



# Privacy Policy

## 1. Introduction

This is the Privacy Policy for Cognition Holdings Limited (Registration number: 1997/010640/06). We treat personal information obtained through the use of this website (as well as the websites of other entities in the Group) as private and confidential. We are committed to providing you with secure access to our online services.

The purpose of this policy is to describe how 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).

## 2. Who does this policy apply to?

If you are:

- ❖ a customer that we provide services to; or
- ❖ a visitor to our website

then this policy applies to you.

## 3. What is Personal Information?

### 3.1 Personal information includes:

- ❖ certain information that we collect automatically when you visit our website;
- ❖ certain information collected when you register for one of the services offered by one or more of our subsidiaries (see below); and
- ❖ optional information that you provide to us voluntarily (see below);

### 3.2 Personal Information does not include:

- ❖ information that has been made anonymous so that it does not identify a specific person;
- ❖ information that you have provided voluntarily in an open, public environment or forum including any blog, 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).
- ❖ non-personal statistical information collected and compiled by us; and
- ❖ permanently de-identified information that does not relate or cannot be traced back to you specifically.



#### **4. Common examples**

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

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

#### **5. Special personal information**

Depending on the services that you require and/or make use of, we may also collect special personal information which includes information regarding your:

- ❖ race or ethnic origin;
- ❖ trade union membership;
- ❖ political persuasion;
- ❖ health or sex life;
- ❖ criminal behaviour;
- ❖ biometric information; and
- ❖ financial information.

If we do collect special personal information we will tell you before we collect any special personal information and we will tell you why we are collecting it so that you can make an informed decision about whether to provide us with the special personal information or not.

#### **6. Acceptance**

To use our services you must accept all the terms of this policy. If you do not agree with anything in this policy, then you should not use or register for our services.

#### **7. Legal capacity**

If you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts then you may not access our website request our services.



## **8. Deemed acceptance**

You are deemed to have read, understood, accepted, and agreed to be bound by all of the terms of this policy when you accept this policy,

## **9. 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.

## **10. Changes**

From time to time we may change the terms of this policy. If we do, we will notify you of 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 we will indicate the date that they were last updated. If we make changes and you do not agree with the changes, then you must stop using the website and services. If you continue to use the website or our services after we have notified you of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted the updated terms.

## **11. Collection**

### **11.1 On registration**

If you register on the website of one of our subsidiaries, you will no longer be anonymous to us. When you register on one of our subsidiary websites you may be required to provide us with certain personal information.

This personal information may include:

- ❖ your name and surname;
- ❖ your email address;
- ❖ your telephone number;
- ❖ your ID number;
- ❖ your company name, company registration number, and VAT number;
- ❖ your postal address or street address; and
- ❖ your username and password.

**11.2** We will use this personal information to provide you with the services for which you have registered as well as information that we reasonably think appropriate, and for any other purposes set out in this policy or in the terms relating to that particular service.



#### **12. On request**

When you make use of our services, you may be asked to provide us with additional information on a voluntary basis.

#### **13. 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.

#### **14. Cookies**

We may place small text files called 'cookies' on your device when you visit our website. For more information about the cookies we use please read our <https://www.cgn.co.za/files/cookies.pdf>.

#### **15. Web beacons**

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allows 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 information. We merely use them to compile anonymous information about our website.

#### **16. Optional details**

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys or when registering for certain services.



## 17. Recording calls

We may monitor and record any telephone calls that you make to us and if we do we will tell you. If you don't agree to us monitoring and recording telephone calls then you must request us not to.

## 18. Purpose of collection

18.1 We may use or process any service information or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

18.2 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:

- ❖ **service purposes** – such as collecting orders or requests for and providing our goods or services;
- ❖ **marketing purposes** – such as pursuing lawful related marketing activities;
- ❖ **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- ❖ **legal 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.

## 19. 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.



## **20. Use**

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

## **21. Messages and updates**

We may send administrative messages and email updates to you about the website. In some cases, we may also send you promotional messages. You can choose to opt-out of promotional messages.

## **22. 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 the 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 from 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.

## **23. Sharing**

We may share your personal information with:

- ❖ other divisions or companies within the Group 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 (they will only use this information to send you marketing communications if you have requested their goods or services);
- ❖ 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 services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these services providers only use your information in connection with the services they supply or perform for us and not for their own benefit); and



- ❖ other third parties who provide us with relevant services where appropriate.

#### **24. Regulators**

We may disclose your personal information as required by law or government department.

#### **25. Law enforcement**

We may disclose personal information if required:

- ❖ by a subpoena or court order;
- ❖ to comply with any law;
- ❖ to protect the safety of any individual or the general public; and
- ❖ to prevent violation of our customer relationship terms.

#### **26. No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided for in this privacy policy or by the terms of any specific service for which you may have registered.

#### **27. Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

#### **28. Employees**

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

#### **29. 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.



### **30. Security**

We take the security of personal information 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 information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

### **31. 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 on the website. 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.

### **32. 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.

### **33. 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. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.



#### **34. Updating or removing**

You may choose to correct or update the personal information you have submitted to us, by clicking completing the online Request for Access at [https://www.cgn.co.za/files/data\\_request\\_form/](https://www.cgn.co.za/files/data_request_form/) or by completing Annexure B of our PAIA Manual which is available at [https://cgn.co.za/files/paia\\_manual.pdf](https://cgn.co.za/files/paia_manual.pdf) or by contacting us by phone or email.

#### **35. 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.

#### **36. Enquiries**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us by sending an email to [privacy@cgn.co.za](mailto:privacy@cgn.co.za).