when you visit a site. The use of cookies is an industry standard and you will find them at most sites. GEM may use

cookies to collect other information during your visit to our sites, such as the particular site areas you visit and the activities in which you participate at our sites. GEM does not automatically collect any Personal Information, but we may combine non-personal information collected automatically (through cookies) with voluntarily submitted Personal Information. Such link may occur only if you provide GEM with Personal Information on our sites. This practice allows GEM to keep track of items such as competition participation, event information, email and advertising interaction levels, survey responses, online coupon redemption and other site activity in order to better tailor our sites and our products to your interests and needs. Cookies may also be used to help speed up your future activities at our sites -- the computer can remember that you have already provided Personal Information to us and not request that you provide any a second time.

Anonymous information about your computer, such as your IP address (a number assigned to your computer whenever you surf the Internet), the type of Internet browser you are using, and the type of computer operating system you are using may also be collected by us using cookies. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address. When you request a page from this site, our servers log your IP address.

Most browsers are initially set to accept cookies. If you'd prefer, you can set yours to refuse cookies or to alert you when cookies are being sent. Refusal of cookies at the site you entered may result in an inability to visit certain areas of the sites or to receive personalized information when you visit the sites.

With Whom We May Share Information

In the course of doing business, we employ other companies to perform a variety of functions on our behalf. For example, at times we may retain third parties to analyze, update and correct data we collect on our sites, including Personal Information, to help us improve our products, our database and our sites. In addition, we may share Personal Information including email address with agents, suppliers, fulfillment houses and other service providers to allow delivery of prizes, information, products or services. These suppliers and other third parties may have access to your Personal Information if it is needed to perform their functions for Pepsi, but they are not authorized by us to use your Personal Information in any way other than the intended use including their own marketing purposes. We do not share your Personal Information including email address with any third parties who are not our agents or service providers.

We also may share aggregate, non-personally identifiable information about our users with advertisers, business partners, sponsors, and other third parties. For example, we may tell a business partner the number of men and the number of women that entered a contest or participated at an event, but we do not disclose Personal Information about such contestants in violation of this Privacy Policy.

Except as stated in this Privacy Policy, we do not sell, transfer or disclose your Personal Information without your prior consent. Our intention is to limit or prohibit the sharing of Personal Information provided to us in ways that are different than the ways described above without also providing you with an opportunity to "unsubscribe" or prohibit such unrelated uses.

We may also release your Personal Information including email address if required to do so by law, or by search warrant, subpoena or court order, or to a third party to which ownership of Pepsi is transferred via an acquisition, merger, sale of assets or otherwise.

GEM Payment Services currently contracts with online partners to help manage our Internet business. We use the services of a third party to help us understand how visitors use our site. To do this, we use Action Tags and cookies provided by such third party on this site. The information we collect helps us determine both group interests and unique individual interests. This information allows us to provide optimal content both on our sites and within our communications to consumers. We use these Action Tags in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these promotional emails, please follow the unsubscribe instructions in each email or change your email preferences on the site in your account. Although such third party collects this information on our behalf, we control how that data may and may not be used.

Manage Your Personal Information; Unsubscribe

You are ultimately in control of the Personal Information that we collect and use. We want to keep your data complete, up to date and accurate. Pepsi provides its users with the following options to manage their Personal Information including email address that is in reasonably retrievable form in our database:

- Send us an e-mail by clicking on the following link and inform us how you want to update your information on our platform- info@gemproject.org - Be sure to include your name, username and clear instructions regarding any change to your Personal Information including email address or if you would like us to unsubscribe you from our database.
- In the event that a user unsubscribes from our database, we will retain a record of the Personal Information including email address and the unsubscribe action for our internal records as evidence of the action and our compliance with this Privacy Policy.

Data Protection and Security

We take commercially reasonable precautions to keep your Personal Information including email address secure. All access to the information we collect is subject to physical, electronic and managerial restrictions to prevent unauthorized access,

modification or misuse.

Important Note about Children's Information

Please note that we do not collect any Personal Information from any person under the age of sixteen (16) years of age. In addition, we reserve the right to limit participation in particular programs or promotions to visitors sixteen (16) years of age, or older

Changes to Our Privacy Policy

GEM reserves the right to change or remove this Privacy Policy at our discretion. We will post any changes to this Policy including email practices or any new policy here and we encourage you to visit this area frequently to stay informed. If there is any material change in the type of information we collect or way in which we use such information including email address, then we will obtain your permission before we make any such change.

Links to Other Web Sites

Users should be aware that when you are on this - site you could be directed to other sites that are beyond our control. There may be links to other sites that include links from advertisers, sponsors, and partners that may use the GEM family of brand or logos. These other sites may send their own cookies to users, or otherwise collect data or solicit Personal Information. Always be aware of where you are surfing on the Web. Check the linked site to locate and review its privacy policy, which may be different from this Privacy Policy. GEM does not endorse and makes no guarantee or representation as to the sufficiency, accuracy or completeness of the content or privacy policy of any third-party web site to which you may be linked from this site.

How to Contact Us

Should you have any questions or concerns about this Privacy Policy or the collection of information, please call us at +27825579750. For our address email:

info@gemproject.org

Applicable Web Sites

This Privacy Policy applies to the web, application and social network sites operated and managed by the GEM Payment Services NPC, including but not limited to:

www.gemproject.org; mobi.gemproject.org; GEM USSD platform (* 120 * GEM1 #); GEM smartphone applications on Android, iOS and Blackberry; and others that may be added in the future.

Important Note Regarding South African Law

Please note: The laws and regulations in different countries impose different (and even conflicting) requirements on the Internet and data protection. We are located in the Republic of South Africa, as are the servers that make this site available worldwide. All matters relating to this site are governed by the laws of the Republic of South Africa including the Protection of Private Information Act. If you are located in the European Economic Area and/or the Republic of South Africa when you contact us, please note that any information you provide can be transferred to the USA and by submitting the information you authorize this transfer.