

## PRIVACY POLICY

### 1. Application

This policy applies to all visitors to our website, associate software and customers who have subscribed to the services we offer and customers employee's who make us of the services we offer. Hereafter identified as "you" and "your".

### 2. Purpose of this Policy

We recognize the importance of protecting your personal information that you may provide to us. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way we collect, store and protect information that can be associated with a specific natural person, juristic person or entity and can be used to identify that person ("personal information").

#### 2.1 Personal information includes:

- 2.1.1 Certain information collected during registration for our services;
- 2.1.2 Optional information that you voluntarily provide to us.

#### 2.2 Personal information excludes:

- 2.2.1 Information that is anonymous in nature and therefore does not identify a specific person and/or entity;
- 2.2.2 Permanently de-identified information that is not related or cannot be specifically traced back to yourself;
- 2.2.3 Non-personal statistical information collected and compiled by us and information that you have voluntarily disclosed in an open, public environment or forum including, but not limited to, any blog, chat room, community, classifieds, internet forum or discussion board. The reason for this is due to the information being disclosed on a public platform, is therefore no longer confidential and as a result do not constitute personal information subject to protection under this policy.

### 3. Acceptance of Terms

You must accept all the terms of this policy when you register or make use of any of our services. If you do not agree with anything in this policy, then you may not register for and make use of our services. You may not access our website, associated software or use our services if you are younger than 18 years old or do not have the legal capacity to conclude legally binding agreements. By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

#### **4. Changes**

In the event that changes are made to this policy, as we may do from time to time, you will be notified of any changes by the placing of a notice on our website or by email. If you disagree with any changes made you must stop using our services and associated software. If you continue to use our services and associated software after notification of a change to the terms, the changes in the terms of this policy will apply to you and you will be deemed to have accepted the changed terms.

#### **5. Collection of Information**

##### **5.1 Registration**

Once you have registered on our website, software or once you have signed up for the use of our services, you will no longer be anonymous to us as you will provide us with personal information.

5.1.1 The personal information provided may include:

- a) Your name and surname;
- b) Company name, company registration number, VAT number;
- c) Your Identity Number;
- d) Your employment status, employer name and employer contact details;
- e) Your residential address;
- f) Your marital status;
- g) Your contact information, including postal address, email address, telephone number, postal code;
- h) Unique user ID, password

##### **5.2 Collection during Use**

To make use of our services, you will be required to provide us with additional information voluntarily during the use of our services and learning programs such as, but not limited to:

- 5.2.1 Information required to conduct psychometric assessments;
- 5.2.2 Information volunteered during de-briefings or instructor-led programs;
- 5.2.3 Information gathered for hard and soft skill audits and information required to measure hard and soft skill growth;
- 5.2.4 Information obtained as a result of your participation in our training programs, eLearning programs and related services offered by us.

##### **5.3 Optional Information**

You may also provide additional information voluntarily. This includes content or products that you decide to download from our website or during the use of our associated software, respond to surveys or in general use optional features and functionality of our website and associated software.

##### **5.4 Collection via your Browser**

We automatically receive and record internet usage information on our hosting company's server logs from your browser, such as internet protocol address, installed software, system type, screen resolution, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript features, browsing habits, click patterns, the content and pages you access on the website or via our associated software, the date and times you visit the

website or use the associated software and similar usage information. Note that other websites visited prior or after our own may place personal information within your uniform resource locator if you should visit it, but we have no control over such websites.

### **5.5 Cookies**

When you access our website or associated software we may send cookies to your computer to collect certain usage information. Cookies are small text files containing a string of characters. We typically will use session cookies and persistent cookies, which may be used by your browser when you visit our website again. Cookies collect information that is used to identify your computer as you use a computer network or to track website activity.

### **5.6 Web Beacons**

Our website may contain web beacon requests that would allow us to count page views and access cookies. Electronic images viewed as part of a webpage may act as a web beacon. Web beacons are used to compile anonymous information about our website or associated software and do not collect any personal information.

### **5.7 Purpose of Collection of Information**

- 5.7.1 We use any information provided by you for the purposes indicated to you at the time you agree to provide the information.
- 5.7.2 We also use such information for purposes of registering for our services and also during the use of our services, training programs, assessments, hard and soft skill audits and eLearning programs.
- 5.7.3 Information may also be used to provide you with our services, pursue lawful related marketing activities and for business purposes such as internal audits, accounting and business planning.
- 5.7.4 Usage Information may be used as indicated in 5.4 and 5.5 hereinabove, but also to:
  - a) Remember your information which may prevent the need for you to re-enter it should you wish to log into our website or associated software again;
  - b) Monitor website usage, including the number of visitors and the pages they accessed; and
  - c) Record your participation, entries, submission and status during any activities while making use of our services, our website and associated software.

## **6. Consent to Collection of Information**

We will obtain your consent to collect personal information as required by applicable law and at the time you provide us with any registration information or optional information.

## **7. Administrative Updates and other Communication**

We may need to send you administrative messages and emails regarding the use of our services and the website.

## **8. Disclosure of Information**

### **8.1 Information Sharing**

- a) We may share your personal information with an affiliate, in which case we will seek to require the affiliate to honour this privacy policy.
- b) We may share your personal information with our service providers under contract who assist in the conduct of our business, such as bill collection and information technology services. Our contracts with these service provider make provision that your information will only be used for the services they are contracted for and not for their own benefit.
- c) We may share your information as required by law or governmental audit to the relevant regulatory body if you contact them or us concerning your experience whilst using our services, associated software or products;
- d) We may also share and disclose your information to our employees that would require such information in the execution of their jobs.

### **8.2 Law Enforcement**

We may disclose your personal information:

- a) If required by a court order or open being served with a subpoena;
- b) If required to comply with any law;
- c) If required to protect the safety of any individual or the general public;
- d) If required to prevent the violation of our terms and conditions of service.

### **8.3 Selling of Information**

No personal information will be sold by us to any third party. Also, no personal information will be disclosed to anyone, any entity or organisation other than as provided for in this privacy policy.

### **8.4 Information used for Marketing Purposes**

We may use and disclose general aggregated information regarding customer population or the total amount of users of our services to advertisers or business partners.

Note that we will not disclose personal information to third parties unless with your consent or as provided for in this privacy policy.

In some cases, we may send you a message intended as promoting our business or any new services we may offer. You can choose to opt-out of any promotional messages.

### **8.5 Information in the event of a Change in Ownership**

Should we, for whatever reason, experience a change in ownership by; merger, acquisition, sale of assets or alienation by any other form that results in another entity being formed we may assign the rights to the personal information to such successor in title. In such event, we will indicate such transfer on our website or by communicating this over email. Should you not wish for your personal information to be held by a new owner or entity, you may request your personal information to be deleted.

## **9. Protection of Personal Information**

We take the security of personal information seriously and will always do our best to comply with any applicable data protection laws. Your personal information is protected by using established computer safeguards such as firewalls and data protection. In terms of organisational measures, only those employees who require access to your personal information for purposes of doing their jobs will be authorised to view and use it.

## **10. Accuracy of the information held**

- 10.1 Every reasonable effort will be made to ensure that the personal information we collect stays accurate and updated as necessary for the purposes it is collected.
- 10.2 We may from time to time request you to update your personal information should it be necessary to do so.
- 10.3 Should you wish to view, update or access any personal information held by us, you may lodge such a request by email or telephonically.
- 10.4 Note that to protect and safeguard your personal information we will need to take steps to verify your identity before granting access or updating your personal information.

## **11. Data Breaches**

Should a data breach confirm we will notify our customers as soon as reasonably possible. It is our customers' responsibility to notify the relevant supervisory authority or any associated person affected by the data breach.

## **12. Retention of Personal Information**

Your personal information will only be kept for as long as it is necessary to do so to fulfil the identified purposes herein.

Note that if the retention of your personal information or any records is required or authorised by law or if you consent to it, we may keep the information for a longer period. Should the information be retained we will not share or sell your personal information and abide with our obligations as it pertains to the non-disclosure of your personal information.

## **13. Transfer of Personal Information outside of the Republic of South Africa**

Any personal information may be transmitted, stored or transferred outside the borders of the Republic of South Africa to a foreign country. Servers used to store personal information may therefore be located outside the Republic of South Africa in a country that has less stringent laws. By making use of our services, accessing our website and associated software you consent to your personal information being processed in a foreign country with the full understanding that such country's laws may be less stringent when it comes to processing and safeguarding personal information.

## **14. Enquiries**

If you have any questions or concerns arising from this privacy policy or the way we handle your personal information, you are invited to contact us by email or telephonically.

## **15. Limitations**

Note that we are not responsible for, nor do we give any warranties or make representation in respect of the privacy policies or practices of third-party websites.