



Privacy Policy

1. Introduction

We respect your privacy and take it very seriously. We are Turn Left Media (Pty) Ltd (Registration number 2016/195304/07) and this is our plan of action for the protection of your personal information. The purpose of this policy is to describe the way that we collect, store, use, and protect data that can be associated with you or another specific natural or juristic person (like a company) and can be used to identify you or that person (**personal data**).

2. Application

This policy applies to you when you:

- sign a contract with us;
- visit our website;
- and filled out the 'contact us' form; or
- request our services as a customer (i.e. when we run a campaign for you).

3. Personal information

Personal data includes:

- certain information that we collect automatically when you visit our website or use our application;
- 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; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, social media platform, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

3.1. Common examples

Common examples of the types of personal data 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.

3.2. Sensitive personal data

Depending on the goods or services that you require, we may also collect sensitive personal data 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.

4. Acceptance and changes

4.1. Acceptance required

You must accept all the terms of this policy when you order any of our goods or order, register for, or use the website, application or any of our services. If you do not agree with anything in this policy, then you may not order any of our goods or order, register for, or use the website, application or any of our services. You may not order any of our goods or order, register for, or use the website, application or any of our services if you do not accept this policy.

4.2. Legal capacity

You may not access our website, application, or order our goods or services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

4.3. Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

4.4. 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 the application, 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 using the website, the application and our goods and services. If you continue to use the website, the application or our goods 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.

5. Collection

5.1. Automatic

We collect your **Internet usage information** automatically when you visit our website, including your IP address, browser details, and usage information, which we may use to display our website correctly, track your activities on it, or for other necessary purposes.

5.2. On submission.

We ask you to provide us certain **identifying information** when you submit information through our 'contact us' form. We will use this personal data to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy. This personal data may 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.

5.3. Through a request

We ask you to provide us certain **services information** when you request our services.

5.4. Voluntarily.

We may ask you to provide us certain **optional information** on a voluntary basis. This includes content or products that you decide to upload or download from our website or application or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website or application.

5.5. Consent to collection

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

5.6. Purpose for collection.

We may process your information for the purposes that you indicated when you provided it to us. We generally collect and process your personal information for various purposes, including:

- **services purposes** – such as collecting requests for our services and supplying you with those services; and
- **business purposes** –proposed and actual transactions;

Processing includes gathering your personal information, disclosing it, and combining it with other personal information.

6. Use

6.1. 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 data 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 data.

6.2. Processing.

We may process your personal information to fulfil our obligations to you.

6.3. Cookies.

We may place small text files called 'cookies' on your device when you visit our website or use our application. These files do not contain personal data, but they do contain a personal identifier allowing us to associate your personal data with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts them automatically, but you can often change this setting or delete them manually. However, we won't be able to provide you with access to certain aspects of our website where cookies are necessary if you do so. We have no access to or control over any cookies that our business partners use on our website and they have their own privacy policies that govern them. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

6.4. Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

6.5. 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 to 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 data. We merely use them to compile anonymous information about our website.

6.6. Messages

We may use your identifying information to send you administrative and update messages about the website. We may also sometimes send you promotional messages, but you may choose to opt-out of them.

6.7. Targeted content.

While you are logged into the website or application, we may display targeted adverts and other relevant information based on your personal data. In a completely automated process, computers process the personal data and match it to adverts or related information.

We never share personal data 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 data. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal data to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal data.

7. Disclosure

7.1. Sharing

We may share your personal information with third parties for the purposes of fulfilling our obligations to you, including with:

- other companies or divisions within our group;
- our contractors who help provide part of our goods or services;
- third parties as required by applicable law.
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and

7.2. Honour this policy

We will require anyone that we share your personal information with to honour this policy whenever possible in terms of applicable law.

7.3. Mandatory disclosure

We may disclose personal information to third parties if required for legal reasons, such as to regulators as required by law or governmental audit, law enforcement as required by a subpoena or court order, third parties as required by applicable law and to protect the safety of the individual or the general public.

7.4. No selling

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

7.5. Personnel

We may need to disclose personal information to our personnel to do their jobs, but will not do so unnecessarily and only for the purpose of enabling them to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel. Any of our employees or personnel that handle your personal data will have signed non-disclosure and confidentiality agreements.

7.6. Change of ownership

We may assign our rights to the personal information we process to our new owners if our ownership changes for any reason. We will disclose the transfer on our website. If you are concerned about your personal data migrating to a new owner, you may request us to delete your personal data.

8. Security

We take the security of personal data very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal data only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

9. Accurate and up to date

We will try to keep the personal data 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 data on the website. You are able to review or update any personal data 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 data, we take steps to verify your identity before granting you access to your account or making any corrections to your personal data. Throughout your interaction with us you retain the right to rectify personal data that is incorrect or inaccurate. This does not apply if we process your personal data in our capacity as an operator or processor on behalf of a responsible party or data controller.

Please keep your personal data accurate and up to date by accessing your account, emailing us, by phoning us.

10. Retention

We will only retain your personal data 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 data.

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

We will only retain your personal data for as long as is necessary.

11. Transfer to another country

We may transmit or transfer personal data outside of the country in which it was collected to a foreign country and process it in that country. Personal data may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal data may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal data in a foreign country whose laws regarding processing of personal data may be less stringent.

12. Updating or removing

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

You are entitled to a right to be forgotten. We will delete any personal data that you don't want us to have. If you do this, we will remove your personal data from our system, but we may still retain certain personal data as required or allowed by law, including:

- where we can show legitimate grounds for processing your personal data that override your request; or
- where we process your personal data in order to establish, exercise or defend legal claims.

If you are a data subject of one of our customers (who is the data controller), then you must submit your request to the relevant data controller who will then delete your personal data.

13. Restriction of processing

You may request that we restrict the use of your personal data. When we restrict your personal data we still have the right to store it but not use it. You can ask that we do this verbally or in writing. We will respond to the request within 30 days.

14. Data portability

If you should wish to transfer your data from us to another data controller that we will facilitate this transfer. We will pass on all of our personal data to the data controller.

If you are a data subject of one of our customers (who is the data controller), then you must submit your request for your personal data to the relevant data controller, who will then export your personal data as a Microsoft Excel or CSV file.

15. Data breaches

We will notify our customers of any confirmed data breaches that has occurred. It is our customers' responsibility to notify relevant supervisory authority and any affected data subjects of the data breach.

16. 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.

17. Enquiries

Please contact us if you have any questions about this privacy policy or how we handle your personal information.