



kaelo

Privacy Policy

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Privacy Policy

Introduction

Welcome to our privacy policy. We are Kaelo (Pty) Ltd (Registration number 2004/009584/07) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (*personal information*).

Audience

This policy applies to you if you are:

- a visitor to our website;
- a user of our social media and electronic platforms,
- a learner, an employee, contractor, service provider or a third party; or
- a client who requests or uses the products or services that we provide.

This policy also applies:

- if you contact us in any manner including email.

Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

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.

Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

Special personal information

Depending on the products or services that you require, we may also collect special personal information including your:

- **financial information** – such as your bank account details;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **sexual information** – such as information about your sex life or sexual orientation;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** – including your membership of a trade union; and
- **beliefs** – including your political or religious beliefs.

Acceptance

Acceptance required

You must accept all the terms of this policy when you:



- use or request our products or services,
- use our website and URLs, any sites housed under its domain names,
- use our social media platforms,
- send or receive emails from us.

If you do not agree with anything in this policy, then you may not:

- use or request our products or services,
- use our website and URLs, any sites housed under its domain names,
- use our social media platforms,
- send or receive emails from us.

Legal capacity

You may not access our website or social media platforms, use or request our products or services if you are younger than 18 years old or do not have the 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. If you are a data subject that is under the age of 18, we will process your personal information only if a competent person (e.g. your parent or legal guardian) gives the required consent or permission for the processing.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you 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 emailing us, using our website or social media platforms, or our products or services. If you continue to email us, use our website or social media platforms, or our products 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.



Collection

On registration

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, company registration number, and VAT number;
- your postal address or street address; and
- your username and password.

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

Use or request

When you use our social media platforms or use or request products or services from us, you will be asked to provide us with additional information on a voluntary basis (**product or service 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.

Social media

We use social plug-ins from social networks such as Facebook, YouTube, LinkedIn, Google and Twitter. We have no influence on or control over the extent of the data retrieved by the social



networks' interfaces and we can accordingly not be held responsible or liable for any processing or use of personal information transmitted via these social plug-ins. For information on the purpose and extent of the data retrieval by the social network concerned, and the rights and settings possibilities for the protection of your private sphere, please refer to the data protection information provided by the social network in question.

Cookies

For information on how we deal with cookies, please refer to our Cookies Policy.

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 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 that you decide to upload or download from our website or social media platforms, or when you enter competitions, take advantage of promotions, respond to surveys, contact us, request certain additional products or services, or otherwise use the features and functionality of our website.

Recording calls

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

Purpose for collection

We may use or process any product or service 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 or services purposes*** – such as managing requests for and providing our products or services, and improving the quality of our products and services;
- ***marketing purposes*** – such as pursuing lawful related marketing activities;
- ***verification purposes*** – to identify or verify who you are and your details;
- ***employment purposes*** – to manage employee applications;



- **administration purposes** – to manage any information you provide to us, and for general administration purposes;
- **business purposes** – such as internal audit, accounting, business planning, disposals of business, or other proposed and actual transactions;
- **security purposes** – to detect and prevent fraud and money laundering;
- **financial purposes** – to recover unpaid fees or other amounts due to us, or for debt collection;
- **analysis purposes** – such as research, analytics, and statistics, or carrying out analysis of customer profiling; and
- **legal or contractual purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage 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.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

Use

Our obligations

We may use your personal information to fulfill 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 goods or services in which we think you may be interested. This means that in some cases, we may also send you promotional messages. We



will not send you promotional messages unless you have chosen to opt-in to them. But we may send you one message prompting you to opt-into promotional messages.

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 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 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.

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;
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our service providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, and technology services (our contracts dictate that these service providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- carefully selected business partners who provide products and services which may be of benefit to you which will only be done on a need-to-know basis;
- credit bureaus to report account information, as permitted by law;
- banking partners as required by the relevant rules; 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 audits.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to prevent fraud, loss, bribery or corruption and where we are using another agent or service provider under a mandate to provide such service and under all of the abovementioned circumstances, where we will take reasonable measures to ensure that such personal information is only provided to the recipient if such recipient undertakes to keep the information confidential and secure;
- to protect the safety of any individual or the general public; and
- to prevent violation of our terms.

No selling

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

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. We authorise access to personal information only for those employees who require it to fulfill their job responsibilities.

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.



Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. We have implemented the appropriate technical and organisational security measures which are required in order to protect all personal information we hold, against unauthorised access, accidental or wilful manipulation, loss or destruction.

Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

You may contact our Information Officer at compliance@kaelo.co.za should you have any questions, complaints, or objections to the processing of your personal information, or if you wish to exercise any of your data protection rights in general.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. We will ensure that before we do so, the recipient of the personal information agrees to be bound by the data transfer requirements in POPIA.



Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu on any of the pages on our website or contacting us by phone or email.

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

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 Customer Contact Centre at compliance@kaelo.co.za or on 0861 493 587.