Privacy Policy

Last updated: 24 July 2021

1. Purpose of this privacy policy:
    - The purpose of this privacy policy is to set out the basis upon which we process personal information when making use of our products and/or our services ("Products/Services") or any of our platforms (herein after collectively referred to as our "Site/s")
    - By utilising our Products/Services or any of our Sites, you are accepting and consenting to the practice described in this privacy policy.
2. Interpretation and definitions:
    - Words that are defined in the Protection of Personal Information Act No. 4 of 2013 ("POPIA") and used in this privacy policy will bear the same meaning as in POPIA unless the context requires otherwise;
    - Reference to "consent" shall include any electronic means by which you convey your acceptance and acknowledgement that you agree to us processing your personal information, whether it be by the clicking of a button, or through biometric means, subscribing, submitting or sending of a message, updating your profile or clicking "I Agree" button or pressing the "enter" button, or by any other means, to submit/convey any information to us;
    - Any reference to singular shall include plural, and any reference to a certain gender shall include the opposite gender.
3. Introduction:
    - We recognise the importance of protecting your privacy in respect of your personal information collected by us.
    - In adopting this privacy policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information. However, we do not guarantee that your personal information shall be 100% secure.
    - Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify you and the Information Regulator which is appointed in terms of POPIA.

- We will delay notifying you of the unauthorised access or acquisition of your personal information if a public body responsible for detection, prevention or investigation of offences or the Information Regulator informs us that notifying you will impede a criminal investigation.
- When we notify you of the compromise to the security of your personal information, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

4. Consent:
    - By continuing to use our Products/Services and/or our Site:
        - You agree to the terms set out in this privacy policy. If you do not agree with this privacy policy, please do not continue to use our Products/Services and/or our Site and/or the Products/Services provided by any of our partners; and
        - You agree that we may process your personal information for, amongst other things, (i) the purposes of providing you with access to our Products/Services, our Site; and (ii) for any other purposes set out in this privacy policy.

5. Variation of privacy policy:
   We reserve the right to vary the terms of this privacy policy. We will notify you of any such change and give you an opportunity to review the revised policy before you choose to continue to make use of our Products/Services and/or our Site. It is your responsibility to familiarise yourself with the most recent version of this privacy policy each time you access our Products/Services and/or our Site and before you elect to continue to make use of our Products/Services and/or our Site.

6. What type of personal information do we process:
   The personal information that we may process includes information necessary for us to provide you with the Products/Services and to protect and ensure our legitimate business interests. This may include all of the categories of personal information listed in POPIA, and amongst other, include at least all of the following information: -

- Information and content you provide. We collect the consent, communications and other information you provide when you use our Products/Services, including when you sign up for an account, create or share content, and message or communicate with us via our Site or via any other means. Our systems automatically process content and communications you and others provide to analyse context and what's in them for the purposes described below. We specifically process your name and identity number, e-mail and physical addresses, postal address, contact information, information relating to your race, gender, and age, and such other

information regarding yourself and/or your views if you choose to share same via our Site;

- Your usage. We collect information about how you use our Products/Services and/or our Site, such as the types of content you view or engage with; the features you use; the actions you take; the accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products/Services and/or our Site, and what posts, pages and other content you view on our Site. We also collect information about how you use certain features of our Products/Services and/or our Site;
- Device Information. As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Site, and we combine this information across different devices you use. For example, we use information collected about your use of our Products/Services and/or our Site on your phone to better personalize the content (including ads) or features you see when you use our Products/Services on another device, such as your laptop or tablet, or to measure whether you took an action in response to an advertisement we showed you on your device. Information we may obtain from these devices include:
    - Device attributes: information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
    - Device operations: information about operations and behaviours performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
    - Identifiers: unique identifiers, device IDs, and other identifiers, such as from services, apps, pages or accounts you use, or other identifiers unique to us or our Products/Services associated with the same device or account.
    - Device signals: Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.
    - Data from device settings: information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.
    - Network and connections: information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, and connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things like help you stream content to or through all your devices.
    - Cookie data: data from cookies stored on your device, including cookie IDs and settings.



    - Information from partners. Advertisers, Site developers, and publishers can send us information through, including our social plug-ins, such as our APIs. These partners provide information about your activities on our Site, including information about your device, websites you visit, purchases you make, the advertisements you see, and how you use their services. Whether or not you have an account with us or are logged into our Site. For example, a partner could use our API to tell us what pages you viewed, or a business could tell us about a purchase you made in its store. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.
    - Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.
- We will limit the types of personal information processed to only that to which you have given your consent and which is necessary for our legitimate business interests, or as allowed by law.

7. When will we process your personal information:

- Personal information may be processed by us when:
    - You visit, browse, register, subscribe and/or apply for and use our Products/Services and/or our Site;
    - You register to receive any notifications from us in respect of our email authentication service and/or our text message authentication service;
    - We carry out research; and
    - When or if required by law; and
    - When and if it is in your best interest.
- You acknowledge that all personal information processed by us may be stored by us and used, inter alia, for any of the purposes, but not exclusively, listed in clause 8 below.

8. How do we use your personal information:

- We may use your personal information:
    - to deliver our Products/Services, including to personalise features and content (such as services, products and advertisements) and make suggestions for you (such as pages, services and information you may be interested in or topics you may want to follow) on or about our Products/Services or on our Site. To create personalised content that are unique and relevant to you, we use your connections, preferences, interests

and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our Site; and the people, places, or things you're connected to and interested in, on and off our Site.

- to develop, test and improve our Products/Services and/or our Site, including by conducting surveys and research, and testing and troubleshooting new products and services and features.
- to select and personalise advertisements, offers and other sponsored content that we show you;
- to provide measurement, analytics, and other business services. We use the information we have (including your activity off our Products/Services, such as the websites you visit and advertisements you see) to help advertisers and other partners measure the effectiveness and distribution of their advertisements and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.
- to promote safety, integrity and security. We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products/Services, and promote safety and security on and off of our Products/Services. For example, we use data we have to investigate suspicious activity or violations of our terms or policies;
- to communicate with you. We use the information we have to send you marketing communications, communicate with you about our Products/Services, and let you know about our policies and terms. We also use your information to respond to you when you contact us;
- Research and innovate for social good. We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general technological advancement of our Products/Services.
- For helping us in any future dealings with you; and
- For any other purpose as legally authorised to do and as is allowed by law..

9. Where we store your personal information

- All of the information you provide to us is stored manually, and/or on our secure cloud based platform and/or servers operated, maintained and protected in the Republic of South Africa (RSA);
- The information that we collect from you may also be transferred to, and stored at, a destination outside the RSA (“RSA”). It may also be processed by staff operating outside the RSA who work for us or for one of our suppliers, content providers or

service providers. Such staff may be engaged in, among other things, the fulfilment of our obligations towards you, the processing of your payment details and the provision of support Products/Services. We will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with this privacy policy, and that said destination's data protection legislation is similar to POPIA, and if such destination's data protection legislation is not similar to POPIA, then we shall only transfer your personal information with your consent, or if we are required by law to do so, or under an agreement with the relevant receipt in such destination whereby we ensure that adequate safeguards are put in place to ensure the protection of your personal information;

- Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site (login facility), you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Should you share your password with anyone, you indemnify us against any damages or third party claims which resulted from said sharing;
- Records of the personal information will not be retained for longer than is necessary for operational or archiving purposes, unless retention of record is required or authorised by law. Records of the information may be retained for periods in excess of those contemplated for historical, statistical or research purposes. This will be subject to us establishing appropriate safeguards (which can include de-identifying the records) against the records being used for any other purpose;
- Unfortunately, the transmission of information via the internet is not completely secure. We will use appropriate and reasonable technical and organisational measurements to protect the information, we cannot however guarantee the security of your data transmitted to our Site or to any other location by electronic means. Any transmission is at your own risk. However, once we have received the information, we will use appropriate and reasonable technical organisational measurements to try and prevent unauthorised access.

10. Sharing of your personal information:

- We will not disclose any of your personal information to any person, except when we have your consent and/or permission to do so or where we are required to do so in terms of law or if same is in your best interest;
- You agree that your personal information may be shared: -
    - to our holding companies, subsidiary companies, agents, advisers, partners, service providers and suppliers, or in the event of a change control if the ownership or control of all or a part of our Products/Services changes, we may transfer your information to such new owner.
    - where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a

party who may be in breach of the terms or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities, or where the disclosure of your personal information would be in your best interest.

11. Your rights:

- You have the right to, in accordance with these terms, request that we correct, destroy or delete any of your personal information that we have processed on our Products/Services and/or our Site. The personal information that you may request us to correct, destroy or delete is personal information that has been processed in accordance with these terms that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.

- You have the right to withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that the withdrawal of your consent does not affect the processing of your personal information before the withdrawal of your consent; or that the withdrawal of your consent does not affect the processing of your personal information if the processing is in compliance with an obligation imposed by law on us; or that the withdrawal of your consent does not affect the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body; or that the withdrawal of your consent does not affect the processing of your personal information as required by law; or that the withdrawal of your consent does not affect the processing of your personal information as required to finalise the performance of a contract in which you are a party; or that the withdrawal of your consent does not affect the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.

- You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests, our legitimate interests or the legitimate interests of a third party the information is supplied to.

- You have the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.

- You have the right to not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in accordance with these terms. The Information Regulator's contact details are published by the government from time to time in terms of POPIA. When they are published POPIA places a duty on us to inform you what those contact details are and we will do so via our Products/Services and/or our Site.\You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with these terms.

12. Use of cookies:

- Cookies are pieces of information our Products/Services and/or our Site transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving you preferences and, tracking your online habits, traffic patterns, and making sure that you does not see the same advertisement too often. The use of cookies is an industry standard.
- We may place a "cookie" on your browser to store and sometimes track information about you.
- While most browsers are initially set up to accept cookies, you can reset the data's subject's browser to refuse all cookies or indicate when a cookie is being sent. Please note that some parts of our Products/Services and/or our Site will not function properly if you refuse cookies.

13. Links to other Sites:

When you use our Products/Services and/or our Site, you could be directed to other site/s that are beyond our control. These other site/s may send their own cookies to you, collect data or solicit personal information. We do not control the privacy policies of those third party and we cannot be held liable for the use thereof by you for any reason whatsoever.

14. Direct Marketing:

- We may process your personal information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.
- If you currently receive marketing information from us which you would prefer not to receive in the future please email us at [insert] or alternatively, unsubscribe using the unsubscribe function when receiving marketing communication from us.

15. Passwords and login information:

- You may register your personal information with us via e-mail or via our Site, or manually or as may be otherwise communicated to you from time to time.
- If you register your personal information, you will be able to create your own user name and password.
- You must not provide your username or password to anyone. You are solely responsible for keeping your username or password secret.
- You are solely responsible for any loss you may suffer should any other person use your username or password.

16. Contact Details:

- You may contact us at -
- The Information Officer:
- Brisk Solutions (Pty) Ltd

Hangar 6

Rand Airport

Germiston

1419

- Attention: Mr Ian Webster
- Contact Number: 011 827 5503
- Email address: ian@henleyair.co.za