



PRIVACY POLICY

DEFINITIONS

1. Anonymous Information - information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual user.
2. Application - a program or service operated by **Spies & Associates** (or on our behalf) that may be displayed on various online, mobile, or other platforms and environments, including those operated by third parties, which permits **Spies & Associates** to interact directly with our users.
3. Children - refers to individuals under 18 years of age.
4. Data Controller - is **Spies & Associates** and any of its subsidiaries or affiliates that is responsible for the personal information collected.
5. Data Processor - is a person or entity that processes personal information on behalf of a data controller (or data controllers) and is permitted to perform data processing only as directed by the data controller(s).
6. IP Address - is associated with the access point through which you enter the Internet and is typically controlled by your Internet Service Provider (ISP) or your company. **Spies & Associates** may use IP addresses to collect information regarding the frequency with which users visit various parts of its sites and applications, and **Spies & Associates** may combine IP addresses with personal information.
7. Parents - means a parent or legal guardian.
8. Personal Information - means information that identifies (whether directly or indirectly) a particular individual, such as the individual's name, postal address, email address, and telephone number. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as personal information.
9. Public Forums – **Spies & Associates** applications may offer message boards, conversation pages, blogs, chat rooms, social community environments, profile pages, and other forums that do not have a restricted audience. If you provide personal information when you use any of these platforms, such personal information may be publicly posted and otherwise disclosed without limitation as to its use by **Spies & Associates** or by a third party.



INTRODUCTION

Spies & Associates is committed to safeguarding the privacy of our website visitors and users.

This policy applies where **Spies & Associates** is acting as a data controller with respect to your personal data.

Spies & Associates uses cookies on their website. Insofar as these cookies are not strictly necessary for the provision of **Spies & Associates** website and/or services, **Spies & Associates** will ask you to consent to its use of such cookies when you first visit its website.

In this policy, "we"; "us"; "our" and "**Spies & Associates** " refers to **Spies & Associates** and any of its subsidiaries or affiliates (hereinafter referred to as "we"; "us" or "**Spies & Associates**").

Where use of the website is subject to the Protection of Personal Information Act of 2013 (POPIA) or where any references to POPIA are made in terms of this Disclaimer, then conformance with the Act shall be limited to **Spies & Associates** or otherwise as determined by POPIA.

SCOPE OF THIS POLICY

This **Spies & Associates** Privacy Policy describes the treatment of personal information provided or collected on the sites and applications where this privacy policy is posted, whether on our digital properties or on applications we make available to/on third-party sites or platforms. We follow this Privacy Policy in accordance with national law of the Republic of South Africa, as the location in which we have our registered office and principal place of business. In some cases, we may provide additional Data Privacy Notices specific to certain products, practices, or regions. These terms and conditions are to be read in conjunction with this policy.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), the information you provide may be separately collected by the third-party.



The information we collect is covered by this Privacy Policy, and the information the third- party site or platform collects is subject to the third-party site or that platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of personal information we have collected directly through our applications (**Spies & Associates**).

Please also keep in mind that our sites and applications may contain links to other sites not owned or controlled by Spies & Associates and we are not responsible, nor can we be held liable, for the privacy practices of those sites.

We encourage you to be aware when you leave our sites or applications to read the Privacy Policies of other sites that may collect your personal information.

TYPES OF INFORMATION WE COLLECT

Spies & Associates collects the following basic types of information

- personal information and anonymous information – and we may use personal and anonymous information to create a third type of information, aggregate information. For example, **Spies & Associates** collects:
- registration information - information you provide us with when you request information or a quote or proposal, request to be contacted via a contact form, or link your profile to a third-party site or platform with your registration accounts, such as your first name and surname, company, city and country of residence or work, date of birth, email address, phone number(s) username, and password;
- transaction information - information you provide us with when you request more information, contact or purchase a product or service from **Spies & Associates**, such as your postal address, order and payment information;
- information you provide in public forums on our sites and applications, such as your public posts;
- information sent either one-to-one or within a limited group using messages, chat, post, or similar functionalities, where **Spies & Associates** are permitted by the applicable law to collect this information;
- information **Spies & Associates** obtains from a third party, such as a site or platform provider, about the use of our applications on third- party platforms or devices;



- location information - information provided by a mobile device or other device interacting with one of our sites or applications (including through beacon technologies), or associated with your IP address, where **Spies & Associates** are permitted by law to process this information;
- activity information about your use, and the use by any person(s) you authorise through your account, of our sites and applications, such as the content you view or post, how often you use services from **Spies & Associates**, and your preferences; and
- use or view device data when you visit **Spies & Associates** sites, use our applications on third-party sites or platforms, or open emails **Spies & Associates** send, including your browser or device identifier, and IP addresses.

HOW SPIES & ASSOCIATES COLLECTS YOUR INFORMATION

Spies & Associates collects information you provide to us when you request or purchase products, services, or information from us, register with us (including when you link your profile on a third-party site or platform with your registration account), participate in public forums or other activities on our sites and applications, respond to guest surveys, or otherwise interact with us using one or more devices.

Spies & Associates collects information through a variety of technologies, such as cookies, analytics tools, Flash, pixels, and web beacons.

You consent to **Spies & Associates** acquiring information from other trusted sources to update or supplement the information you provided or **Spies & Associates** collected automatically, such as when we validate postal address information. Applicable laws may require that you authorise the third party to share your information with **Spies & Associates** before we can acquire it.

USE OF YOUR INFORMATION BY SPIES & ASSOCIATES

- **Spies & Associates** may process data about your use of its website and services (usage data). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This usage data may be processed for the purposes of analysing the use of the website and services.
- **Spies & Associates** may process account data, which may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.



- **Spies & Associates** may process your personal data that is provided in the course of the use of our services (service data). The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
- **Spies & Associates** may process information contained in any enquiry you submit to us regarding goods and/or services (enquiry data). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you.
- **Spies & Associates** may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website (transaction data). The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.
- **Spies & Associates** may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (notification data). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters.
- **Spies & Associates** may process information contained in or relating to any communication that you send to us (correspondence data).

Please do not supply any additional or irrelevant personal data to **Spies & Associates** unless we prompt you to do so.

SHARING YOUR INFORMATION WITH OTHER ENTITIES

Spies & Associates will not share your personal information with a third party outside **Spies & Associates** except in limited circumstances, including:

When you allow us to share your personal information with another company, such as:

- Electing to share your personal information with carefully selected companies so that they can send you offers and promotions about their products and services;
- Directing us to share your personal information with third-party sites or platforms, such as social networking sites. Please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices.
- When companies perform services on our behalf, like package/machine delivery, marketing and advertising, and customer service; however, these companies are prohibited from using your personal information for purposes other than those requested by **Spies & Associates** or required by law;
- When we share your personal information with third parties in connection with the sale of a business, to enforce our Terms and Conditions, to ensure the safety and security of our



guests and third parties, to protect our rights and property and the rights and property of our guests and third parties, to comply with legal process, or in other cases if we believe in good faith that disclosure is required by law.

DATA SECURITY, INTEGRITY, AND RETENTION

The security, integrity, and confidentiality of your information are extremely important to **Spies & Associates**. We have implemented technical, administrative, and physical security measures that are designed to protect user information from unauthorised access, disclosure, use, and modification. We regularly review and update our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable.

You consent to **Spies & Associates** retaining all your personal information for a period of seven years after:

1. termination of our contractual relationship;
2. your last electronic or telephonic communication with us; and/or
3. your last electronic or telephonic transaction with us.

YOUR RIGHTS

In this section, we summarise the rights that you have under South African data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.



Your principal rights under the data protection law are:

1. the right to access your personal data that **Spies & Associates** has gathered
2. the right to object to processing – this objection must be provided **Spies & Associates** in writing. If you have objected to processing, pending the verification of the objection, some data may still be processed. Where processing has been restricted on this basis, **Spies & Associates** may continue to store your personal data. However, **Spies & Associates** will only otherwise process it: with your consent for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest;
3. the right to data portability;
4. the right to complain to the Regulator;
5. the right to withdraw consent ;
6. the right to have any inaccurate personal data about you rectified;
7. the right to restrict the processing of your personal data when:
 - you contest the accuracy of the personal data, or processing is unlawful;
8. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us, or the purposes of the legitimate interests pursued by us or by a third part. If you make such an objection we will cease to process the personal information, provided the objection was made in writing and acknowledged by **Spies & Associates**, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the **Spies & Associates** information officer who is responsible for data protection.

To the extent that the legal basis for **Spies & Associates** processing of your personal information is consent, you have the right to withdraw your consent at any time, provided that a notice of consent withdrawal is provided to **Spies & Associates** in writing. Withdrawal will not affect the lawfulness of processing before the withdrawal.



CHANGES TO THIS PRIVACY POLICY

From time to time, **Spies & Associates** may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. It is your obligation to check on a regular basis whether the policy has changed.

OUR DETAILS

This website is owned and operated by **Spies & Associates**. **Spies & Associates** is registered in South Africa with registered offices at **67 Voortrekker Street, Malmesbury, South Africa**.

You can contact us at:

Tel: 012 345 6789

Email: another@oldmutual.com

DATED

Last Revision April 2022