



PRIVACY POLICY

1. Introduction

- 1.1 CGNET SA (Pty) Ltd is a private company incorporated and registered (under registration number 2017/505609/07) in accordance with the laws of the Republic of South Africa, with our principal place of business at Randburg, Gauteng (“we”/”us”/”our”).
- 1.2 We take our obligations for the processing of personal information very seriously and we are committed to protecting your, our client’s (“you”/”yours”), privacy.
- 1.3 This privacy policy together with our website (cgnetsa.co.za) terms of use, governs how we treat any personal information or personal data which we collect from you, or which you provide to us.
- 1.4 We confirm that we will take all reasonable measures to protect your personal information and personal data and to keep it confidential.
- 1.5 You agree that this privacy policy and our terms of use govern your use of our website. All disputes over privacy and your data will be governed as set out in this privacy policy, terms of use and our client license agreements.
- 1.6 We are a “responsible party”, as defined in the Protection of Personal Information Act No. 4 of 2013 (“POPI”) and we have appointed Mr. Terrance Booysen as our Information Officer in terms of POPI).

2. Information we may collect from you

- 2.1 We may collect and process the following data or information from or about you:
 - 2.1.1 Information which you provide when you communicate with us (by way of email, telephone or otherwise), or personal information (as defined in POPI) which you provide to us.
 - 2.1.2 Information which you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our service or our electronic and IP updates, posting material or requesting services. We may also ask you for information when you report a problem with our website.
 - 2.1.3 If you contact us, we may keep a record of that contact.



- 2.1.4 We may ask you to complete surveys which we use for research purposes, although you do not have to respond to them.
 - 2.1.5 Details of transactions which you carry out through our website and of the fulfilment of your orders/purchases.
 - 2.1.6 Details of your visits to our website including, without limitation, traffic data, location data, weblogs and other communication data.
- 2.2 Where you provide us with personal information of a third-party data subject (for example, your company), you warrant that you have obtained all necessary consents from that data subject, including its consent for you to share its personal information with us.
- 2.3 You agree to provide accurate, truthful and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything. Failure to adhere to this requirement will entitle us to take the appropriate steps.
- 2.4 The supply of your personal information is voluntary, however, you acknowledge that we cannot complete or provide all services to you if you do not wish to supply that personal information.
- 2.5 By continuing to use our website you consent to processing, collection, storage, and use of the personal information you provide for any of the purposes set out in this privacy policy, and you consent to our collection of any changes or updates which you may provide, or which is collected by us. If you do not agree to our privacy policy, please do not use our website.

3. Categories of personal information we may process

We may process the following categories of personal information about you:

- 3.1 Personal identifiers, for example, name, surname, passport or national identity number.
- 3.2 Contact details, for example, correspondence address, telephone number or email address.
- 3.3 Client details, for example, details of individuals instructing us, employer details, personal information in any communication (including, without limitation, electronic correspondence and telephonic discussions), documents, evidence or other materials which we process in the course of providing our services; meeting details (including attendance; minutes and so on).



- 3.4 Consent records, for example, details of any consent you may have given us (including, without limitation, the date, time and manner of consent and any related information).
- 3.5 Financial information, for example, billing address, payment method, bank account number or credit card number, invoice records, payment records, SWIFT details, IBAN details, payment amount, payment date, and proof of payment.
- 3.6 Data relating to website visits, for example, traffic data, location data, weblogs, your IP address, operating system, browser type, and other communication data.

4. IP addresses and cookies

- 4.1 We may collect information about your computer, including where available, your IP address, operating system, browser type and Internet service provider, for system administration and to report aggregate information to our business partners and service providers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.
- 4.2 For the same reason, we may obtain information about your general internet usage by using a "cookie file" which is stored on the hard drive of your computer. "Cookies" refers to information which is sent from our website to your hard drive where it is saved and contains information to personalise your experience on our website. In this way, the next time you use our website, we will know who you are and that you have previously visited our website. Cookies help us to improve our website and to deliver a better and more personalised service to you. They also enable us to:
 - 4.2.1 estimate our audience size and usage pattern.
 - 4.2.2 store information about your preferences and allow us to customise our website according to your individual interests.
 - 4.2.3 speed up your searches.
- 4.3 You may refuse to accept cookies by activating the relevant setting on your browser. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting to refuse cookies, our system will issue cookies when you log on to our website.
- 4.4 Please note that our business partners and service providers may also use cookies, over which we have no control.



5. **How your information is used and disclosed**

- 5.1 We use information collected from you or from a third-party or held about you to:
 - 5.1.1 ensure that content from our website is presented in the most effective manner for you and for your computer;
 - 5.1.2 provide our services;
 - 5.1.3 provide you with information about products or services which we think may interest you;
 - 5.1.4 carry out our obligations in terms of any contracts entered into between us;
 - 5.1.5 respond to any queries you lodge;
 - 5.1.6 allow you to participate in interactive features of our website;
 - 5.1.7 notify you about changes to our services;
 - 5.1.8 maintain our internal administrative or client relationship management systems, including the use of third-party IT outsourced providers;
 - 5.1.9 carry out and manage our business operations and activities;
 - 5.1.10 carry out quality and risk management reviews and legal reporting obligations;
 - 5.1.11 in aggregate form, for internal business purposes including, for example, generating statistics and developing our strategic and marketing plans; and
 - 5.1.12 assist us in any future dealings with you.
- 5.2 We may also use your information or permit selected third parties to use your information, to provide you with information about products and services which may be of interest to you and we or they may contact you about these by post, telephone or e-mail.
- 5.3 If you are an existing client, we may contact you by electronic means with information about products and services similar to those which were the subject of a previous transaction with you.
- 5.4 We may exchange information with other parties for the purposes of fraud protection and credit risk reduction.
- 5.5 We may disclose your personal information to third parties:
 - 5.5.1 if we are under a duty to disclose or share your personal information to comply with any legal obligation;



- 5.5.2 to enforce or apply our terms of use or terms and conditions of contract and other agreements;
 - 5.5.3 to protect our, our other clients' or third-parties' rights, property or safety; and
 - 5.5.4 to assist us in providing you with our service or products.
- 5.6 We will be entitled to disclose your personal information to those of our affiliates, agents, advisors, employees or third-party service providers and suppliers who assist us to interact with you via our website, mobile communications or email, and need to know your personal information in to do so properly and efficiently. We will ensure that all those persons are bound by appropriate and legally binding confidentiality and non-use obligations in relation to your personal information.
- 5.7 If we are required to disclose your personal information due to legal or regulatory requirements, we reserve the right to do so as required to comply with our legal obligations, including, without limitation, to complying with court orders, warrants, subpoenas, service of process or discovery requests.
- 5.8 We may disclose information about our users to law enforcement officers or others, in the good faith belief that such disclosure is reasonably necessary to enforce this privacy policy, or protect our rights, property, or personal safety or the personal safety of our users or the general public.
- 5.9 We do not exercise control over third-parties' privacy policies and you should refer to their privacy policies to establish how they protect your privacy.

6. Protection of your personal information

- 6.1 To protect your personal information, we will:
 - 6.1.1 treat it as strictly confidential;
 - 6.1.2 take appropriate reasonable technical and organisational measures to keep it secure and protected against unauthorised or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or access;
 - 6.1.3 promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
 - 6.1.4 provide you with reasonable evidence of our compliance with our obligations under this privacy policy on reasonable notice and request; and



6.1.5 upon your request, promptly return or destroy any and all of your personal information in our possession or control (subject to any legal obligation on us to retain it).

6.2 You agree that we may retain your personal information to fulfil the purposes explicitly set out in this privacy policy and for as long as:

6.2.3 retention is required or authorised by law;

6.2.4 we reasonably require it for lawful purposes related to our activities; or

6.2.5 retention is required for any contract between us or retention is necessary for statistical or research purposes (subject to appropriate safeguards).

7. Storage of your personal information

7.1 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

7.2 As you know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Cross border transfer

8.1 The data or information which we collect from you may be transferred to and stored at a destination outside the Republic of South Africa. It may also be processed by staff operating outside the Republic of South Africa who work for us or for our service providers. By submitting your personal data or information, you agree to such transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data or information is treated securely and in accordance with this privacy policy.

8.2 We will not transfer the data or information we collect from you and to a third-party outside the Republic of South Africa unless the third party is subject to a law, binding corporate rules (as defined in POPI) or a binding agreement (as defined in POPI) which provides an adequate level of protection in accordance



with this privacy policy and which includes provisions which are substantially similar to those contained in this privacy policy in respect of the further transfer of your data or information unless you have consented to the transfer or the transfer is necessary for the performance of a contract between us.

9. Your rights

- 9.1 You have the right to object to the processing of your personal information.
- 9.2 You have the right to access your personal information, including to correct factual errors, review or update information. Your request can be made by sending an email to us at info@praefectus.co.za. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.
- 9.3 Should you believe that we have processed your personal information contrary to legislation in the Republic of South Africa as read with this privacy policy, you undertake to first attempt to resolve any concerns by addressing a complaint in writing to our Information Officer. If you are not satisfied with the outcome of that process, you have the right to lodge a complaint with the Information Regulator. Our Information Officer is Mr. Terrance Booysen (info@praefectus.co.za). The Information Regulator's details are infoereg@justice.gov.za, JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

10. Links to other websites

Our website may, from time to time, contain links to third-party websites. If you follow a link to any of those websites, please note that we do not accept any responsibility or liability for their privacy policies. We do not exercise control over third parties' privacy policies, and you should refer to their privacy policies to establish how they protect your privacy before you submit any personal information to their websites.

11. Changes to our privacy policy

We reserve the right to change this privacy policy from time to time, and in our sole discretion. We may send you a notice regarding material changes to this privacy policy, but we encourage you to frequently check our website for our current privacy policy at



any given time. Your continued use of our website will constitute your acceptance of the then applicable privacy policy.

12. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our Information Officer at enquiries@cgf.co.za with “Privacy Policy” in the subject line.

13. Applicable law

This privacy policy will be governed by the laws of the Republic of South Africa. You consent to the jurisdiction of the South African Courts for any dispute which may arise out of this privacy policy.

14. Copyright warning

The Copyright Act No. 98 of 1978, governs the making or printing of copies or other reproductions of the content of our website. No part of our website nor any content contained on our website may be copied or reproduced in whole or in part without our prior written consent. All rights are reserved.