

## PRIVACY POLICY

### INTRODUCTION

Blue Ion Support Services (Pty) Ltd is the data controller for certain services.

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

This privacy notice sets out what personal information we collect from you when you use our website and services, how we collect your personal information, why we collect it and how we use it, and related matters.

Please read this privacy notice carefully to understand our views and practices regarding your personal information and how we will treat it and contact us if you need any clarity or assistance, using the contact details set out at the end of this policy.

This privacy policy applies to you as a customer or as a guest, namely a person who accesses or registers on our website and as a client for our services, regardless of the device which you use to access it (e.g. a computer, mobile phone, tablet etc).

### APPLICATION OF THIS PRIVACY POLICY

This privacy policy does not apply to other parties' sites, products or services, such as sites linked to, from or advertised on our site, or sites which link to or advertise our site.

### WHAT IS PERSONAL INFORMATION

Personal information refers to information about an identifiable person, such as your name and surname, gender, age, date of birth, contact details (phone number and email) and address, physical location, ID number among other identifiers.

Other information which might be "personal" information may include:

- "device and device event information": IP address, unique device identifier, the nature of the device which you used to access our site, the geographic location of your device, hardware model and settings, operating system details, browser type and version, browser language, system activity and crashes;
- "location information": We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location).

### HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information actively from you. Some areas of our site may require you to submit certain information in order for you to find out about our services such as when you contact us on our website to request to receive any information or similar services.

If you contact us, we may keep a record of that correspondence.

Our site may also collect personal information from you by asking you specific questions and by permitting you to communicate directly with us, for example via e-mail.

In these situations, we will:

- ask you for specific information;
- inform you at each information point what information is required and what information is optional; and
- indicate the consequences if you don't give us the relevant information. (You will generally need to provide us with the relevant information in order to take full advantage of our services.)

The information we may actively collect from you may include your:

- identifying information (e.g. your name, surname, and physical location);
- contact details (e.g. e-mail address and phone number).

### **WHY WE COLLECT YOUR PERSONAL INFORMATION AND HOW WE USE IT**

We use the information we collect to provide, maintain, and improve our services and to protect us, our services and our customers.

We may collect and use your personal information to:

- establish and verify your identity;
- to create your user account and allow use of our site, products and services;
- maintain and update our databases;
- communicate with you in various ways (determined by you in your privacy settings), such as e-mail, post, telephonically, SMS notifications, instant messaging or other notifications;
- keep a record of our communications with you and your communications with us;
- fulfil any contractual obligations we may have to you or any third party;
- provide you (when you become a customer) with our services;
- improve the content of our site and services;
- improve your experience and the overall quality of our services;
- inform you of facts relating to your access to and use of our website and services;

- inform you about our services which we think may interest you (if you have consented to this);
- inform you about any changes to our site, our services, our terms of use, this privacy policy or other changes which are relevant to you;
- comply with the law or with any legal process.

We will get your permission before collecting or using your personal information for any other purpose.

#### **COMPULSORY AND OPTIONAL INFORMATION**

Only the following information is compulsory: Your name, surname, address and registered e-mail address or mobile number.

All other information is optional. If you do not agree to share your compulsory information with us, then you will not be able to make full use of our services that we offer.

#### **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION**

We retain all personal information which we collect from you (except for the information referred to below) unless there is a valid technical, legal or business reason for us to delete, destroy or de-identify it (“retained information”).

We may keep all retained information for as long as you continue to access our website. If you do not access our site for a period of one (1) year we will delete, destroy or de-identify all your personal information from our records.

Notwithstanding the above, and any other provision of this privacy policy, we may keep some or all your personal information if and for as long as:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

#### **DISCLOSURE OF PERSONAL INFORMATION**

We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy notice or with your permission.

We may disclose or share your personal information to or with:

- our affiliates;

- our employees, contractors and agents if and to the extent that they need to know that information in order to process it for us and to provide services for or to us;
- in order to enforce or apply our terms of use or any other contract that comes into existence between you and us;
- in order to protect our rights, property or safety or that of our customers, employees, contractors, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;
- any third party who acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates, and our site, whether by sale, merger, acquisition or otherwise, and to any third party from whom we acquire (or propose to acquire) ownership or control of assets, shares or management, whether by purchase, merger, acquisition or otherwise;
- governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
  1. comply with the law or with any legal process;
  2. protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;
  3. detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy policy;
  4. protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

We will get your permission before disclosing your personal information to any third party for any other purpose.

## **SECURITY**

All information you provide to us is stored on our secure servers or those of our trusted partner services.

We implement appropriate, generally accepted technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, including encryption where appropriate.

Unfortunately, the transmission of information via the Internet is not completely secure. We will do our best to protect your personal information, but we cannot guarantee 100% security of your data transmitted to our servers using the internet and any transmission is at your own risk.

We take reasonable technical and organisational measures to secure the integrity of information we collect about you, using accepted technological standards to –

- prevent unauthorised access to or disclosure of your personal information; and
- protect your personal information from misuse, loss, alteration or destruction.

We create a secure back-up for operational and safety purposes.

### **YOUR RIGHTS AS A DATA SUBJECT**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access - You have the right to request a copy of the information that we hold about you. Access to this information may be subject to an administrative fee if your request is manifestly unfounded, excessive or repetitive.
- Right to rectification - You have a right to insist that we correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten - In certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing - Where certain conditions apply you have a right to restrict the processing of your data, for instance how we market to you.
- Right to data portability - You have the right to have the data we hold about you transferred to another organisation or provided to you in a machine-readable word format.
- Right to object to processing - You have the right to object or remove your consent for certain types of processing such as direct marketing.
- Right to raise a complaint - You have the right to complain if you have cause to be concerned about the way we capture, treat or process your personal information.

## **EXERCISE YOUR RIGHTS**

This privacy policy gives effect to many of our responsibilities as a responsible party or a data controller in terms of the applicable legislation in the respective countries where we operate.

If you have a concern about the manner in which we are handling your information, for example if you feel we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;
- are misusing of your personal information;
- are keeping personal information about you for longer than is necessary;
- hold inaccurate personal information about you;
- have disclosed personal information about you;
- have collected personal information for one reason and is using it for something else; or
- have accessed your personal information without your authorization;

and if you have any queries or questions regarding your personal information or how we process it, or should you wish to request access to information or records owned by us, please contact our appointed Information Officer to log a query (see contact details under the below section entitled “INFORMATION OFFICER AND CONTACT DETAILS”). The email address is actively monitored, and we endeavour to respond to all requests within 1 month.

- If possible, please supply all or any of the following information in order to assist us in the process:
  - Full name of the person lodging the compliant
  - Contact details such as email address and telephone number
  - How the personal data was collected (if known)
  - All necessary information (such as your account number and what you think we have done wrong)
  - The timeframe over which the suspected wrongdoing occurred (if known)
  - Any evidence in support of the complaint.

## **CHANGES TO THIS POLICY**

We may change this privacy notice from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy notice (including, if we have your e mail address, e-mailing you notifications of the updated privacy notice).

Privacy Notice Version: Version 1

Effective Date: 1 July 2021

## **INFORMATION OFFICER AND CONTACT DETAILS**

Protection of Personal Information Act 4 of 2013 contact:

The appointed Information Officer is VIMAL RAMDHUNEE

Email address – [vimal@blueionbx.com](mailto:vimal@blueionbx.com)

Phone: 011- 275 6000

Address: Corner Main Office Park, Unit 25, 2 Payne Road

Bryanston, 2021

Postal address: Postnet Suite 425

Private Bag X21

Bryanston, 2021

## **CONTACT THE SOUTH AFRICAN INFORMATION REGULATOR**

While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our Information Officer will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken. If you remain unhappy after the process you may forward your complaint to the Information Regulator:

[inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

or

the Information Regulator (South Africa):

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

More information can be found at <https://justice.gov.za/inforeg/index.html>