

## 1. Introduction

- 1.1. We respect your privacy and will protect your personal information. This policy tells you how we (hereinafter, “we”, “us”, “our” or “Company”), will process and protect your personal information when you make use of any of our websites, social media platforms or other sites or mobile applications, if any, that we may operate from time to time and/or purchase and/or access any of our products and/or services on such sites and platforms (hereinafter collectively “Site/s”).
- 1.2. In order for us to assist you, you will have to share information with us and we will ensure that we comply with the lawful processing requirements stipulated in terms of the Protection of Personal Information Act 4 of 2013 (“POPI”), as amended, and where applicable, other data protection laws, and keep your personal information strictly confidential.

## 2. What Personal Information we collect

- 2.1. When you interact with us, you may provide us with personal information or we may collect personal information from you by law (we are required by law to verify the identity of our clients) or under terms of a contract we have with you (for example by subscribing to our products and/or services). You can choose not to provide personal information when requested. However, without your requested personal information, we may not be able to provide or continue to provide you with the products and/or services offered by the Company or allow you full access to our Site. If you refuse, we may have to cancel a product and/or service you have with us but we will notify you if this is the case. We will only collect, use, store and transfer the minimum personal information that we deem necessary to process for ordinary business purposes.

## 3. Personal information we collect from you may include:

- 3.1. your first and last or company name, email address, phone number, billing information VAT registration number and other contact information, and any other information that you may provide to us via the Site;
- 3.2. log-in and account information for authentication purposes and account access;
- 3.3. your marketing preferences;
- 3.4. demographic data such as your gender, age, country and preferred language;
- 3.5. data about how you and your PC or device interact with us, including web pages you visit when you use our Sites and device, connectivity and configuration data.
- 3.6. to send you a quote or invoice you, we might collect your publicly available personal information from the Internet.
- 3.7. It is not standard practice for us to collect sensitive personal information about you, such as information relating to your health, religion, political beliefs, race or sexual orientation, except with your express consent or unless we are required to do so by law. If we link other data with your personal information as provided to us, we will treat that linked data as personal information.

## 4. How we collect your Personal Information

- 4.1. We may collect your personal information in a variety of ways when you interact with us, including when: -

- 4.1.1. You engage us to provide our products and services;
- 4.1.2. you create an account with us;
- 4.1.3. we process orders and payment transactions;
- 4.1.4. we respond to your enquiries and requests;
- 4.1.5. as a result of communications between you and our representatives;
- 4.1.6. we obtain feedback from you about our products and/or services;
- 4.1.7. we conduct our administrative and business functions;
- 4.1.8. you register for any of our events, workshops and/or seminars;
- 4.1.9. you subscribe to our mailing lists and newsletters;
- 4.1.10. we market our solutions and services to you;
- 4.1.11. you access and use our Sites; and/or
- 4.1.12. you apply for employment with us.

4.2. We may also collect your personal information from third party sources and third parties including public databases, business partners with whom we offer co-branded services or engage in joint marketing activities, and third parties that provide list enhancement or similar services, to the extent that this is permitted by applicable law.

4.3. As you interact with our Site, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

## 5. Purpose for which we use your Personal Information

- 5.1. We will only use your personal information when we are permitted to do so by law. Most commonly we may use your personal information to: -
- 5.1.1. send communications to you;
  - 5.1.2. establish, manage, and maintain our business relationships;
  - 5.1.3. respond to inquiries and requests;

- 5.1.4. develop, provide, and improve our services and products;
- 5.1.5. inform you about our services and solutions;
- 5.1.6. obtain feedback from you on our services and solutions;
- 5.1.7. provide you with a more personalised experience when you interact with us;
- 5.1.8. conduct administrative and business functions;
- 5.1.9. update our records and keep contact details up to date;
- 5.1.10. enable you effectively to use and to improve Sites,
- 5.1.11. compile website usage statistics;
- 5.1.12. enable you to subscribe to newsletters and mailing lists;
- 5.1.13. enable you to register for our or any of our business partners events, workshops and seminars;
- 5.1.14. recruit staff; and/or
- 5.1.15. assess the performance of our Sites and to improve their operation.

## **6. Disclosure of Personal Information**

- 6.1. We will not disclose your personal information to anyone except as provided in this policy. By visiting our Site, and or subscribing to our products and/or services you automatically consent to us processing your personal information. It may be necessary for us to disclose or transfer your personal information to suppliers, affiliates, partners or agents in order to provide you with our products and/or services.
- 6.2. We and our partners will need to disclose your personal information to our employees in order to provide you with our products and/or services. Our employees are contractually bound to keep all personal information confidential. We will also disclose your personal information if we are required to do so by law.

## **7. Retaining your Personal Information**

- 7.1. We retain your personal information for as long as is necessary to fulfil the purposes for which it was collected, or to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. Depending on the purpose, retention periods will vary. The criteria we use to determine retention periods include whether:
  - 7.1.1. we are under a legal, contractual or other obligation to retain personal information including pursuant to data retention laws, as part of an investigation or for litigation purposes;
  - 7.1.2. personal information is needed to provide our solutions and services business including performance improvement and to maintain accurate business and financial records;

- 7.1.3. there are automated means to enable you to access and delete your personal information at any time. We will generally retain personal information for a shorter period of time, where this is not the case;
- 7.1.4. the personal information is sensitive personal information in which event we will generally retain this for a shorter period of time;
- 7.2. you have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.

## 8. Use of Cookies

8.1. We use “cookies” on our Site which enable us to improve your future visits to our Site as well as provide you with a more user-friendly experience. Cookies are text files with small pieces of data — like a username and password — that are used to identify your computer as you use a computer network and may contain personal data that may identify a user to a website. Our Site may make use of the following cookies and some of these cookies are placed by us and others are placed by our third party plug-ins, suppliers or advertisers. These cookies may be deleted from your device at different times, such as the end of your browsing session (when you leave the Site) or after a pre-set amount of time, or they may exist and function on your device until such time that you proceed to delete them:

### 8.1.1. Strictly necessary cookies / essential cookies:

These cookies are necessary for the Site to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to request for services, such as setting your privacy preference, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the Site may then not work. These cookies do not store any personally identifiable information.

### 8.1.2. Performance cookies / Site analytics cookies:

These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our Site. They help us know which pages are the most and least popular and see how visitors move around the Site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our Site.

### 8.1.3. Functional cookies:

These cookies enable the Site to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly. These cookies remember who you are as a user to our Site. We use them to remember any preferences you may have selected on our Site, like saving your user name and password or settings.

### 8.1.4. Targeting cookies:

These cookies may be sent through our site by our advertising partners, if any. They may be used by those companies to build a profile of your interests and show you relevant adverts on other websites. They do not store personal information directly, but are

based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

## 9. **Why do we use Cookies?**

9.1. These files serve a number of useful purposes for you, including:

9.1.1. granting you access to restricted content;

9.1.2. tailoring our site's functionality to you personally by letting us remember your preferences, location or device type;

9.1.3. improving how our site performs;

9.1.4. understanding who our audience is so that we can provide content most relevant to you;

9.1.5. allowing third parties to provide services to our site; and

9.1.6. helping us deliver interest-based advertising where appropriate in compliance with the applicable laws.

## 10. **Deleting Cookies**

10.1. Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. Deleting or no longer accepting cookies may prevent you from accessing certain aspects of our site where cookies are necessary or because our site forgot your preferences.

## 11. **Social Media**

11.1. We operate and communicate through our designated channels, pages and accounts on some social media sites to inform, help and engage with our customers. We monitor and record comments and posts made about us on these channels so that we can improve our services.

11.2. The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users.

11.3. When you engage with us through social media, your personal information may be processed by the site owner; this processing occurs outside of our control and may take place in a country outside South Africa that may have different privacy regulations.

11.4. We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible but cannot guarantee that we will read or reply to all messages sent to any of our official social media accounts and/or associated business partners.

11.5. Consistent feedback and helpful suggestions will be given to the relevant people within the Company for consideration, but we cannot guarantee that any feedback or suggestions will be acted upon by us.

## 12. **Security of Personal Information**

- 12.1. We take all reasonable, technical, organisational and appropriate measures to keep your personal information secure however, we cannot guarantee the absolute security of your personal information.

## 13. **International transfers of your Personal Information**

- 13.1. It may be necessary for us to process your personal information in other countries, either to carry out your instructions or for ordinary business purposes, or to provide you with the products and services of our business partners who may process your personal information in the jurisdiction outside of South Africa. When you make use of any of our business partners products and or services, you specifically consent to us transferring and sharing your personal information with our business partners, and for our business partners to process your personal information. These countries may not have the same level of protections as is required by South African law. Where this is the case, we will only process your personal information with your consent. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles, associated policies and practices.

## 14. **How you can access, correct, delete and/or update your Personal Information**

if you wish to exercise any of the rights set out below, please contact our Information Officer.

### **You have the right to:**

- 14.1. Request access to your personal information. This allows you to receive a copy of your personal information held by us and to check that we are lawfully processing it.
- 14.2. Request correction of your personal information held by us. This allows you to have any of your incomplete or inaccurate information corrected, although we may need to verify the accuracy of the new information that you provide.
- 14.3. Request erasure of your personal information. This allows you to request that we delete or remove your personal information where there is no justifiable reason for us to continue processing the information. In addition, you have the right to request us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information in order to comply with a legal requirement. Please note that for specific legal reasons which will be notified to you, we may not always be able to comply with your request of erasure.
- 14.4. Object to processing of your personal information. You may object to our processing of your information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 14.5. Request restriction of processing of your personal information. This allows you to request that we suspend the processing of your personal information in the following scenarios: -
- 14.5.1. if you want us to establish the accuracy of the information;

- 14.5.2. where our use of the information is unlawful but you do not want us to erase it;
- 14.5.3. where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims;  
or
- 14.5.4. you have objected to our use of your information but we need to establish whether we have overriding legitimate grounds to use it.
- 14.6. Request the transfer of your personal information to you or to a third party. We will provide you, or a nominated third party, with your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 14.7. Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before the withdrawal of your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- 14.8. No fee usually required. You will normally not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 14.9. What we may need from you. We may need to request specific information from you to assist us to confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response.
- 14.10. Time limit to respond. We will endeavour to respond to all legitimate requests within 30 days. Occasionally it may take us longer than this if your request is particularly complex or if you have made a number of requests, in which case, we will notify you of the delay and keep you updated.

## 15. **Links to other sites**

- 15.1. When you use our products/services and/or visit/view our Site, you could be directed to other site/s that are beyond our control. These other site/s may send their own cookies to you, collect data or solicit personal information. We do not control the privacy policies of those third party and we cannot be held liable for the use thereof by you for any reason whatsoever.

## 16. **Updates to this policy**

- 16.1. We may occasionally make changes to this policy. When we make material changes to this policy, we will provide you with a prominent notice on our Site or send you an email.