

## **PRIVACY POLICY**

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### **1. OPERATOR OF WWW.COSMOPOLITAN.CO.ZA**

- 1.1. This website is operated by Associated Media (Pty) Ltd, 9<sup>th</sup> Floor, 80 Strand Street, Cape Town, 8001 (“**Associated Media**”) by permission of Hearst Communications Inc, New York, New York, United States of America and is located at the domain name [www.cosmopolitan.co.za](http://www.cosmopolitan.co.za) (“**the Website**”).
- 1.2. When you use, interact with, access or otherwise make use of the Website, any mobile apps or any other digital service (“**the Digital Services**”) owned or operated by Associated Media (by permission of Hearst Communications as set out herein above), or when you complete a hard-copy subscription, competition or event form and submit same to us (“**Subscription Forms**”), we and certain other third parties obtain certain information about you.
- 1.3. The purpose of this Privacy Policy is to provide you with an overview of our privacy practices relating to the Digital Services and Subscription Forms, and what is done with your private information.

### **2. WHAT INFORMATION IS COLLECTED**

- 2.1. Information you provide when you use the Digital Services (including any contact, payment or demographic information).
- 2.2. Information you provide when you order related content, products or services (including any contact, payment or demographic information).
- 2.3. Information you submit when signing up for newsletters, create an account on the Website (or other Digital Services) or otherwise register for any other form of membership through the Subscription Forms (including any contact, payment or demographic information).
- 2.4. Information you include in entry forms for competitions, promotions, sweepstakes, events or similar initiatives.
- 2.5. Information you provide about other people (for example the personal information you provide when ordering a gift subscription).
- 2.6. Information collected by Cookies and Similar Technologies (including information about your device and browser, IP address or mobile device advertising identifiers, and how you and others use, interact with or respond to the Digital Services). Please have regard to our Cookies Policy for further information.

- 2.7. Certain location information associated with your device when Location Services are active.
- 2.8. Information we obtain from outside sources, such as business partners, data suppliers and social media platforms.

### **3. HOW THE INFORMATION WE COLLECT IS STORED**

- 3.1. Your information collected from the Digital Services is stored on the Website's servers. Certain information submitted to us via email may be stored on our email service provider's servers. Our email service provider's privacy policy may be located [here](#).
- 3.2. Your information collected from the Digital Services and the Subscription Forms may further be stored and processed within the Republic of South Africa, the United States of America, or any other country in which the entities referred to in paragraph 1.1 above, their subsidiaries, affiliates or service providers maintain facilities. We may transfer information that we collect about you, including personal information, to affiliated entities, or to third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or the European Economic Area, please note that we will not transfer information, including personal data, to a country outside of the European Union or the European Economic Area.

### **4. HOW THE INFORMATION WE COLLECT IS USED**

- 4.1. **To provide you with the Digital Services or services in terms of the Subscription Forms, including:**
  - 4.1.1. Processing your requests regarding the Digital Services and/or Subscription Forms (i.e. the processing of any subscriptions, products, or services requested in relation to the Digital Services, or to process the Subscription Forms to record your participation in a survey, sweepstakes, competition, promotion, event, or similar initiative;
  - 4.1.2. The provision of customer assistance and technical support services;
  - 4.1.3. The customisation of content for the purposes of improving your experience in using the Digital Services, including the retention of your user preferences and the presentation of the Digital Service content in the most appropriate and effective manner for your specific browser and/or device;

- 4.1.4. The maintenance, operation, improvement and development of the Digital Services and the content presented therein, including the development of new products and features based on users' interaction with the Digital Services;
- 4.1.5. Analysis of how you and others interact with and respond to the Digital Services, including the measurement and optimisation of usage, reliability, performance, trend analysis, market research and for accounting, auditing, financial, legal or other purposes).

**4.2. To communicate directly with you:**

- 4.2.1. Sending you informative messages about the Digital Services (for example, to confirm your subscription or notify you of any changes) and competitions, surveys, sweepstakes, promotions or events.
- 4.2.2. Delivering marketing or promotional communications, including offers or promotions about our (or a third party's) products, services or other initiatives.

**4.3. For advertising/marketing purposes (inclusive of interest-based advertising):**

- 4.3.1. Interest-based advertising (commonly referred to as targeted or personalised advertising) is advertising that draws inferences from your activities over time on the Digital Services and other online services provided/operated by third parties, as well as information from other sources. Such advertising may consist of text advertisements, images, animations, or videos and may be displayed to you based on various factors, including (but not limited to) the context of the site or app in which they appear, information you provided to the operator of the site or app (for example, when you created an account), your activities on the site or app (for example, pages viewed, searches performed or ads clicked), and information such as your demographic, interests and household information. These automated ads may vary dependent on your usage of the Digital Services and make use of technologies such as cookies, web beacons, tags, scripts, pixels, local shared objects (including HTML5 cookies) and software development kits (SDKs).
- 4.3.2. We, our service providers and third parties use automated means including Cookies and Similar Technologies on the Digital Services and on third-party sites, apps or other media to, firstly, collect information for interest-based advertising, or, secondly, to serve you interest-based advertisements. When

you agree to the use of Cookies and Similar Technologies on the Digital Services, unique identifiers may be associated with your browser or device to support interest-based advertising. We use online and offline information we obtain about you, including your personal information, for interest-based advertising purposes. We aggregate the information we obtain to create audiences that are most likely to respond to ads based on demographic, interests or household information.

- 4.3.3. There are steps you can take to limit the collection of your information by Cookies and Similar Technologies and the use of your information for interest-based advertising purposes. These steps vary for the web and mobile app environments and are browser- and device-specific. To learn more about how to limit the collection of your information, please see the relevant section of our Cookies Policy.

## **5. HOW THE INFORMATION WE COLLECT IS SHARED**

### **5.1. Advertisers, Advertising- and Market-Related Service Providers and Partners**

We may provide your information to advertisers, advertising agencies, advertising networks, advertisement exchanges, marketing businesses, technology vendors and other entities that create, deliver and assess advertising or marketing campaigns, including interest-based advertisements.

### **5.2. Social Media Platforms**

If you interact with social media, share content using social media share buttons, or access features of the Digital Services that contain content or features provided by social media platforms, the relevant social media platform may collect information. We encourage you to review the privacy policies of the social media platforms that you engage with as we are not responsible for their privacy practices.

### **5.3. Business Partners**

We may provide your information to business partners including, without limitation, joint marketing partners and content sponsors, for various purposes. For example, we may partner with a third party to offer products on a co-branded, co-sponsored or cross-promotional basis that involves the sharing of information. These initiatives may be offered on the Digital Services or on other media.

### **5.4. Other Parties When Required by Law or as Necessary to Protect Our Rights**

We may share your information as we believe is necessary or appropriate to protect, enforce, or defend our legal rights, the privacy or safety of our employees, users of

the Digital Services or other individuals and entities, or to comply with or enforce applicable industry standards, law or legal process, including responding to court orders, warrants, subpoenas and other lawful requests from public and government authorities.

**5.5. Corporate Transactions**

We reserve the right to transfer any of the information we have about you to proceed with the consideration, negotiation or completion of a sale or transfer of all or a portion of our business or assets to a third party, such as in the event of a merger, acquisition or other disposition, or in connection with a reorganisation, dissolution or liquidation.

**5.6. With Your Express Consent or Otherwise at Your Direction**

In addition, we may share your information with third parties when you consent to or request such sharing.

**6. YOUR CHOICES WITH REGARD TO YOUR INFORMATION**

**6.1. Access, Correction and Deletion**

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Digital Services. If you wish to access or amend any other personal data we hold about you, or to request that we delete or transfer any information about you that we have obtained from a service provider or third party, you may contact us at the following details:

[privacy@assocmedia.co.za](mailto:privacy@assocmedia.co.za)

**6.2. Direct Marketing Opt-Outs**

Email Marketing

You may opt out of receiving marketing or promotional emails from us by clicking on the “unsubscribe” link contained in such emails. Depending on the Digital Service you use, you also may be able to opt out of marketing or promotional emails by logging into your account and managing your email preferences. Please keep in mind that if you opt out of receiving marketing or promotional emails, we may still send you transactional emails or other communications relating to your use of the Digital Services (for example, to confirm your subscription, to inform you of changes to a Digital Service or in response to your password recovery request).

Text Message Marketing

If you choose to participate in a text message marketing campaign or promotion offered in connection with a Digital Service, you may opt out of receiving marketing texts from us by following the instructions contained in those messages (for example, texting the word STOP) or provided to you when you elected to receive text message marketing.

6.3. **Interest-based Ads Opt-Outs**

6.4. We describe below steps you can take to limit tracking of your activities and the delivery of interest-based ads in browsers and mobile apps you use to access the Digital Services. Please keep in mind that if you opt out of interest-based ads, you will still see ads, but these ads will not be based on your inferred interests. In addition, if you take the steps described below, some automated means may still be used to collect information about your interactions with the Digital Services for the other purposes described in this Privacy Notice (e.g., to remember user preferences or enable specific functionality). The technologies used to deliver ads on websites and mobile apps differ. Please also remember that opt-outs are browser- and device-specific.

Website (Browser) Opt-Outs

i. Disabling Cookies

Most browsers accept cookies by default. You may be able to change the settings to have your browser refuse certain cookies or notify you before accepting cookies. If you choose to disable the use of cookies in your web browser, some features of the Digital Services may become difficult to use or unavailable.

ii. Opt-Out Cookies

You can follow the instructions provided by the Digital Advertising Alliance (“DAA”) [here](#) and/or the Network Advertising Initiative (“NAI”) [here](#) to place an opt-out cookie on your browser. These opt-out cookies enable you to block participating companies from installing future cookies on your computer or browser. If you place opt-out cookies but subsequently clear or delete cookies on your computer or device browser, your opt-out cookies may be deleted and you may have to renew your opt-out choices for that specific browser. The opt-out mechanisms offered by the DAA and NAI are provided by third parties. The entities referred to in paragraph 1.1 above do not control or operate these mechanisms or the choices provided through these mechanisms.

## **7. DATA RETENTION**

7.1. We only retain the personal data collected from a user of the Digital Services (or the Subscription Forms) for as long as the user's account is active or otherwise for a limited period of time as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements as follows:

7.1.1. The contents of closed accounts are deleted within 3 months of the date of closure;

7.1.2. Backups are kept for 3 months;

7.1.3. Billing information is retained for a period of 5 years as of their provision to the entities referred to in paragraph 1.1 above in accordance with applicable accounting laws and best practice;

7.1.4. Information on legal transactions between the user and the entities referred to in paragraph 1.1 above is retained for a period of three years in accordance with the prescription periods for civil claims set forth in the South African Prescription Act, 68 of 1969 (as amended).

## **8. CHANGES TO THIS PRIVACY POLICY**

8.1. We update this Privacy Policy from time to time to reflect changes in our privacy practices or applicable laws. Where changes to this Privacy Policy have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you advanced notice so that you have the opportunity to exercise your rights (e.g. to object to the processing). We will publish the updated version on the relevant Digital Services and indicate at the top of the Privacy Policy when it was most recently updated. Your use of the Digital Services will be governed by the then-current version of the Privacy Policy.

## **9. CONTACT US**

9.1. Our contact information may be found [here](#).