

Privacy and Cookie Policy

Privacy Policy of www.rookieusa.co.za

This Application collects some Personal Data from its Users.

1. Introduction

This privacy policy (the Privacy Policy) applies to all persons using the website, mobile applications or digital services located at www.rookieusa.co.za (collectively the **Website**). This Website is owned and operated by Skye Distribution (Pty) Ltd, a company registered in South Africa, with its registered address at:

Skye Distribution (Pty) Ltd
Reg. no. 1955/002635/07
Cnr Prelude and Renaissance Avenue
Crown Mines, Ext 16
2025
South Africa

Owner contact email: info@rookieusa.co.za

(The company will be referred to as "us", "we", "the Owner" in this privacy policy).

By accessing the Website, the person that accesses the Website (the User) accepts and agrees to this Privacy Policy and expressly consents to the use and disclosure of their personal information in accordance with the provisions of this Privacy Policy. If the User does not agree to the provisions of this Privacy Policy, the User may not access or use this Website.

The Owner reserves the right to amend this Privacy Policy or add provisions to it at any time. By continuing to access and/or use this Website, the User agrees to the amended versions of the Website.

2. Types of data collected

If the User registers with the Website, the Owner will collect and use the User's Personal Data. This information may include, without limitation: Cookies; Usage Data; last name; gender; date of birth; address; email address; password; country; city; billing address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application, or by the owners of third-party services used by this Application, serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

3. Mode and place of processing the Data

3.1. Methods of processing

The Owner takes appropriate and reasonable security measures to secure the integrity and confidentiality of the Users' Personal Data in its possession and under its control to prevent the unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Owner uses systems that are sufficiently secure with reference to accepted technological standards at the time of transactions.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

The Owner may release the User's Personal Data or disclose it to external parties in certain circumstances, including, but not limited to the following:

- if the Owner is required or allowed to do so by law or a court order;
- in order for the Owner to enforce its rights; and
- in order for the Owner to provide Services to the User.

3.2. Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party; or
- if processing is allowed for or not prohibited by applicable law.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

3.3. Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Personal Data collected by the Owner may be transferred to persons in other countries. The User consents to such transfer. The Owner will take reasonable steps to ensure that such persons have appropriate privacy measures in place. If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

3.4. Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

3.5. The purposes of processing

The purposes for which the Owner uses the Data includes, but is not limited to:

- interaction with external social networks and platforms;
- analytics, registration and authentication;
- providing goods and services to the User;
- facilitating the User's transactions on the Website;
- improving the products and services offered by the Owner as well as the User's experience when using the Website;
- marketing, promote and advertise products and services to the User;
- communicating with the User for the Owner's internal purposes; and
- research conducted by the Owner. Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

4. Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

4.1. Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#)

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

Personal Data collected: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User’s privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

AddThis (Oracle Corporation)

AddThis is a service provided by Oracle Corporation, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Direct registration (this Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data collected: address; billing address; city; country; date of birth; email address; gender; last name; password.

4.2. Cookies

The Website makes use of Cookies. Cookies store information regarding Users and have various purposes, such as improving the User's experience on the Website and to facilitate the User's use of the Website. Users may disable or decline cookies. However, if the User does so, the User might not be able to use the Website properly and certain aspects of the Website might not function.

5. The rights of Use

5.1. Users may exercise certain rights regarding their Data processed by the Owner. In particular, subject to applicable law, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.

- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

5.2. Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

5.3. How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

6. Additional information about Data collection and processing

6.1. Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

6.2. Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

6.3. System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

6.4. Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

6.5. How “Do Not Track” requests are handled

This Application does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their privacy policies.

6.6. Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

7. Transfer of Personal Data to Rookie

The Owner will be entitled to share the User’s Personal Data with Rookie (The Haddad Apparel Group Ltd) for the purposes set out in this Privacy Policy. Upon the termination of the relationship or agreement between the Owner and Rookie, the User’s Personal Data will be transferred from the Owner to Rookie and such Personal Data shall be subject to Rookie then current privacy policy.

The User consents to the use and transfer of its Personal Data as described above and acknowledges that its Personal Data may be transferred to any of the countries in which Rookie is situated.

8. Definitions and legal references:

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person (or juristic person, where applicable).

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor / Operator)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner / Responsible Party)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

Cookies

Small sets of data stored in the User's device.

This privacy policy relates solely to this Application, if not stated otherwise within this document.

[APRIL 2020]