



# Privacy Policy

December 2021 | Version 1.0

**We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.**

## 1. Introduction

Welcome to our privacy policy. We are **Trio-Data Special Services (Pty) Ltd t/a Trio-Data Special Services Cape** (Registration number: **2013/068495/07**) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

**The purpose of this policy is to describe the way that we handle your personal information.**

## 2. Audience

This policy applies to you if you are:

- a visitor to our website; or
- a client or customer who has ordered or requested the goods or services that we provide.

**This policy applies to you under certain circumstances.**

## 3. Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website.
- certain information collected on registration (see below).
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below).

but excludes:

- information that has been made anonymous so that it does not identify a specific person.
- permanently de-identified information that does not relate or cannot be traced back to you specifically.

- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

**Personal information includes information we collect automatically when you visit our website. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.**

### 3.1. Common examples

Common examples of the types of personal information which we may collect, and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind.
- **contact information** – such as your phone number or email address.
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

### 3.2. Sensitive personal information

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details.
- **sensitive demographic information** – such as your race or ethnicity.
- **medical information** – such as information about your physical or mental health.
- **criminal information** – such as information about your commission or alleged commission of any offence or any related legal proceedings.
- **employment information** – including your membership of a trade union; and
- **beliefs** – including your political or religious beliefs.

## 4. Acceptance

### 4.1. Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

**You may not order our goods or request our services if you do not accept this policy.**

### 4.2. Legal capacity

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have the legal capacity to conclude legally binding contracts.

### 4.3. Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

### 4.4. Your obligations

You may only send us your personal information or the information of another data subject where you have their permission to do so.

## 5. Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email

detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

## 6. Collection

### 6.1. On order or request

When you order our goods or request our services from us, you will be asked to provide us with additional information voluntarily (**goods or services information**).

**We collect certain information when you order our goods or request our services from us.**

### 6.2. From browser

We automatically receive and record internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths are taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

**We collect certain information from your web browser, including your Internet usage information when you visit our website.**

### 6.3. Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve several useful purposes for you, including:

- granting you access to age-restricted content.
- tailoring our website's functionality to you personally by letting us remember your preferences.
- improving how our website performs.
- allowing third parties to provide services to our website, and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies, and you can find out more about them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

**We collect certain information from cookies that we may send to your computer to try and give you a personalised experience.**

### 6.4. Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor, or share any of your personal information. We merely use them to compile anonymous information about our website.

**We collect certain information from web beacons on our website to compile anonymous information about our website.**

#### 6.5. Optional details

You may also provide additional information to us voluntarily (**optional information**). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

**We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional goods or services.**

#### 6.6. Recording calls

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

#### 6.7. Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services.
- **marketing purposes** – such as pursuing lawful related marketing activities.
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website.
- monitor website usage metrics such as the total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

**We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.**

#### 6.8. Consent to collection

We will obtain your consent to collect personal information:

- under applicable law.
- when you provide us with any registration information or optional information.

**We will get your consent to collect your personal information under applicable law when you provide us with it.**

## 7. Use

### 7.1. Our obligations

We may use your personal information to fulfil our obligations to you.

## 7.2. Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

**We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.**

## 8. Disclosure

### 8.1. Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy.
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit).
- credit bureaus to report account information, as permitted by law.
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (if you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

**We may share your personal information with third parties to fulfil our obligations to you among other purposes.**

### 8.2. Regulators

We may disclose your personal information as required by law or governmental audit.

### 8.3. Law enforcement

We may disclose personal information if required:

- by a subpoena or court order.
- to comply with any law.
- to protect the safety of any individual or the general public, and
- to prevent violation of our customer relationship terms.

**We may disclose personal information to third parties if required for legal reasons.**

### 8.4. No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

### 8.5. Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

## 8.6. Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

## 8.7. Change of ownership

If we change ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## 9. Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

**Our website is hosted on a secure server and uses security measures to prevent interference by intruders.**

## 10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information on the website. You can review or update any personal information that we hold on you by emailing us, or phoning us. Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

**Please keep your personal information accurate and up to date by accessing your account online, emailing us, by phoning us.**

## 11. Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

**We will only retain your personal information for as long as is necessary.**

## 12. Transfer to another country

We will not transfer any personal information across a country border without your prior written consent.

**We may not transfer your personal information outside the country in which it was collected to a foreign country without your permission.**

### 13. Updating or removing

You may choose to correct or update the personal information you have submitted to us, by contacting us by phone or email.

**You may choose to update or remove the personal information you have submitted to us.**

### 14. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

### 15. Enquiries

If you have any questions or concerns arising from this privacy policy or how we handle personal information, please contact us.

Document Number	003/2021
Effective Date	15 December 2021
Revision Number	003/2022
Revision Number Date	30 June 2022
Approved by	Gido Jordaan
Date Approved	15 December 2021