



24SUM MORE PRIVACY STATEMENT

Peregrine Capital (Pty) Ltd ("Peregrine", "we", "us" or "our") organises and promotes the 24SUM MORE Maths Competition ("the Competition") as an educational initiative aimed at encouraging numeracy, confidence and problem-solving skills among primary school learners.

The privacy and trust of all Competition participants, including learners, parents or legal guardians, teachers and schools ("participants"), are extremely important to us. We are committed to collecting and processing personal information in a lawful, fair and transparent manner in accordance with the Protection of Personal Information Act, 2013 ("POPIA"). It is important that you read this Statement carefully before submitting any information to Peregrine:

- By submitting any information to Peregrine, you provide consent to the processing of your personal information as set out in this Statement.
- The provisions of this Statement are subject to mandatory, unalterable provisions of applicable laws;
- If you do not agree to any of the provisions of this Statement, you should not submit personal information, and you may not be able to participate in the Competition.

We respect your privacy and commit to the following:

- To implement reasonable computer (logical), physical and procedural (process) safeguards to protect the security and confidentiality of the information we collect.
- To limit the information collected to the minimum required to provide a better service and/or product or meet our other goals.
- To permit only properly trained, authorised employees to access information.
- Not to disclose your information to external parties, unless we are required or permitted by law to do so or with appropriate consent.

Purpose

The Competition is designed to make mathematics engaging, confidence-building and fun for learners in Grades 4 – 6. This Privacy Statement explains:

- What personal information we collect
- Why we collect it
- How it is used and protected
- Who it is shared with
- What rights participants, parents and/or guardians have
- How to contact us or the Information Regulator



Scope

In this Statement, “**Peregrine**” refers to one or more of the companies in the Peregrine Capital Holdings (Pty) Ltd group of companies that operate in South Africa, together with its “**Business Partners**”, being external service providers appointed to assist with the administration, facilitation, photography, videography, and marketing of the Competition.

Legislation and Regulations

This Statement is subject to the laws of the Republic of South Africa, including:

- POPIA
- Consumer Protection Act, 2008 (“CPA”)
- Promotion of Access to Information act, 2000 (“PAIA”)

Our PAIA manual is available at: website:

https://peregrinewebstorage.blob.core.windows.net/peregrinewebuploads/assets/PAIA_Manual_2025_e8701ee04e.pdf

Roles and Responsibilities

Based on POPIA, the following role players are relevant to this Statement:

Role	Responsibilities
Information Regulator	The Information Regulator of South Africa oversees compliance with POPIA.
Data subject	Learners, parents or legal guardians, teachers and authorised school representatives whose information is processed for the Competition.
Responsible Party	Peregrine is the Responsible Party and remains legally accountable for the protection of personal information processed for the Competition.
Operator or Processing Party	External service providers appointed to assist with Competition administration, facilitation or marketing act as Operators under written agreements and process information only on Peregrine Capital’s instructions.

Children and Personal Information

The Competition involves children under the age of 18. Peregrine treats children’s personal information with heightened care and protection.

- Personal information of learners is collected only with the consent of a parent or legal guardian
- Access to children’s information is strictly limited
- Information is retained only for as long as necessary to administer the Competition and meet legal obligations



If we become aware that personal information of a child has been provided without appropriate consent, we will delete the information and withdraw the learner from the Competition.

To administer the Competition, we may collect:

- learner, parent or guardian name and contact details
- identity or passport number (where required for verification or prize delivery)
- school and teacher details
- photographs or recordings only where consent has been provided

Examples of information collected from you or other sources and processed by Peregrine are detailed below (which is not an exhaustive list) and linked to the purpose thereof.

Source	Purpose	Data Subject Information
Email / SMS / WhatsApp (or other cross-platform messaging service)	Facilitate required communication	<ul style="list-style-type: none"> ▪ First Name and Surname ▪ Email address ▪ Contact Numbers (Telephone and Mobile)
Peregrine Customer Care Complaints or Compliments	Assist Peregrine to categorise the Data Subject's complaint or compliment Provide feedback to the Data Subject regarding the complaint or compliment	<ul style="list-style-type: none"> ▪ First Name and Surname ▪ Email address ▪ Contact Numbers (Telephone and Mobile)
Competitions Peregrine and/or business partners	Validate the Data Subject's entry and whether he/she is eligible to partake in the competition Contact the Data Subject if he/she is the prize winner	<ul style="list-style-type: none"> ▪ First Name and Surname ▪ Email address ▪ Contact Numbers (Telephone and Mobile)
CCTV Surveillance	Stores and Office buildings under 24x7 CCTV camera surveillance for public safety, crime prevention and quality control	Data Subjects' physical features such as face, gender, race, height, clothing worn at the time and actions at the time.
Social Media	Social media content, advertisements, or promotional materials issued by Peregrine relating to the Competition, including showcasing Competition activities, announcing winners, and promoting future competitions or related initiatives.	Content of Data Subjects.



Source	Purpose	Data Subject Information
Peregrine24SUM MORE Competition	Process student, teacher, parent and school registration to receive education content and promotional communications in terms of the program Process competition entry forms submitted by data subjects (including minors with the consent of their parent/legal guardian) Obtain consent for photo release, social media publication and/or delivery of prizes for competition winners (depending on the specific competition T&Cs) Sharing winners' details with competition sponsors (3rd-party) to enable delivery of prize	<ul style="list-style-type: none">First Name and SurnameID numberContact NumberEmailPhysical AddressPhoto/video/voice recordingChild nick name (if required)Child ageChild's schoolSchool juristic information (such as name, address, email, EMIS number and type)School principal and teacher representative's full name and emailAuthorised person's (to register school) full name, email and contact number

We do not collect information for unrelated marketing or investment purposes.

Use of Information

Personal information is used to:

- register participants
- administer Competition rounds
- advertise the Competition
- communicate with parents, schools and winners
- arrange logistics, including travel where applicable
- award and deliver prizes
- meet legal and regulatory requirements
- disclosing your personal information to third parties like travel service providers and our Business Partners (in which case we will have agreements in place to secure the confidentiality of Your Personal Information) for reasons set out in this Statement or where it is not unlawful to do so

Consent for participation is separate from consent for photography, media use or promotional publication. Declining media consent does not affect participation.



Further Processing with Competition Partners

Peregrine works with certain Competition Partners to support the administration, facilitation, and promotion of the Competition. In this context, personal information may be further processed by such Competition Partners on behalf of Peregrine for purposes related to the Competition.

Such further processing may include, without limitation, the collection of competition entry or registration forms, the performance of administrative and logistical functions (including travel arrangements where applicable), the taking of photographs or recordings during Competition activities, and the submission or transfer of such information to Peregrine or Competition-related purposes. The Competition Partners process personal information as Operators under POPIA and are contractually required to protect information and use it only for Competition Purposes.

Closed-Circuit Television (CCTV)

Closed-Circuit Television (CCTV) images are processed, monitored and recorded for the purposes of crime prevention and detection as well as public safety in our business premises. For further information, please contact us.

Retention and Destruction of Information

Peregrine will retain information for the duration of the Competition, and for reasonable period thereafter to address queries, disputes or legal obligations. Children's information is not retained indefinitely. Once no longer required, information is securely deleted or destroyed.

Information Security

Peregrine aligns with the principles of confidentiality, integrity, availability and privacy. While no system is completely secure, we take all reasonable steps to protect personal information against loss, misuse or unauthorised access.

Disclosure

We only share personal information where it is necessary to run the Competition or where we are legally permitted or required to do so. This may include sharing information with trusted service providers who help administer the Competition, where consent has been given, or where disclosure is necessary to protect safety, comply with the law or enforce our rights. Any third parties we work with are required to protect personal information appropriately.

Your Right to Access Information

You have the right to ask whether we hold personal information about you, to access it, to correct it if it is incorrect, and to request deletion where this is legally permitted. You may also withdraw any optional consents you have given, such as consent for publicity or media use.



Requests can be made using the contact details below. Please note that if you ask us to delete information that is required to administer the Competition, this may mean that participation in the Competition can no longer continue.

Data Breach Notification

If there is a data breach that affects personal information, Peregrine will notify the affected individuals and the Information Regulator as required by POPIA and will take reasonable steps to address the issue.

Amendments to this Statement

We may amend this Statement from time to time for any of the following reasons:

- to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
- to comply with changes to any legal or regulatory requirement.
- to ensure that this Statement is clearer and more favourable to you;
- to rectify any mistake that may be discovered from time to time; and/or
- for any other reason which Peregrine, in its sole discretion, may deem reasonable or necessary.

Depending on the nature of the amendments, amendments to this Statement will either be notified to you by publication on our website or by direct notification. Any such amendment will come into effect and become part of any agreement you may have with Peregrine when notice is given to you of the change by publication on our website, or when you receive direct notification of the change. It is your responsibility to check the website often.

Contact Us

If you have any questions about this Privacy Statement or how your information is handled, or if you would like to exercise your rights, please contact us:

Email: pc.compliance@peregrine.co.za

Telephone: 011 722 7499

Peregrine Capital (Pty) Ltd