

EXTERNAL DIGITAL MARKETING POLICY

Version:	1.0
Last updated:	10 May 2021
Target audience:	All Adapt IT external stakeholders or interested parties in our business and its activities, including our customers, suppliers, competitors, investors, the media, and any other interested party
Owner:	Mbali Mbhele whose role is Brand Manager or their replacement
Reviewer:	Adapt IT Legal
Approver:	Chairperson of Social and Ethics Committee
Date approved by the Committee:	18-May-2021
Implementation date:	19 March 2021
Next revision date:	4 April 2022
Other relevant policies:	Information Security Policy, Acceptable Usage Policy, Grievance Policy and Information Security Incident Response Plan



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INTRODUCTION

Welcome to our external digital marketing policy (also known as our digital media community rules). We operate various digital media communities on various digital media services and are glad to have you as a community member. We encourage you to publish content and interact with us and other community members through our communities. However, engaging on our digital media communities can become a negative experience if we do not have a few rules to ensure a positive experience for everyone. Please take a moment to read this policy and keep our rules in mind whenever you publish content to or do anything else on our digital media communities.

This is our official external digital marketing policy (or digital media community rules). Please familiarise yourself with them because they apply to you as a member of one of our digital media communities.

PURPOSE

Please feel free to express yourself through our digital media communities. We encourage you to engage with us and other community members in any way that you can. However, we also need to make sure that any conversations through our digital media communities stay respectful, do not cause harm, are appropriate, do not break any laws, and are consistent with our policies. This is why we have digital media community rules. The purpose of this policy is to ensure that you and our other community members have a friendly and rewarding experience interacting with us and one another through our digital media communities.

The purpose of this policy is to ensure that engaging with us and other community members on our digital media communities is a positive experience for you and other community members.

GLOSSARY OF WORDS AND PHRASES

content means any text, image, audio, idea or concept, video recording or virtual action such as 'liking';

communities mean the digital media communities listed in the communities' clause below;

community members mean any employees, moderators, attendees, vendors, sponsors, speakers, volunteers, or natural person participating in our communities;



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our digital media communities mean a page, group, channel, or similar location on one of the communities which we have identified as being an Adapt IT community. For example, our Adapt IT Facebook page; **participating** means sharing content, interacting, or communicating in our communities; and **we, us, or our** means Adapt IT (Registration number: 1996/006272/07) and those related to it.

SCOPE

We expect all community members to follow the principles of this policy. This policy covers all our communities, any virtual event, and all related events (social or otherwise).

AUDIENCE

The policy applies to all external stakeholders or interested parties in our business and its activities, including our customers, suppliers, competitors, investors, the media, and any other interested party.

COMMUNITIES

This policy applies to your conduct on any of our communities on any digital media service. Digital media is a broad term that covers any existing or future digital tool or other kind of technology that allows one person to publish the same message to many people in a public or semi-public forum at the same time using the Internet or a similar communications network. This includes:

- **social networking services** – like Facebook;
- **micro-blogging services** – like Twitter or Tumblr;
- **professional networking services** – like LinkedIn;
- **video and photo sharing services** – like YouTube, Instagram, or Flickr;
- **blogs** – like corporate or personal blogs;
- **forums and discussion boards** – like Reddit;
- **wiki websites** – like Wikipedia;



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- **instant messaging applications** – like WhatsApp, WeChat, Facebook Messenger or iMessage when used to send group messages;
- **video-conferencing or virtual event hosting services** – like Zoom, Microsoft Teams, or Google Meet; and
- **any other electronic communications** – like email or SMS when used to send the same message to multiple recipients.

This policy applies to you as a member of our digital media communities – like our Adapt IT specific Facebook pages or groups, Twitter interactions using our mentions and hashtags commonly associated with us, and our other places online where we engage with community members.

CONSENT

As a minimum, you must be at least 13 years old to participate in our digital media communities. You may not post your content without your parent or legal guardian's knowledge and consent if you are not at least 18 years old or otherwise a minor in your jurisdiction. If your content contains any personal information or the likeness of a minor, you may not post the relevant content unless you are the minor's parent or legal guardian.

RELEVANCE

Our digital media communities are spaces for you to discuss topics relevant to our business, for us to communicate with you about our products and services, and for us to connect you on our official website. You should only publish content that is relevant. Anything contrary to our community purpose will be irrelevant, including:

- **links** to external websites not related to us or our products and services';
- **adverts** for products or services other than ours – like your products or services or those of a competitor;
- **promotional competitions** other than ours – like your promotional competitions or those of a competitor;
- **spam** or anything else published more than once or in more than one place;
- **donation requests** unless we have authorised you to publish them in writing;
- **acknowledgement requests** – like asking for 'votes', 'likes', or 'retweets';



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- **personal contact information** because it puts your privacy at risk – like your email address or phone number; or
- **anything else** that is not relevant to the purpose or conversations on the digital media community in question.

Our digital media communities exist for certain purposes and you should not publish anything to them outside of those purposes because it will be irrelevant.

NETWORK RULES

It is important that you understand the rules of each digital media service. This includes the written rules like their terms of service and the unwritten rules like the manners and etiquette of that digital media service that its members generally subscribe to.

You must comply with the written terms of service and the unwritten rules of etiquette for each digital media service.

Network terms

You must comply with the terms of service of the relevant digital media service. Terms of service for the most prominent digital media services that we have communities on include:

- **Facebook** – www.facebook.com/legal/terms; and
- **Twitter** – www.twitter.com/tos.

Network etiquette

A good rule of thumb is to generally behave on a digital media service as you would behave in real life. This means being polite, courteous, and using common sense. Each digital media service may have additional rules of etiquette that you are responsible for learning and practising as a member of that community.



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OUR CONTENT

Not our views

We are always glad to hear from you and encourage you to engage through our digital media communities, but what you and other community members publish on our digital media communities does not necessarily reflect our views. In fact, the views you and other community members express are yours or theirs alone and not ours. What you and other members publish on our digital media communities are your views and not our views.

Professional advice

While our content creators may be experts in their respective fields, please bear in mind that our content is informational, and you should not view it or place reliance on it as professional advice. Your reliance on any information we provide in our communities is solely at your own risk.

RESPONSE TIMES

We will do our best to reply to anything that you publish to our digital media communities or send directly to us through digital media within a reasonable time, but there may be times when we take longer to reply to you. We generally moderate our digital media communities from 08h30 to 16h30 on weekdays other than public holidays. We also generally have reduced hours for replying to anything you publish after hours, on the weekend, or on public holidays. We may also sometimes only reply to these on the next available working day. However, we reserve the right to not respond at all or respond at a time best suited to us.

We will do our best to respond in a timely manner to anything you publish to our digital media communities but are not liable for failing to do so.





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NO ENDORSEMENT

We appreciate it when you post content to our digital media communities and we may acknowledge it with a 'like', 'retweet', 'favourite', or other way of acknowledging it depending on the particular digital media service on which you published it. But the mere fact that we acknowledge something you publish does not mean that we endorse it in any way. We only endorse something if we explicitly say that we do in writing.

We do not endorse anything you publish to our digital media communities merely by acknowledging it in any way.

WE MAY USE YOUR CONTENT

By sharing any content in any of our communities, you acknowledge that we may use any of your content. This includes your ideas, personal information, likeness, or digital media handle – subject to relevant data protection and other laws. We may use your content in any of our digital media communities, and in our business. Accordingly, you must not submit any ideas or content that you wish to keep confidential or to sell and for which you expect to receive compensation.

WE MAY SUBMIT YOUR CONTENT TO LAW ENFORCEMENT

We may submit your content to law enforcement if we believe in good faith that disclosure of the information is reasonably necessary to:

- detect and prevent fraud; or
- protect the safety of the public or an individual.

PROHIBITED CONDUCT

We believe in freedom of speech and we encourage you to conduct yourself as you please (within reason) on our digital media communities, provided that it does not amount to abuse. You may respectfully disagree with someone,





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but you are not allowed to attack them personally. You may not engage in any of the following prohibited conduct:

- **discrimination**, which means treating someone in a certain way based on prejudice – like racism, homophobia, bigotry, or other kinds of prejudice;
- **hate speech**, which means attacking someone based on their attributes – like their gender, ethnicity, religion, race, disability, or sexual orientation;
- **harassment**, which means harming someone or threatening to harm them – like bullying, intimidation, or stalking; or
- **trolling**, which means a specific way of harassing someone online by intentionally sowing discord, starting arguments, or publishing objectionable content.

You may speak freely on our digital media communities, provided that it is not abuse – which includes any discrimination, hate speech, harassment, or trolling.

PROHIBITED CONTENT

We look forward to having your content on our digital media communities and want you to feel empowered to publish anything within reason. But you may not publish any prohibited content including:

- **illegal content** that the law prohibits – like child pornography, pirated content, or content that otherwise infringes someone else's copyright or other rights;
- **harmful content** that could cause harm to someone – like defamatory comments, fraudulent claims, or untrue statements;
- **offensive content** that could reasonably offend someone – like pornography, obscenities, or anything intended to shock someone; or
- **impermissible content** – contrary to any codes or standards that we subscribe to and of which we make you aware.

You may publish anything to our digital media communities except for prohibited content that is illegal, harmful, offensive, or impermissible.



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SUPPORT ENQUIRIES

Please direct any support enquiries to our traditional service channels, enquiries@adaptit.com, to ensure a response.

FEEDBACK

Please use the relevant 'contact us' channels on our website for feedback about our goods or services.

COMPETITIONS

We run promotional competitions through digital media from time to time. These promotional competitions are regulated by rules that determine what entries we accept, how we randomly select winners, and how auditors or other monitoring parties monitor the competition. The law requires us to have these rules and to appoint an external party to oversee that the competition is conducted fairly and according to the rules. A copy of the rules is available to you on request if you are an entrant. We have conversations with you about our promotional competitions, but please note that certain conduct in relation to them is unacceptable and may result in recourse against you in terms of this policy. You may not engage in any of the following prohibited conduct:

- **unjustified outcries**, which means strong expressions of public disapproval or anger based on false assumptions – like *"The competition was rigged!"* (our competitions are run strictly in accordance with the law and any baseless claim to the contrary is defamation against us);
- **discriminatory objections**, which means negative comments about the competition or its results based on attributes of the individual entrants or winners, including their gender, ethnicity, religion, race, disability, or sexual orientation – like *"I can't believe only [insert attribute here] people won!"* or *"Not even a single [insert attribute here] person won!"* (anyone is allowed to enter our competitions and the winners are randomly chosen under the supervision of an external party – no one has any control over who wins or who does not and there may be multiple winners with a single attribute and none with yours); and
- **prohibited discussions**, which means certain aspects of promotional competitions that we are not allowed to talk to you about in terms of our promotional competition rules, like the personal details of the winners.



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If you do not win a promotional competition, please do not let yourself down by conducting yourself in any of these ways on digital media. We are sure that you will want to be a good sport and join us in congratulating the winners. There is always an opportunity to try again to win next time.

Our promotional competitions are run strictly in accordance with the law to ensure that they are fair, and everyone has the same chance of winning regardless of their gender, race, or other attributes. If you dispute this, ask us for a copy of the promotional competition rules and satisfy yourself.

REPORT

Unfortunately, other community members may not abide by this policy and you may report them to us. You should not feel bad about reporting your fellow community members if you have a legitimate reason to think that they have breached this policy, particularly if they have done something to negatively affect you. However, you should not report anyone lightly. We may regard any use of our reporting facility to censor discussion itself as a breach of this policy. We welcome any legitimate reports of breaches of this policy by any community member.

MODERATION

Each digital media community has features that allow us to edit or completely remove published content under certain circumstances. We value your contributions to our communities and will never, without justification, use these features to edit or remove content you publish. But, as the moderator of our digital media communities we are responsible for overseeing their content. We have complete discretion to edit or remove anything you publish on our digital media communities that we think is inconsistent with this policy without notice to you. We may also impose filters on our digital media communities depending on the features of the relevant digital media service that prevent you and other community members from posting content containing certain keywords in the first place. We may moderate any of the following things as described above among others:

- anything that is not **relevant** to a digital media community or the conversation in question;
- anything that results from **prohibited conduct**, including discrimination, hate speech, harassment, or trolling;



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- **prohibited content**, including content that is illegal, harmful, offensive, or impermissible; or
- **prohibited promotional competition related content**, including unjustified outcries, discriminatory objections, or prohibited discussions.

We may edit or remove anything that you publish to our digital media communities that is inconsistent with this policy, including anything irrelevant and any conduct, content, or promotional competition related content that this policy prohibits.

QUERIES AND REINSTATEMENT

If we have removed anything that you have published, you may email us to ask for reasons why it was removed. We will do our best to inform you of the reason for removal but are not required to do so. We also need not tell any other community members why we have decided to remove your content. Unfortunately, there may be times when we cannot give detailed legal reasons for why we have decided to remove anything you publish. We will only reinstate your removed content if we have a compelling reason to do so.

You may ask us why we have moderated your content and to reinstate it, but we are not obliged to tell you the reason or to reinstate it unless there are compelling reasons to do so.

RECOURSE

We are proud of the fact that you and other members of our digital media communities are people of integrity. As people of integrity, we trust you to abide by this policy. However, there may come a time when you or another community member breaches this policy in a way that calls for action from our side. We have absolute discretion to take action against you if we deem you have breached this policy and may take recourse against you in the form of a suspension or a ban.



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Suspension

We may suspend your right to participate in any of our digital media communities if you do not comply with this policy, which means that you will not be able to access it for a period of time. Some digital media services do not allow the temporary suspension of community members, in which case we may ban you instead.

Bans

We may ban you from any of our digital media communities outright under extreme circumstances, which means that you will not be able to access it for the foreseeable future.

Other accounts

We may also ban or suspend any other digital media accounts that we suspect you to be operating through after we have taken recourse against you through your initial account.

Appeals

If we have suspended or banned you, you may appeal to us to reinstate your access to a digital media community. We will provide you by email with steps to take to ask to be reinstated if we have suspended or banned you so that the process is as just and equitable as possible.

We may take recourse against you for breaching this policy by suspending or banning you from any of our digital media communities.

THIRD-PARTY LINKS

Links on our digital media communities may lead you to third-party websites. Third-parties other than us control these websites. We are not responsible for the content on those sites.

We are not responsible for any content on third-party websites linked to from our digital media communities.





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OTHER TERMS

There are various other sets of terms that also apply to your use of our digital media communities. You are also bound by these other terms.

You are bound by our other terms that apply to your use of our digital media communities.

QUESTIONS

We want you to understand this policy as best as you can so that you can comply with it easily. If there is any aspect of this policy that you do not understand or if you have any questions about this policy, please contact us using the contact information on our contact us page available here: <https://www.adaptit.com/contact-us>.

Please contact us if you have any questions about this policy.

REVIEWING AND UPDATING THIS POLICY

We will review this policy in April 2022. We have listed the review information below:

DATE	VERSION	BY WHOM	DESCRIPTION OF UPDATES
16 April 2022	1.2	Adapt IT Digital Media Team	Digital trends and applications



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APPROVAL AND ADOPTION

This policy has been approved and adopted by the following authorised Adapt IT representatives:


Mbali Mbhele

Signature

Mbali Mbhele
Brand Manager

10 May 2021

Date

DocuSigned by:

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Signature

Oliver Fortuin
Chairperson of Social and Ethics Committee

18-May-2021

Date