

PRIVACY POLICY

FOR

OUDTSHOORN ONLINE CC t/a WebWorX

IN TERMS OF

THE PROVISIONS OF

THE PROTECTION OF PERSONAL INFORMATION ACT, NO 4 OF 2013

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1 PREAMBLE

- 1.1 Oudthsoorn Online CC t/a WebWorX (“the CC”) is committed to respecting client privacy and committed to protecting all personal data as required in terms of the Protection of Personal Information Act 4 of 2013.
- 1.2 This policy, together with any terms and conditions as published on the CC's website, set out the privacy practices for the CC.
- 1.3 This policy sets out how personal data collected about clients via their interactions with the CC’s online content, such as contact forms and tools, and/or provided directly by a client, is processed.
- 1.4 Clients will be made aware of the importance of this policy with the purpose to understand why data is being collected and what the CC does with that data because by accessing, browsing or otherwise using the CC’s website, a client is confirming that he/she has read, understood and agrees to the terms of this Privacy Policy, and therefore, agrees to the collection and use of his/her data in accordance with this statement, until further notice or update of his/her preferences.
- 1.5 The CC’s website and services may contain links to other independent websites which sites may ask a client to provide information to them. Such requests and information provided is not under the CC’s control, and the CC is by no means responsible for the privacy practices of those other sites. Clients will be encouraged to be aware when leaving the CC’s website to read the privacy statement of each and every website that he/she may enter thereafter.
- 1.6 This policy may be amended from time to time by updating the website or other documents.

2 TYPE OF INFORMATION COLLECTED

The following types of information is collected from clients:

- 2.1 When accessing the CC’s website and/or using any of the services that the CC renders or any other third parties who host, maintain or support such delivery of services, may collect personal and technical information about such clients.
- 2.2 The personal information collected from a client may typically include the following:
 - 2.2.1 Full name and contact details (including date of birth, contact number, email and postal address).
 - 2.2.2 Any phone number or email used to get in touch with the CC.
 - 2.2.3 Information relating to a client’s identity, residential address, marital status, information about his/her family and their close associates, and such other information as may be required by prescriptive legislation.
 - 2.2.4 A client’s banking details where required such as where the client is paying levies by debit order.
 - 2.2.5 Details about the client’s areas of interest to enable the CC to send the client notices and

marketing information about similar services.

- 2.3 Technical information that may be collected anonymously and will include the usage information about visits to the CC's website (via 'cookies' which enables the CC's website to gather information about clients and their preferences). The technical information collected may include:
- 2.3.1 Internet Protocol (IP) address used to connect the client's device to the Internet.
 - 2.3.2 URL click stream to and from the CC's site (including date and time).
 - 2.3.3 Device operating system and platform.
 - 2.3.4 Device location data (if function is not disabled on the client's device).
 - 2.3.5 Browser and plugin types and versions.
 - 2.3.6 Login usernames.
 - 2.3.7 Time zone settings.
 - 2.3.8 Pages and/or people/information viewed and/or searched for.
 - 2.3.9 Time spent on certain pages and page interaction information (such as scrolling, clicks and mouse-overs).
 - 2.3.10 Methods used to land and exit from the website and/or page.
 - 2.3.11 Page response times
 - 2.3.12 Download errors
- 2.4 Communication history between a client and the CC, including a record of the email, telephone and postal correspondence created when a client contacts the CC.

3 BASIS OF PROCESSING INFORMATION

- 3.1 The CC will only process a client's information in pursuance of a legitimate interest.
- 3.2 The legal grounds under data protection legislation for processing a client's personal data are contained in the Protection of Personal Information Act 4 of 2013 and are as follows:
- 3.2.1 It is necessary for the performance of a contract to which the client is a party, or to take steps prior to entering into a contract with the client, for the CC to render a service to a client;
 - 3.2.2 The client has given his/her consent to the CC to the processing of his/her personal data for one or more specific purposes, namely:
 - 3.2.2.1 where the client has given his/her consent to receive electronic communication by the CC; and/or
 - 3.2.2.2 to process a client's Special Personal Information.
 - 3.2.3 It is necessary for the purposes of the CC's legitimate interests, except where its interests are

overridden by the interests, rights or freedoms of affected individuals (such as the client). To determine this, the CC shall consider a number of factors, such as what the client was told at the time he/she provided his/her data, what the client's expectations are about the processing of the data, the nature of the data and the impact of the processing on the client. The CC's legitimate interests include processing necessary to improve and to promote its services and to better understand its clients' interests and to administer the technical aspects of the CC's services;

- 3.2.4 Where needed to comply with a legal obligation;
- 3.2.5 Where needed to protect a client's interests; and/or
- 3.2.6 Where it is needed in the public interest or for official purposes.

4 USE OF INFORMATION

- 4.1 The CC will hold and use personal information about clients in the following ways:
 - 4.1.1 To fulfil its contractual and constitutional obligations to clients;
 - 4.1.2 To share a client's information with others where necessary to fulfil the CC's services for the client or where acting as agent for a third party on behalf of a client;
 - 4.1.3 To comply with its statutory and regulatory obligations, including verifying a client's identity;
 - 4.1.4 To communicate with a client during the course of providing its services including enquiries and requests;
 - 4.1.5 To, for statistical purposes, enable the CC to analyse figures to help it manage its business and plan strategically for the future;
 - 4.1.6 To track the client's use of the CC's service, including the client's navigation of the CC's website in order to improve the website performance and user experience;
 - 4.1.7 To notify clients about the activities of the CC.

5 DATA RETENTION

Clients' personal data will be retained for as long as they remain a client of the CC unless the CC is under regulatory or statutory duties to hold a client's data for a longer period.

6 SHARING OF INFORMATION

- 6.1 The CC may pass a client's details to the following entities:
 - 6.1.1 persons who carry out certain activities on behalf of the CC as part of the CC providing its services to clients in terms of its constitution;
 - 6.1.2 payment of service providers;
 - 6.1.3 credit reference agencies;
 - 6.1.4 cloud computing host providers;

- 6.1.5 technical support service providers;
 - 6.1.6 financial service providers;
 - 6.1.7 business partners; and
 - 6.1.8 sub-contractors.
- 6.2 The CC will also pass a client's details where necessary to professional third party service providers.
- 6.3 The CC will also disclose certain personal information to third parties if the CC is under a duty to disclose or share a client's personal data in order to comply with any legal or regulatory obligation, or to protect the rights, property, or safety of the CC and all or any of its clients.
- 6.4 The CC will not share a client's information with third parties for marketing purposes without obtaining the client's prior written consent.

7 SECURITY OF DATA

- 7.1 The CC is committed to ensuring that all client information is secure. Client data is held on secure servers with necessary technological and operation measures put in place to safeguard it from unauthorised access, as far as can reasonably be required for purposes of transacting with the CC. Where possible any identifiable information will be encrypted or minimised.
- 7.2 All information collected via the CC's website is stored and encrypted on secure servers. The CC is continuously auditing its website's performance and security, to prevent any risk to the website's security and data collection. If a client has any reason to believe that the CC's website is not performing at its best in securing client data, it is expected of the client to immediately report this to the chairman of the CC or the Information Officer of the CC.

8 USERNAMES AND PASSWORDS

If a client has been given a username and password which enables him/her to access certain parts of the client's data on the CC's systems, such client is responsible for keeping it confidential and not share such with anyone.

9 UNAUTHORISED ACCESS TO PERSONAL DATA

- 9.1 The data collected by the CC from clients may be stored and processed by staff who work for the CC or for one of its suppliers. Such staff may be engaged in the fulfilment of the contract and/or services to the client. The CC has taken all the necessary steps to ensure that all client data is treated by them securely and in accordance with this policy.
- 9.2 The CC undertakes business and website audits which enable it to further develop its strict procedures and security features to prevent unauthorised access.

10 ACCESS TO AND UPDATE OF INFORMATION

- 10.1 Clients have a right to request a copy of the personal information held by the CC about them.

- 10.2 Clients also have the right to request that information the CC holds about them, which may be incorrect, or which has been changed since first supplied to the CC, be updated or removed. These requests are free of charge and can be sent to the Information Officer of the CC.

11 REQUEST FOR ERASING OR DESTROYING DATA

- 11.1 A client may at any time ask the CC to delete or remove personal data where there is no good reason for the CC to keep or continuing to process it. The client also has the right to ask the CC to delete or remove his/her personal data where the client has successfully exercised his/her right to object to processing, where the client has withdrawn consent for the CC to process it, where the CC may have processed the client's information unlawfully or where the CC is required to erase the client's personal data to comply with a provision in law.
- 11.2 The CC may not always be able to comply with a client's request to delete personal data if specific legal responsibilities or requirements prohibits the CC from doing so. This will however be communicated to the client at the time of his/her request, if applicable.

12 WITHDRAWAL OF CONSENT

- 12.1 A client has the right at any time to withdraw any consent given to the CC to process his/her personal information.
- 12.2 Withdrawal by a client of his/her consent will not affect the lawfulness of any processing of his/her personal data carried out by the CC before the withdrawal of his/her consent.
- 12.3 Any client who wishes to withdraw his/her consent or changes his/her consent preferences at any time may do so by contacting the CC's Information Officer.

13 RESTRICTION OR OBJECTION OF DATA

- 13.1 A client may ask the CC to suspend the way in which his/her information is being used, or object to the CC processing his/her data where the CC is relying on a legitimate interest ground (or those of a third party) and the client is of the opinion that it impacts on his/her fundamental right to privacy. If a client objects, the CC may demonstrate that there are compelling legitimate grounds to process the client's information which override the client's rights and freedoms.
- 13.2 Should a client wish to restrict or stop the CC from processing his/her data, this may impact on the ability of the CC to provide its services to its clients. Depending on the extent of the client's request, the CC may be unable to continue providing the client with its service.
- 13.3 Queries or concerns about the way in which personal data is being used by the CC, must be referred to the CC's Information Officer.

14 TRANSFERRING OF INFORMATION TO ANOTHER ORGANISATION

In the event that the CC processes the client's data by automated means where the client has either provided the CC with consent to use his/her information or where the CC used the information to perform a duty in compliance with the provisions of its constitution, the client has the right to request that the CC send to him/her or to another organisation, a copy of the personal

data held by the CC about him/her, for example when the client is dealing with a different service provider. Any request to move, copy, or transfer the client's information must be in writing and addressed to the Information Officer.

15 COMPLAINTS REGARDING THE USE OF PERSONAL DATA

- 15.1 Should a client wish to raise a complaint on how the CC has handled or dealt with his/her personal data, such client can contact the Information Officer.
- 15.2 If the client is not satisfied with the CC's response or believe that his/her personal data is not processed in accordance with the law, he/she can address a complaint to the Information Regulator on: tel +27 (0) 10 023 5207; or on infoereg@justice.gov.za.