



## Privacy Policy

This Privacy Policy is effective as of 1 July 2021 and was updated on 10 September 2021.

At .CoLab we recognise the importance of protecting your personal information and are committed to processing it responsibly and in compliance with the Protection of Personal Information Act (POPIA). Using our services, and any disagreements about your privacy are subject to this notice. Your privacy is important to us and maintaining your trust is paramount.

This Privacy Statement describes .CoLab's general privacy practices that apply to the personal information we collect, use and share about our Clients, Business Partners, Vendors and other organisations (as well as the individuals working for them) with which .CoLab has, or contemplates, a business relationship. This Privacy Statement does not apply to the extent .Colab processes personal information on behalf of Clients / Business Partners for their benefit and under their control (as a "processor").

We may need to update this notice to reflect any changes that occur as our business grows and changes. You will be notified 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 products and/or services. If you continue to use the website or our products and/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.

## What is POPIA?

It is the Protection of Personal Information Act, a law passed by the South African parliament, which sets conditions that any person who processes personal information must comply with.

Everyone in South Africa has to try to protect the personal information they process. POPIA aims to protect the personal information of people (like consumers and employees) so that they do not become victims of things like identity theft, which can have very serious consequences. However, POPIA does not aim to stop the free flow of information. It recognises that there needs to be a balance.

## The meaning of processing your personal information:

To help you understand this notice, we include the explanations of the terms 'personal information' and 'process' as used in POPIA:

- Personal Information and Special Personal Information is any information relating to an identifiable living or juristic person. Some examples are: *race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.*
- Process means any operation or activity, whether automated or not, concerning personal information, including: *collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information.* "Processing" will have a similar meaning.

This policy applies to you if you are:

- A visitor to our website;
- A Client who has ordered / requested the products and/or services that we provide;
- A Business Partner that we are entering into agreement with; or
- A Vendor that we are doing business with.

This policy applies to you under certain circumstances.

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration;
- certain information collected on submission of contact form; and
- information that you provide to us voluntarily;

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, social media 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).

## Collection

### On registration / Contact form

Once you register on our website, you will no longer be anonymous to us. You will provide us with certain personal information when you register on our website.

This personal information will include:

- your name and surname;
- your email address;
- your telephone number;
- your company name,
- your postal address or street address; and
- your username and password.

We will use this personal information to fulfil your request, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

### **On order or request**

When you purchase our products or request services from us, you will be asked to provide us with additional information on a voluntary basis (**products and/or services information**).

### **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.

### **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 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).

### Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

### 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.

### 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 products and/or services, or otherwise use the optional features and functionality of our website.

### Purpose for collection

We may use or process any products and/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:

- **products and/or services purposes** – such as collecting orders or requests for and providing our products and/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 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.

## Use

### Our obligations

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

### Messages and updates

We may send administrative messages and email updates to you about the website. We may wish to provide you with information about new products and/or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will send you promotional messages unless you have chosen to opt-out of them.

### Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your 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 is able to collect your personal information.

## **Acceptance**

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

## **Legal capacity**

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

## **Deemed acceptance**

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

## **Your obligations**

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

## **Disclosure**

## **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 products or services);

- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our products and/or services providers under contract who help provide certain products or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these product or services providers only use your information in connection with the products 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 (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

## **Regulators**

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

## **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.

## **No selling**

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

## **Marketing purposes**

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



communicate with you regarding things like service updates, product changes, responses to service requests and for other transactional or administrative purposes.

## **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, consultants, human resources, accounting, audit, compliance, information technology, or other personnel.

## **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.

## **Accessing, changing or removing your personal information**

You may ask us to access, change or remove your personal information from our records.

## **Enquiries**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact our POPI Officer via email:

Ronél Breytenbach  
enquiries@dotcolab.co.za  
65 Caraway Ave  
Newlands  
Pretoria East  
Gauteng

You have the right to make a complaint at any time to the South African Information Regulator for data protection issues (<https://www.justice.gov.za/infoereg/>). We would, however,

appreciate the chance to deal with your concerns before you approach the South African Information Regulator so, please contact us in the first instance.