

*Please read the following Privacy Policy carefully as it explains how your data is collected and used.*

## **PROTECTION OF PERSONAL INFORMATION ACT POLICY**

### **INTRODUCTION**

We are committed to compliance with The Protection of Personal Information (POPI) Act 4 of 2013 and will always:

1. Sufficiently inform Data Subjects (hereafter referred to as “Member/s”), the specific purpose for which we will collect and process their personal information;
2. Protect Personal Information from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimise business damage and maximise business opportunities.

This Policy establishes measures, processes and standards for the protection and lawful processing of personal information.

The **Information Officer**, Clinton Gaffney, is responsible for:

- The monitoring of this policy;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.

### **DATA COLLECTION**

#### **How We Collect Information**

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide us when you:

- Register to use our services. This may include your name, address, email address, ID number and mobile number. We may also ask you to provide additional information about yourself and your preferences;
- Complete online forms (including call-back requests), take part in surveys, download any information, or participate in any other interactive areas that appear on our website or within our application or service
- Interact with us using social media
- Provide your contact details to us when accessing or registering to use any websites, applications, or services we make available, or when you update those details
- Contact us offline, for example, by telephone, fax, SMS, email, or post

## What We Do with Your Information

When you interact with our site, as part of the online communication process, we collect the personal information you give us such as your name, phone number, and email address.

When you browse our site, we may also automatically receive and store certain personally non-identifiable information (“Log Data”). This Log Data includes your computer’s internet protocol (IP) address, browser type or the domain from which you are visiting, the site pages you visit, the search terms you use, and any advertisements on which you click.

This is information that helps us learn about your browser and operating system. For most users accessing the Internet from an Internet service provider, the IP address will be different every time you log on. We use Log Data to provide you with the services and pool it with other information to monitor the use of the services, and for the technical administration of the services.

We do not associate your IP address with any other Personal Information to identify you personally, except in cases where we are asked to comply with a subpoena or other legal demand or where we suspect that there has been a violation of our policies, our Terms of Service and/or applicable law.

Email marketing (if applicable): With your permission, we may send you emails about our site, new products or services, our company, and other updates.

To the extent permissible under applicable law, we use your information to:

- Provide any information and services that you have requested
- Manage our relationship with you (e.g.: via customer services and support activities)
- Monitor, measure, improve, and protect our content, website, applications and services, and provide an enhanced, personal, user experience for you
- Undertake internal testing of our website, applications, systems and services to improve their security and performance. In these circumstances, we anonymise any information used.
- Provide you with any information that we are required to send you to comply with our regulatory or legal obligations
- Detect, prevent, investigate, or remediate crime, illegal, or prohibited activities, or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes)
- Contact you to find out if you would like to take part in any of our further customer research (e.g.: feedback on your use of our applications, products, and services)
- To monitor, carry out statistical analysis and benchmarking, provided that in such circumstances, it is on an aggregated basis, which will not be linked back to you or any living individual
- Deliver targeted advertising, marketing (including in-product messaging), or information to you, which may be useful to you, based on your use of our applications and services
- Deliver joint content and services with third parties with whom you have a separate relationship (e.g.: social media providers)
- Provide you with location-based services (e.g.: advertising and other personalised content), where we collect geo-location data

## **CONSENT**

### **How We Get Your Consent**

When you provide us with personal information via one of our online touch points (such as a web form or social lead), you consent to our collecting it and using it only for the reason for which you sent us your information.

Where we ask for your personal information for a secondary reason, like marketing or research, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

### **How to Withdraw Your Consent**

If you change your mind after you have opted in, you may withdraw your consent for us to contact you, collect more information, use, or disclose your information, at any time, by contacting us at:

LifeTags

Tel: 082 763 4933

Email: [info@lifetags.co.za](mailto:info@lifetags.co.za)

## **DISCLOSURE**

We may disclose your personal information if we are required to do so by law or if you violate our general terms and conditions.

## **POLICY PRINCIPLES**

### **Accountability for Data to be collected**

- We shall take reasonable steps to safeguard all Data and Personal Information collected from you

### **Processing Limitation/Purpose for Data Collection**

- We will collect personal information directly from you
- Once in our possession we will only process or further process your information with your consent, except where we are required to do so by law. In the latter case we will always inform you

### **Limitation on Further Processing**

- Personal information may not be further processed in a way that is incompatible with the initial purpose for which it was collected and will only be done with your express consent

## DATA SECURITY SAFEGUARDS

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed.

We keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. We do our best to protect your personal information, but we cannot guarantee the security of your information if it is transmitted to our website, applications, or services, or to other websites, applications, and services, via an internet or similar connection.

We are committed to ensuring that information is only used for legitimate purposes with member/s consent and only by authorised employees of our agency.

## COOKIES

Cookies are small text files that are transferred from our websites, applications, or services and stored on your device. We use cookies to provide you with a more personalised service and to help make our websites, applications, and services better for you.

Our cookies may be:

- **Session cookies:** temporary cookies that identify and track users within our websites, applications, or services and are deleted when you close your browser or leave your session in the application or service, or

We use the following types of cookies:

### Strictly Necessary Cookies

These are cookies that are needed for our websites, applications, or services to function properly.

### Performance Cookies & Analytics Technologies

These cookies collect information about how visitors and users use our websites, applications, and services. For instance, it can gather information about which functionality visitors use most often, and if they get error messages from areas of the websites, applications, or services.

These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications, and services work.

### Functionality Cookies

These cookies allow our websites, applications, and services to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personalised features. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

## **Targeting or Advertising Cookies**

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission.

They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often, targeting or advertising cookies will be linked to site functionality provided by the other organisation.

## **Web Beacons & Parameter Tracking**

We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails. These web beacons collect limited information and does not identify particular individuals.

It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and / or disclose it.

## **QUESTIONS & CONTACT INFORMATION AROUND OUR PRIVACY POLICY**

If you would like to access, correct, amend, or delete any personal information we have about you, register a complaint, or simply want more information, contact our Privacy department as follows:

### **Privacy Policy Department**

082 763 4933, info@lifetags.co.za, (Mon-Fri) 08:00 – 16:00

## **PARTICIPATION OF INDIVIDUALS/COMPLAINTS**

- Members are entitled access to, and to correct any information held by us.
- Complaints should be submitted in writing to the Information Officer for Resolution.
- Requests to Access, Correct or Delete information must be made on the attached *Annexures 1 and 2* and submitted to the Information Officer.

# Annexure 1

## OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

### Notes:

1. Affidavits or other documentary evidence in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

### DETAILS OF DATA SUBJECT

Name(s) and surname of data subject:  
Unique Identifier/ Identity Number  
Residential, postal or business address:  
Contact number(s):  
E-mail address:

### DETAILS OF RESPONSIBLE PARTY

Name /Registered name of responsible party:  
Residential, postal or business address:  
Contact number(s):  
E-mail address:

### REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)

Please provide detailed reasons for the objection below:

Signed at ..... this ..... day of .....20.....

.....  
Signature of data subject/designated person

## Annexure 2

### REQUEST FOR ACCESS TO/CORRECTION/DELETION OF PERSONAL INFORMATION OR DESTROYING/DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE POPI ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS, 2018 [Regulation 3]

**Notes:**

1. Affidavits or other documentary evidence in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate request box with an X

Access to/Correction or deletion of personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

#### DETAILS OF DATA SUBJECT

Name(s) and surname of data subject:  
Unique Identifier/ Identity Number:  
Residential, postal or business address:  
Contact number(s):  
E-mail address:

#### DETAILS OF RESPONSIBLE PARTY

Name /Registered name of responsible party:  
Residential, postal or business address:  
Contact number(s):  
E-mail address:

#### INFORMATION TO BE ACCESSED/CORRECTED/DELETED/DESTROYED (Circle applicable request)

Give description of Information:

Give detailed reasons for the request:

Signed at ..... this ..... day of .....20.....

.....  
Signature of data subject/ designated person