



**SAFE CLOUD™ PRIVACY
POLICY – POPIA COMPLIANCE**

JULY 2021





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SAFE CLOUD™ (we"/"us") are committed to protecting and respecting any personal information you share with us. This statement applies to Personal Information provided to SAFE CLOUD™ and its affiliates This is in compliance with the South Africa's Protection of Personal Information Act Section 18 (Jul 2021).

1. PRIVACY STATEMENT

SAFE CLOUD™ (we"/"us") are committed to protecting and respecting any personal information you share with us. This statement applies to Personal Information provided to SAFE CLOUD™ and its affiliates.

In terms of the Protection of Personal Information Act (Section 18) we are required to provide you with this notification. This statement describes what types of information we collect from you or which we may collect from third parties, how it is used by us, how we share data with others, how you can manage the information we hold and how you can contact us. The information below describes processing of your personal information which we obtain through a variety of different interactions, including when you visit our websites or contact us.

For the purposes of data protection laws, we are a Responsible Party, responsible for your personal information, which means we decide why and how it is processed. It also means we are responsible for that processing, which extends to those of our service providers who process your information based on our instructions. Where that information is collected and sent to other organisations for processing that is in both our and their interests, we will be making decisions together in relation to that particular processing and will be jointly responsible with the organisations involved. We and the other organisations involved in making these decisions will be jointly responsible to you in terms of the Protection of Personal Information Act for this processing. In other circumstances, the organisation receiving your information will be separately responsible to you and use your personal information in the ways described in its privacy statement (and not ours).

You will always have the option not to receive marketing communication from us. We will never send you unsolicited spam email or communications or share your data with anyone else who might. We do not sell your information to third parties.



The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us.

1.1 WHAT INFORMATION DO WE COLLECT?

We collect information about you and your institution when you engage with our website. We only collect information, which is necessary, relevant and adequate for the purpose you are providing it for.

The information we collect includes some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of birth;
5. Email address;
6. The date and time you used our services;
7. The pages you visited on our website and how long you visited us for;
8. Your IP address;
9. Your GPS location (where you have permitted access to this);
10. The Internet browser and devices you are using;
11. Cookie, Pixels or Beacon information (for more information please see our Cookie Policy);
12. The website address from which you accessed our website;
13. Details of any transactions between you and us;
14. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), company details;
15. "Web chat" records;
16. Any information within correspondence you send to us including in any competition entries you submit;
17. Information we receive about you from data cleansing, enrichment and other data analytics provider's information about your race, gender in an aggregated data format and not a personalised data format.
18. Where you act on behalf of a business, any information we collect as part of business activity; and views and opinions as part of surveys
19. Any personal information that we obtain from you directly is provided to us on a voluntary basis. However, if you do not give this information to us, you may be unable to receive certain services from us or our partners or communicate with us effectively.



1.2 HOW DO WE USE THIS INFORMATION?

SAFE CLOUD™ will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communication from us (and you can withdraw your consent or object at any time). We will never send you unsolicited spam email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

1.2.1 CONSENT:

Where you have provided your consent, we may use and process your information:

To contact you from time to time about promotions, events, products, services or information which we think may be of interest to you;

We rely on our legitimate interests as the legal reason to use your information for these purposes if we collect your information from another source.

You can withdraw your consent at any time by contacting us on the details here or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

We also process personal information we obtain from optional cookies that we set on this website based on your consent. For more information, please review our [Cookie Policy](#).

1.2.2 CONTRACTUAL PERFORMANCE:

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete other transactions entered into with us.



1.2.3 LEGITIMATE INTERESTS:

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us;
2. To analyse, evaluate and improve our products and services so that your visit and use of our website, applications and customer service are more useful and enjoyable (we will generally use data amalgamated from many sources so that it doesn't identify you personally);
3. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide services that we think you will be interested in. We will only send such offers to you if you have provided your consent for us to do so;

For product development purposes;

4. To tailor the marketing information we send based on information we hold about you.
5. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);
6. To identify the extent to which your interactions and communications with us or our content contributed to your engagement with us or our brand;

Processing necessary for us to communicate with you and to assess and respond to complaints, claims and regulators

7. To communicate with you (including through social media) including to respond to queries, complaints or claims and to manage legal and regulatory requests and requirements;
8. To enforce or protect our legal rights or to establish, bring or defend legal claims;

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

9. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer. We may use information about you from third party data providers for this purpose, including verification and data cleansing service



providers that provide the latest home address, contact number or e-mail address for you;

10. To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
11. To inform you of updates to our terms and conditions and policies;
12. For cookies that are essential for our website to function properly. Please see our Cookie Policy for further information.

1.2.4 LEGAL OBLIGATION:

We may process your personal information to comply with our legal or regulatory requirements (for example to assist, or respond to a request for information from, an authorised authority, regulatory body or court, or to respond to a court order). These requirements include processing to remember your cookie consent preferences for optional cookies used by our website. Please see our Cookie Policy for further information.

1.2.5 VITAL INTEREST:

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

1.3 HOW DO WE SHARE INFORMATION?

We do not sell your information to third parties.

1.3.1 SHARING FOR LEGAL REASONS:

We will also share your personal information if we have a duty to do so, e.g., to assist an authorised authority, regulatory body or court, or to enforce or protect our legal rights or to establish, bring or defend legal claims.



1.3.2 COOKIES:

We may make use of various social media platforms to further engage with you from time to time. We use cookies and similar technologies in our websites and applications to collect and send information to Facebook and LinkedIn about actions you take on our website and applications.

1.3.3 SAFEGUARDS:

We take reasonable steps to ensure that any third-party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated nonspecific data sets wherever possible.

1.4 HOW LONG DO WE KEEP INFORMATION FOR?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us, we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

If we have a relationship with you (e.g., you are a customer), we hold your personal information for 16 years from the date our relationship ends. We hold your personal information after our relationship ends as required by other regulatory requirements. Our relationship may end for several reasons.

Where you have consented to receive marketing, regardless of whether or not we have a relationship with you, we will retain information we need to market to you until such time as you opt out or unsubscribe from receiving marketing information.

We hold your personal information for the above periods to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:



- The law requires us to hold your personal information for a longer period, or de-identify or delete it sooner;
- Where you have raised a legal claim, complaint or concern regarding a service offered by us.

1.5 HOW CAN YOU MANAGE THE INFORMATION WE HOLD ABOUT YOU?

You have the right as an individual to access your personal information we hold about you and make corrections if necessary and the right to object to the processing of your personal information. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

1. Ask for a copy of the information that we hold about you;
2. Correct and update your information;
3. Withdraw your consent (where we rely on it). Please see further How do we use this information;
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
6. Transfer your information in a structured data file (in a commonly used and machine-readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us using the details below:



Contact details of the Responsible Party.

SAFE CLOUD™: 072 145 3152

E-mail: admin@safecLOUDsa.co.za

Postal address: 21 Castle Sands, 522 Lois Ave, Erasmuskloof, Pretoria, South Africa, 0181

Physical address: 278 21 Castle Sands, 522 Lois Ave, Erasmuskloof, Pretoria, South Africa, 0181

If you have any specific data protection concerns or a complaint, you can address it to admin@safecLOUDsa.co.za

If you are unhappy, you have the right to lodge a complaint with the Information Regulator. The contact details for the Information Regulator:

Contact Details:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: infoereg@justice.gov.za.

COOKIE POLICY

We use cookies to improve your experience on our website. These cookies provide a better performance, enhance features and enable certain functionality. Our [cookie policy](#) explains more about cookies and you can change your settings at any time. By continuing to use our website you are agreeing to our use of cookies.