
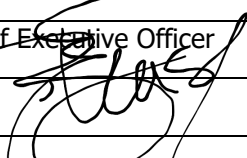


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PROTECTION OF PRIVATE INFORMATION PRIVACY POLICY

POPI-POL-001

	Reviewed	Approved
Name:	P Marrie	B.E. Nash
Designation:	Information Officer	Chief Executive Officer
Signature:		
Date:	31 May 2021	31 May 2021

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PROTECTION OF PRIVATE INFORMATION - PRIVACY POLICY

This Policy document explains how Dartcom SA (Pty) Ltd and its business entities (Herein after referred to as Dartcom) obtain, use, store, disclose and dispose your personal information, in accordance with the requirements of the Protection of Personal Information Act (Herein after referred to as "POPIA").

Dartcom understand the importance of protecting your personal data and this policy therefore applies to personal data that we collect from you during your interactions with us, whether online, including through our websites (including mobile sites) and social media sites ("Sites"), mobile applications ("Apps") (collectively "Online Services") that link to our Privacy Statement and Policy, in writing or orally, or personal data that we may collect offline or receive from third parties.

1. Personal Information

According to the Act "**Personal Information**" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, depending on how you interact with us, personal data we collect include but are not limited to:

- your name;
- email address;
- postal address;
- telephone number;

2. Information not personally identifying you as an individual

We may also collect other information that does not personally identify you. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, primary language, and information collected through cookies and other technologies or information that has been anonymised or aggregated. If we link this information with your personal data, we will treat that linked information as personal data.

You may choose not to provide personal data to us when requested. However, should it be necessary to provide you with our solutions and services, access to our online services, or to perform administrative functions, we may be unable to do so without the required information.

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3. Sensitive Personal Data

We may collect sensitive personal data about you, e.g. information relating to your health, religion, race, gender, disability or sexual orientation. This information will only be gathered when required for the purposes of providing our services to accommodate you.

4. How we collect your data

We may collect your personal data from you in a variety of ways when you interact with us, including:

- When you access our Online Services, or interact with us in any other way, or use our solutions and services.

We collect personal data when you place orders for our solutions and services, you create an account with us, we process your orders and payment transactions, perform administrative and business functions, market our solutions and services to you and when you register for our events, workshops and seminars or subscribe to our mailing lists and newsletters.

- When you communicate with us.

We collect personal data when we respond to your inquiries and requests, obtain feedback from you about our solutions and services or you apply for employment with us.

- From third party sources.

We collect personal data from third parties, including public databases, social media sites, business partners with whom we offer co-branded services or engage in joint marketing activities and third parties that provide list enhancement or similar services.

When you use our Online Services, we may, and third parties we engage may automatically collect data, including personal data through use of cookies. For more information, see the "Cookies Statement" section below.

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5. Legal basis for processing your personal data

When we process your personal data in connection with the purposes set out in this document, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:

- Our legitimate interests (or those of a third party with whom we share your personal data) for the purpose of managing, operating or promoting our business, including direct marketing, and
- Dartcom transfers of personal data for business and administrative purposes, except where such interests are overridden by your interests or fundamental rights or freedoms which require protection of personal data.
- Where this is necessary to comply with a legal obligation on us.
- To protect the vital interests of any individual.
- Where you have consented.

6. Use of your personal data

We may use your personal data to:

- Enable you to effectively use and to improve our solution and services.
- Perform administrative and business functions and internal reporting.
- Send administrative information to you.
- Obtain feedback from you about our services and solutions including through client satisfaction surveys, in which event, we will only use your personal data for the sole purpose of sending you a survey via email.
- Respond to your inquiries and fulfil requests by you.
- Assess the performance of our Online Services and to improve their operation.
- Inform you about and provide you with our services and solutions.
- Update our records and keep contact details up to date.

We engage in these activities to manage our contractual relationship with you, to comply with our legal obligations, or for our legitimate business interests.

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7. Sharing your personal data

We may share your personal data for the purposes set out in this policy (as applicable):

- With our affiliates and subsidiaries for the purposes set out in this policy. Dartcom is the party responsible for the management of jointly used personal data.
- With business partners with whom we offer co-branded services or engage in joint marketing activities.
- With service providers to provide operational services or facilitate transactions on our behalf, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, client support, email delivery, data analytics and auditing.
- Where you consent to the sharing of your personal data.
- In connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- For other legal reasons.

We may share your personal data in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process;

- Where necessary to comply with judicial proceedings, court orders or government orders; or
- To protect the rights, property or safety of Dartcom, its business partners, you, or others, or as otherwise required by applicable law.

Any third parties with whom we share personal data are contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

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8. Security of your personal data

Dartcom is committed to protecting your personal data from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal data do the same.

9. Cross border transfers

As a company with a cross border footprint, Dartcom may transfer your personal data to countries where we do business or to international organisations in connection with the purposes identified above and in accordance with this Privacy Policy.

10. Cookies

When you access our Online Services such as website, online shopping, we use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage. We use cookies to assist us with activities such as:

- Enabling you to sign in to our Online Services
- Authenticating you
- Keeping track of information you have provided to us
- Improving your browsing experience
- Customising our interactions with you
- Storing and managing your preferences and settings
- Compiling statistical data
- Analysing the performance and usability of our Online Services
- Measuring traffic patterns for our Online Services; and
- Determining which areas of our Online Services have been visited.

These technologies collect information that your browser sends to our Online Services including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

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Our Online Services may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your activities across our Online Services to help us compile aggregated statistics.

11. Links to third party sites and applications

Our Online Services may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third party websites and applications. Your use of such sites and applications is subject to the applicable third party privacy policy and is at your own risk.

12. Direct marketing

We do not provide your personal data to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal data commercially available to any third party.

13. Retaining your personal data

We will retain your personal data for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain personal data, or as part of an investigation or for litigation purposes
- Personal data is needed to maintain accurate business and financial records
- There are automated means to enable you to access and delete your personal data at any time;
- The personal data is sensitive personal data in which event we will generally retain this for a shorter period of time;
- You have consented to us retaining your personal data for a longer retention period, in which case, we will retain personal data in line with your consent.

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14. Updates to this privacy policy

We may update this policy at any time. If we do, we will update the "last modified" section at the top of this Privacy policy.

We encourage you to regularly review this policy to stay informed about our privacy practices.

15. How to contact us

If you have any questions about how your personal data is handled by the company, you have a privacy concern or you wish to make a request or a complaint relating to your personal data, please contact our Information Officer -