

## Compuscan– Privacy Policy

December 2017| Version 3.0

**We respect your privacy. Blocks 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. Audience

This policy applies to all visitors to our website and customers who have subscribed to the services we provide (“you” and “your”).

### 2. Purpose of this policy

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, use, and protect information that can be associated with a specific natural or juristic person and can be used to identify that person (“personal information”).

In South Africa, Compuscan complies with the Protection of Personal Information Act 4 of 2013, the Electronic Communications and Transactions Act 25 of 2002, the Promotion of Access to Information Act 2 of 2000, the Constitution of South Africa, and all applicable laws and regulations relating to the processing of personal data and privacy (collectively referred to as “Privacy Legislation”).

In the Philippines, Compuscan complies with the Data Privacy Act of 2012 as well as the Implementing Rules and Regulations supplementing the Data Privacy Act with the principles expressed by the GDPR. In Lesotho, Compuscan complies with the Constitution of the Kingdom of Lesotho as the right to privacy is recognised and protected therein, and with Lesotho’s Data Protection Act of 2011.

In Uganda, Compuscan applies the same general privacy principles as is applied in South Africa, seeing as Uganda is still one of the countries without official data privacy laws in place, save for a draft Data Protection Bill in progress. In Namibia, Compuscan applies the same general privacy principles as is applied in South Africa, seeing as Namibia is still one of the countries without official data privacy laws in place, save for a draft Data Protection Bill in progress. In Botswana, Compuscan applies the same general privacy principles as is applied in South Africa, seeing as Botswana is still one of the countries without official data privacy laws in place.

In Mozambique, Compuscan complies with the Constitution of the Republic of Mozambique, the Civil Code (approved by Administrative Ordinance No 22869 of 4 September 1967) and the Electronic Transactions Law (approved by Law No 3/2017 of 9 January), which all regulate the collection and use of personal data, although Mozambique is still one of the countries without official data privacy laws in place.

In Australia, Compuscan complies with the Privacy Act of 1988, the Privacy Amendment Act, as well as the Australian Privacy Principles guidelines (APP guidelines).

**This policy describes the way we handle your personal information. We respect your privacy and will do our best to protect any of your personal information that you give us. We comply with all applicable Privacy Legislation when dealing with your information.**

### 3. Personal information

Compuscan recognises that the Privacy Legislation imposes restrictions and standards which govern our information management practices and we confirm that we manage personal information as set out in this policy.

Personal information includes:

- certain information collected on registration (see below); and
- optional information that you provide to us voluntarily (see below);
- information we collect about you from third parties
- information provided to us in terms of legislation, for example the National Credit Act

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; and
- 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.

Compuscan does not store information or an opinion about your:

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices;
- criminal record.

**Personal information includes information we collect (i) on submission when you place an order; (ii) automatically when you visit this website; and (iii) information we collect about you from third party sources and (iv) information provided to us in terms of legislation. Compuscan will only collect and hold information as allowed for by the Privacy Legislation.**

### 4. Acceptance of terms

#### 4.1. Acceptance required

You must accept all the terms of this policy when you visit our site or make use of our services. If you do not agree with anything in this policy, then you may not order, register for, or use any of our services.

**You may not use any of our services if you do not accept this policy.**

#### 4.2. Legal capacity

You may not access our website or order or services if you are younger than 18 years old or do not have 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 its terms.

#### 5. Changes

We may change the terms of this policy at any time. We will notify you of any changes by placing a notice in a prominent place on the website or by email detailing the changes we have made and indicating the date they were last updated. If you do not agree with the change you must stop using the website. If you continue to use the website following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted such terms.

#### 6. Collection

**We collect certain information: on registration, when you register on our website; when you make use of our services, necessary to provide the service to you; from your web browser; from cookies we may send to your computer and from web beacons on our website to track how you use our website and to try and give you a personalised experience; and 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 services. We will also supplement any of your personal information we collect with additional information from other third-party sources.**

##### 6.1. On registration

Once you register on our website, you will no longer be anonymous to us as you will provide us with personal information. This personal information will include:

- your title, your initials, name, surname;
- date of birth, ID number;
- your postal address, email addresses, telephone numbers, and postal code, social media profiles and handles;

##### 6.2. Collection on order

When you order any services from us, you will be asked to provide us with additional information on a voluntary basis ("services information").

**We collect additional information when you place an order.**

##### 6.3. Optional details

You may also provide additional information to us on a voluntary basis ("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 the website.

##### 6.4. 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 a number of 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 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).

#### **6.5. Collection 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 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 automatically collect your Internet usage information when you visit this website.**

#### **6.6. Third party cookies**

Please note that some of our business partners (e.g. advertisers) use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any such cookie or widget is governed by the privacy policy of the company that created it, and not by us.

#### **6.7. 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.

#### **6.8. Recording calls**

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

#### **6.9. Purpose for collection**

We may use any services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. 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 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.**

## 7. Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law; and
- when you provide us with any registration information or optional information.

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

## 8. Use

**We may use your information: to send you administrative messages and email updates to you regarding the website; for marketing purposes; or for targeted content in certain, specified instances. We may use your personal information to fulfil our obligations to you. You may inform Compuscan that you do not wish your information to be used for marketing purposes.**

### 8.1. 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.

### 8.2. Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on the personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser can collect your personal information.

## 9. Disclosure

**We might disclose your information in the specific circumstances mentioned in this policy.**

### 9.1. 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 service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law; and

- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria).

**We may share your personal information with third parties for the purposes of fulfilling our obligations to you.**

## **9.2. Regulators**

If you contact us regarding your experience with using any of our products, we may disclose your personal information as required by law or governmental audit.

## **9.3. 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.**

## **9.4. Selling Information**

We may sell your personal information where you have given us your consent to do so. No personal information will be disclosed to anyone except as provided in this privacy policy.

## **9.5. Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners. In certain circumstances, and where we have got your permission, we will provide your contact details to advertisers or business partners

## **9.6. Employees**

We may need to disclose personal information to our employees that require the personal information to do their jobs.

## **9.7. Change of ownership**

If we undergo a change in 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.

## **10. Security of personal information**

Compuscan recognises the importance of keeping your information secure and we adhere to international standards around data privacy and protection. Your information is stored in a highly secure data centre (managed by a third-party data centre provider) and all data is stored, managed, accessed and transferred in a controlled environment. The information we hold may be linked or combined with other information about you, in order to ensure that your credit information profile is complete.

Compuscan has a security policy and risk management policy which regulates the Company's approach to security and risk. We have internal controls in place to ensure that only staff who requires access to your information, is granted access and also that access is monitored by our internal audit department on an annual basis

**Information is held on a third-party data server and access to information is granted to select staff, which access is monitored**

**11. 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 explicitly defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, by emailing us, or by phoning us. Please note that in order 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.

**12. Retention of personal information**

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

**13. Transfer of personal information outside South Africa**

We may transmit or transfer personal information outside South Africa to a foreign country. Personal information may be stored on servers located outside South Africa in a foreign country whose laws protecting personal information may not be as stringent as the laws in South Africa. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

**We may transfer your personal information outside South Africa to a foreign country.**

**14. Updating or removing**

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website.

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

**15. 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.

**16. Enquiries**

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