

## Privacy Policy – Fourways Airconditioning

This "**Privacy Policy**" of Fourways Airconditioning (Pty) Ltd ("**Fourways**", "**we**") regulates how we collect and use the information that we have about you and your rights in this regard. Please read this Privacy Policy carefully as it applies as soon as you use the websites, domains, information portals, and registries maintained by Fourways (the "**Website**"), including the materials made available on the Website, or the services we provide ("**Services**") or when we collect your information. It creates a legally binding agreement between us. If you do not agree with the terms of the Privacy Policy, you must discontinue using the Website or our Services. If you are dissatisfied with the Website or our Services, by all means contact us; otherwise, your only recourse is to stop using the Website and/or Services.

Your use of the Website and/or Services are regulated by this Privacy Policy and any other terms available on the Website or agreements that you enter into with us.

We may, without advance notice, modify the terms of this Privacy Policy. Your continued use of the Website and/or Services, indicates your acceptance of this Privacy Policy at the time of such use. The current version of this Privacy Policy that applies each time you visit or use our Website or Services will regulate our relationship.

The right to privacy and this Privacy Policy is important to us. We are committed to taking steps to protect your privacy when you use the Website, Services and/or materials provided by us and we implement business practices that comply with the Protection of Personal Information Act, 4 of 2013 (referred to as "**POPI**"). In this Privacy Policy, we explain how we will use and protect your Personal Information in terms of Applicable Law.

### Personal Information

Where we refer to "**Personal Information**" we mean personal information as defined in POPI, being information that may be used to directly or indirectly identify you, whether as a natural or juristic person. Personal Information includes, for example, your name, surname, email address, identity number, contact details, photograph, banking details and location.

### Children's Privacy

Fourways is committed to protecting the privacy of children. Fourways does not intentionally collect information from or about children (persons under the age of 18), and we do not target our Website or Services to children. Fourways will only intentionally process the Personal Information of children where it is necessary for us to provide the Website or Services and with the consent of a parent or guardian of that child where required in terms of POPI.

### Links to third party websites

We may provide links to third-party websites for the convenience of our users. Fourways does not control these third-party websites and cannot represent that their policies and practices will be consistent with this Privacy Policy. If you use or rely on any links on our

Website, you do so at your own risk. We encourage you to review the privacy policies of any third party website before submitting any Personal Information.

## Collecting your Personal Information

We collect Personal Information about you from the following sources:

- directly from you when you provide it to us, such as when you sign up to use our Services or the Website, contact us or during our relationship with you;
- from public sources where you have made your Personal Information public, such as on social media;
- from your use of the Services;
- from your use of our Website or use of any features or resources available on or through our Website; and
- from third parties when you interact with them through the Website, where they are allowed to share your Personal Information or your interaction with us as a result of the Services or as required of the third parties to share it with us or otherwise if POPI allow us.

## Types of Information We Collect

### Non-Personal Information

Non-personal information is data about usage and service operation that is not directly associated with a specific personal identity. Fourways may collect and analyse non-personal information to evaluate how people use our Website.

### Aggregate Information

Fourways may gather aggregate information, being information that your computer automatically provides to us and that cannot be tied back to you as a specific individual. Examples include referral data (the websites you visited just before and just after our Website), the pages viewed, time spent on our Website, and Internet Protocol (IP) addresses. An IP address is a number that is automatically assigned to your computer whenever you access the Internet. For example, when you request a page from one of our Website, our servers log your IP address to create aggregate reports on user demographics and traffic patterns and for purposes of system administration.

### Log Files

Every time you request or download a file from our Website, Fourways may store data about these events and your IP address in a log file. Fourways may use this information to analyse trends, administer the Website, track users' movements, and gather broad demographic information for aggregate use or for other business purposes.

### Cookies

Cookies are small files about browsing activity that are stored on a device's web browser by the websites that are visited and are generally used to improve user experience. When you use our Website we automatically receive and record information on our server logs

from your browser, such as your location, IP address, general internet usage and Google Analytics information. This is statistical data about browsing actions and patterns. Cookies enable us to improve our Website and Services, estimate our audience size and usage patterns, store information about your preferences, save your password so that you don't need to re-enter it each time you use the Website, and recognise when you return to the Website.

You can set your web browser to refuse cookies or by downloading and installing the Google Analytics Opt-out Browser Add-on, but your full use of the Website or Services might be limited and you may not be able to take advantage of certain promotions we may run.

We do not link non-personal information from cookies to Personal Information without your permission.

Please note that third parties may also use cookies, but we do not have access to, or control over them, and therefore cannot take responsibility for them.

## Web Beacons

Our Website may also use web beacons to collect non-personal information about your use of our Website and the websites of selected partners, your use of special promotions or newsletters, and other activities. The information collected by web beacons allows us to statistically monitor how many people are using our Website and the websites of selected partners; how many people open our emails; and for what purposes these actions are being taken. Our web beacons are not used to track your activity outside of our Website or those of our partners. We do not link non-personal information from web beacons to Personal Information without your permission.

## Personal Information

We use Personal Information to better understand your needs and interests and to provide you with our Service. We may collect the following categories of Personal Information through our relationship with you:

- General personal details: your name and surname or similar information of a legal entity.
- Contact details: your address, contact number, and email address.
- User information: Personal Information included in correspondence, transaction documents, use of the Services or other materials that we process in the course of providing our Website and Services.
- Consent records: records of any consents you have given us in respect of using your Personal Information and any related information, such as the specific details of the consent. We will also record any withdrawals or refusals of consent.

## How We Use Your Information

We only process adequate and relevant Personal Information for the following purposes and legal bases:

- to perform in terms of our agreement with you (provide you with the Services and access to the Website, including registering for and delivering the Services and related support services);
- operate and manage your account or your relationship with us, including facilitating customer applications;
- monitor and analyse our business to ensure that it is operating properly, for financial management and for business-development purposes;
- contact you by email, push notifications or other means to inform you about our Services, including for marketing purposes, unless you have opted-out of such communications (direct marketing);
- form a view of you as an individual and to identify, develop or improve the Website and Services that may interest you;
- carry out market research and surveys, business and statistical analysis and necessary audits;
- fraud prevention;
- perform other administrative and operational tasks like testing our processes and systems; monitoring our Website's usability, performance, and effectiveness; improving the experience, usability and content of the Website and ensuring that our security measures are appropriate and adequate; and
- comply with our regulatory, legal or other obligations.

In addition to the above purposes, we may use your Personal Information for other purposes if the law allows for it, if you consent to it, or if it is in the public interest to do so. We will only process your Personal Information for purposes as allowed in terms of POPI.

## Information Sharing

Fourways does not sell, rent, or lease any Personal Information of individuals or companies, including email addresses, to anyone for marketing or other purposes, and we take commercially reasonable steps to maintain the security of the Personal Information that we hold.

We will implement reasonable measures to keep your Personal Information confidential and only share it with others in terms of this Privacy Policy, or if you consent to it, or if the law requires from us to share it. We may disclose your Personal Information to:

- our business partners or third party service providers and processors in order to provide you with access to the Website and/or Services, such as data storage service providers, third party payment processors, couriers, technicians, etc. in accordance with written agreements with these third parties;
- legal and regulatory authorities, upon their request, or for the purposes of reporting any breach of POPI or other applicable laws;
- accountants, auditors, lawyers and other external professional advisors in terms of written agreements with them;

- any relevant party to the extent necessary for the establishment, exercise or defence of legal rights, criminal offences, threats to public security, etc.;
- any relevant third party if we sell or transfer all or any portion of our business or assets;
- any relevant third party provider where our Website uses third party advertising, plugins or content; and
- any other third party service provider that will have access to your information when they provide services to us.

If we engage third parties to process your Personal Information for us (we refer to them as "operators"), the operators will only be appointed in terms of a written agreement which will require the third party operators to only process Personal Information in terms of our mandate and not for any of their own purposes, use appropriate measures to ensure the confidentiality and security of your Personal Information and comply with any other requirements set out in the agreement and required by POPI.

## International Transfers of Personal Information

Due to the nature of the Services and our business practices, we may need to transfer Personal Information to and from different countries for our business purposes and to provide the Services.

As allowed by POPI, we may transfer Personal Information to recipients in other countries, but we will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPI.

Please note that when you transfer any Personal Information directly to a third party in another country (i.e. we do not send your Personal Information to the third party), Fourways is not responsible for that transfer of Personal Information (and such transfer is not based on or protected by this Privacy Policy). Any Personal Information that we receive from a third party country will nevertheless be processed in terms of this Privacy Policy.

## Legal Rights in respect of your Personal Information

You have certain rights in relation to your Personal Information. As available and except as limited under POPI or other applicable laws, you have the following rights in respect of your Personal Information:

- right of access: the right to be informed of and request access to the Personal Information that we process about you;
- right to rectification and erasure: you may request that your Personal Information be amended or updated where it is inaccurate or incomplete or that we delete your Personal Information, subject to applicable limitations and exceptions;
- right to restrict processing: you may request that we temporarily or permanently stop processing your Personal Information;

- right to object: you may object to us processing your Personal Information, and to your Personal Information being processed for direct marketing purposes;
- right not to be subject to automated decision-making: where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may request that your Personal Information not be processed in that manner.

Where you have provided consent for us to process your Personal Information, you may also withdraw your consent where our processing is based on your consent. However, we may continue to process your Personal Information if another legal justification exists for the processing.

## Access to and Accuracy of and Objection to Processing Personal Information

**Access:** you have the right to request that we provide you with Personal Information that we hold about you. You must contact us directly via telephone or by sending us an email on [websites@itsupp.co.za](mailto:websites@itsupp.co.za).

**Quality:** we want to ensure that your Personal Information is accurate and up to date. You may ask us to correct or remove any Personal Information that you think is inaccurate, by contacting us directly via telephone or by sending us an email on [websites@itsupp.co.za](mailto:websites@itsupp.co.za).

**Objection:** you may, on reasonable grounds, object to us using your Personal Information for certain purposes. If you object, we will stop using your Personal Information, except if POPI allows its continued use. To exercise this right or to discuss it with us, please contact us on [websites@itsupp.co.za](mailto:websites@itsupp.co.za).

These requests may be subject to an access to information request in terms of POPI or other applicable laws and we may require you to verify your identity, identify the rights you are wishing to exercise and pay a fee.

## Security

We have implemented appropriate technical and organisational security measures designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing. These measures are in accordance with the requirements of POPI.

The internet is an open and often vulnerable system and the transfer of information via the internet is not completely secure. Although we will implement all reasonable measures to protect Personal Information, we cannot guarantee the security of your Personal Information transferred to us using the internet. Therefore, you acknowledge and agree that any transfer of Personal Information via the internet is at your own risk and you are responsible for ensuring that any Personal Information that you send is sent securely. Fourways assumes no liability for the interception, alteration, or misuse of the information you provide via the internet.

We will report any security breach to the applicable regulatory authority in terms of POPI and to the individuals or companies whose Personal Information is involved in the

breach. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your Personal Information, kindly notify us by sending an email to [websites@itsupp.co.za](mailto:websites@itsupp.co.za).

## Direct Marketing and Opting Out

We may process your Personal Information to contact you to provide you with information about our Services that may be of interest to you. Where we provide Services to you (where you are a customer of ours), we may send information to you regarding our Services and other information, using the contact details that you have provided to us. We will only send you direct marketing communications where you have consented to us sending you direct marketing or otherwise in compliance with POPI, for example if you are our customer.

If you prefer not to receive any or all of these communications, you may opt out from marketing activities by following the directions provided within the electronic newsletters and announcements or by contacting us. After you unsubscribe from marketing activities, we will not send you any direct marketing communications, but we will continue to contact when necessary in connection with providing you with the Services or in connection with the agreement between us.

## Retention of Personal Information

We take every reasonable step to ensure that your Personal Information is only processed for the minimum period necessary for the purposes set out in this Privacy Policy.

We retain Personal Information in accordance with the required retention periods in POPI or other applicable laws or for our legitimate business purposes. We will only retain your Personal Information for the purposes explicitly set out in this Privacy Policy. We may keep Personal Information indefinitely in a de-identified format for statistical purposes, which may include for example statistics of how a person use the Website and Services, without linking his or her identity to the statistical data.

This Privacy Policy also applies when we retain your Personal Information and we may retain your Personal Information for the duration of any period necessary to establish, exercise or defend any legal rights.

## Lodging a Complaint

If you want to raise any objection or have any queries about our privacy practices, you can contact us at [websites@itsupp.co.za](mailto:websites@itsupp.co.za).

You also have the right to formally lodge a complaint with the Information Regulator:

- Website: <http://www.justice.gov.za/inforeg/index.html>
- Address: SALU Building, 316 Thabo Sehume Street, Pretoria
- Tel: 012 406 4818
- Fax: 086 500 3351

- Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)