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## CLIENT PRIVACY NOTICE

From the moment you express interest in our goods or services to the moment your client journey with us comes to an end, we collect and use your personal information to provide you with our goods or services and so much more. This notice is about what kind of personal information we collect, how we use and store it, and what rights you have in terms of your personal information.

If you have any questions, please contact [POPIA@ecn.co.za](mailto:POPIA@ecn.co.za).

### 1. WHAT THIS PRIVACY NOTICE IS ABOUT

<b>Who does this privacy notice apply to?</b>	This notice applies to all Electronic Communications Network (Pty) Ltd (ECN) clients. In terms of the Protection of Personal Information Act ('POPIA'), you are the data subject.
<b>Who are you sharing your information with?</b>	You are sharing your information with Electronic Communications Network (Pty) Ltd.  Our registered address is:  Reunert - Nashua Building, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, 2191, South Africa  In terms of POPIA, we are the responsible party.
<b>This privacy notice is part of our agreement with you.</b>	This privacy notice forms part of our agreement with you. You should read it along with your ECN subscriber, dealer or service provider agreement and the standard terms and conditions.
<b>What kind of information we collect and how we use it.</b>	As your goods or services provider, we collect, use and retain your personal information.



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	<p>In most cases, the personal information we collect from you is mandatory. We must collect it to comply with the law or because we need it to provide our goods or services to you.</p> <p>When we collect personal information from you that is not mandatory, we always have a specific purpose.</p> <p>If you choose not to provide us with the personal information we need, it will limit our ability to provide goods or services to you. For example, if you do not provide us with your physical address, we may not be able to deliver or install the goods or services that you purchased.</p>
<b>What personal information is.</b>	<p>Personal information is all information relating to a specific individual. This includes contact information, information relating to your race, gender, sex, pregnancy status, marital status, ethnic or national origin, sexual orientation, physical or mental health, disability, religion, belief, culture, language, education background, financial information, criminal behaviour, employment history, personal opinions, views or preferences, and private or confidential correspondence.</p> <p>It does not matter whether the information is held on paper or in an electronic or other format – it is still personal information and must be protected.</p>
<b>Companies also have personal information which must be protected.</b>	<p>A company can also have personal information that must be protected, for example, financial information such as bank and financial statements, B-BBEE scores and tax information.</p>



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<b>We will change how we work with personal information from time to time, and we will use this notice to tell you about it.</b>	We may have to change this privacy notice from time to time to accommodate changes in our business or changes to the law.
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## 2. WHAT INFORMATION WE COLLECT

<b>The type of goods or services we provide you with will determine the type of information we collect about you.</b>	The type of client information we collect and share depends on the goods and services we provide to you and any legal requirements.
<b>We will collect information directly from you or third party sources, for example, by performing a background check with a registered credit bureau.</b>	<p>Most of the time we will collect your information directly from you. However, sometimes we will also collect information from other sources such as a registered credit bureau, public records, publicly available information, government-issued sanctions lists or media sources.</p> <p>We may collect information about you from third party sources under the following circumstances:</p> <ul style="list-style-type: none"><li>• With your consent (e.g. for us to do a credit check);</li><li>• If the information is derived from a public record (e.g. the Deeds' Registry or CIPC records);</li><li>• If we need the information to comply with an obligation imposed by law (e.g. income tax laws, anti-money laundering or bribery laws and other regulatory requirements);</li><li>• If collecting the information from a third party source is necessary for maintaining our legitimate interests; and</li><li>• If collecting the information directly from you would prejudice a lawful purpose of the</li></ul>



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	collection (e.g. if we need to verify information about you in a background check).
<b>Here is a list of the personal information that we collect about you.</b>	<p>We collect:</p> <ul style="list-style-type: none"><li>• the personal information of your relevant business contact person (such as name, contact number, email address, job title, and company department)</li><li>• company name, contact details and billing details (e.g. physical or postal address)</li><li>• card details</li><li>• CIPC number</li><li>• VAT number</li><li>• in some cases, the names, ID numbers and contact details of your directors, members or partners</li><li>• any other information which is relevant for us to provide you with a specific type of service.</li></ul>
<b>We also generate information about you in the form of records.</b>	<p>We generate records of:</p> <ul style="list-style-type: none"><li>• your billing profile (which services you use and what information goes on your invoice)</li><li>• your payment history</li><li>• any queries or calls you log with our client services, sales or billing departments.</li></ul>



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### 3. WHY WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION

3.1 We process your personal information to conclude a contract with you and to meet our contractual obligations.

<p><b>We need your personal information to manage our relationship with you and run our business.</b></p>	<p>Personal information is essential throughout the client journey. We use your personal information:</p> <ul style="list-style-type: none"><li>• during the lead generation and processes (e.g. when you enquire about our goods or services, and we send you a quote);</li><li>• to provide our goods or services to you, to carry out a transaction with you and maintain our relationship;</li><li>• to provide you with maintenance or assistance with any of our goods or services;</li><li>• to process your orders;</li><li>• to enable the collection or delivery of stock;</li><li>• to activate your services;</li><li>• to action porting requests;</li><li>• to allocate and migrate numbers;</li><li>• to provide support services;</li><li>• to invoice you or send you any other necessary documentation;</li><li>• to process your commission payment;</li><li>• to process your payment; and</li><li>• for other general administrative and business execution reasons (e.g. doing quarterly sales forecasts).</li></ul>
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3.2 We process your personal information because it is in your or our legitimate interest to do so, because we are legally required to do so, or because you have given us permission.

<b>We process some personal information because it is in your legitimate interest to do so.</b>	<p>When you contact us through our website, email or telephone, we use the information we collect to reply to, investigate, and resolve your query, complaint, or request.</p> <p>When we identify any of our other goods or services that might interest you and then send you information regarding these goods or services.</p>
<b>We process some personal information because it is in our legitimate interest to do so.</b>	<p>We may verify your information through a background check.</p> <p>If your account is in arrears, we may process your information for debt collection.</p> <p>We monitor our premises by CCTV and other access control mechanisms (e.g., a visitors' sign in register) to ensure the safety of our property and all our employees, suppliers and client.</p> <p>We use your personal information</p> <ul style="list-style-type: none"><li>• when we conduct quality assurance to maintain and improve the quality of our goods or services;</li><li>• when we conduct market or client satisfaction research; and</li><li>• when we analyse our data for market research purposes.</li></ul>
<b>We are legally required to process some personal information.</b>	<p>We will collect, use, and retain your personal information to ensure that we comply with income tax,</p>



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	<p>financial reporting laws, and other legislation. We will use your personal information for:</p> <ul style="list-style-type: none"><li>• internal and external audit;</li><li>• financial and tax reporting;</li><li>• the detection and prevention of fraud, crime, money laundering or other malpractice;</li><li>• any legal proceedings;</li><li>• any other ways in which legislation/regulations require ECN to process client personal information.</li></ul> <p>Here are some of the pieces of legislation which affect why your personal information is collected, used and retained:</p> <ul style="list-style-type: none"><li>• Financial Intelligence Centre Act 38 of 2001</li><li>• Income Tax Act 58 of 1962</li><li>• National Credit Act 34 of 2005</li><li>• Value Added Tax Act No. 89 of 1991</li><li>• Prescription Act 68 of 1969</li><li>• King Code IV</li><li>• JSE Listing Requirements</li><li>• Companies Act 71 of 2008</li><li>• Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002</li><li>• Electronic Communications Act 36 of 2005</li><li>• Consumer Protection Act No. 68 of 2008</li></ul>
<p><b>We process some personal information with your consent.</b></p>	<p>When you subscribe to our newsletter, we send it to you by email. You can unsubscribe at any time by</p>



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	<p>following the unsubscribe link at the bottom of the email or by contacting us.</p> <p>We may send you our marketing material if you consented to receive it.</p> <p>Where we are required to do so by the National Credit Act 34 of 2005 and its regulations, we will always ask for your consent before doing a credit check on you.</p>
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#### 4. HOW WE SHARE YOUR INFORMATION

<p><b>We only share your information if it is required to manage our relationship with you or for legitimate business reasons.</b></p>	<p>Here are some of the instances when we are required to share your information:</p> <ul style="list-style-type: none"><li>• client information may in some instances be shared with other companies in the Reunert group for everyday business purposes;</li><li>• sometimes we are required by legislation to share information with the government, regulators or a court (e.g. SARS, the JSE, the FIC etc.);</li><li>• from time to time, parts of the business may be sold, which could include a transfer of client information;</li><li>• we might share your information with companies to verify it for background check purposes;</li><li>• we might share your information with payments processors and banks to process your payment;</li></ul>
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	<ul style="list-style-type: none"><li>• we might share your information with service providers who install or perform maintenance on the goods we provide to you;</li><li>• we might share your information with companies who provide services on our behalf so we can do business(e.g. tax, auditors, IT, accountants, lead generation, data analytics, legal and other professional consultants); and</li><li>• we may share information about you if you have given the third party consent to obtain information from us. An example is when you have listed us as a trade reference.</li></ul>
<b>We only share the minimum amount of your information.</b>	We only share the minimum amount of information that the service provider requires.
<b>We only share your information with service providers we trust.</b>	We require that service providers agree to keep your information secure and confidential and only use it for the purposes for which we shared it with them.
<b>Some of the service providers that we use may be in other countries.</b>	When we share information with countries that may not have the same levels of protection of personal information as South Africa, they must undertake to protect personal information to the same level that we do.
<b>We provide for appropriate safeguards before we share.</b>	We have appropriate safeguards in place in contracts between our local and foreign service providers and us.

## 5. HOW WE STORE YOUR INFORMATION

<b>We retain your personal information for as long as it is reasonably necessary.</b>	We retain your personal information for as long as we have a legitimate reason to keep it. These periods vary depending on the type of personal information,
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	why we originally collected it and if there is a specific retention period required by law.
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## 6. HOW WE KEEP YOUR INFORMATION SECURE

<b>We have reasonable security measures in place to protect your personal information and to minimise the impact of a breach.</b>	<p>We base our security measures on the sensitivity of the personal information that we hold. Our security measures are in place to protect your personal information from:</p> <ul style="list-style-type: none"><li>• loss</li><li>• misuse</li><li>• unauthorised access</li><li>• being altered</li><li>• being destroyed</li></ul>
<b>We regularly monitor our systems for possible vulnerabilities and attacks.</b>	<p>No system is perfect, and we cannot guarantee that we will never experience a breach of any of our physical, technical, or managerial safeguards. Still, we regularly monitor our systems for vulnerabilities.</p>
<b>We will let you know of any breaches that may affect your personal information.</b>	<p>If something should happen, we have taken steps to minimise the threat to your privacy, and we will let you know if your personal information has been compromised.</p> <p>We will also let you know how you can help minimise the impact of the breach.</p>



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## 7. YOUR PERSONAL INFORMATION RIGHTS

<b>You may ask us about your personal information.</b>	You have the right to know when we collect and use your personal information and to ask us what we know about you and what we do with that information.
<b>You may access your personal information.</b>	<p>You may ask to access your personal information by contacting <a href="mailto:POPIA@ecn.co.za">POPIA@ecn.co.za</a>.</p> <p>We may take up to one month to respond to your request and may charge a fee in some circumstances. We will let you know if this is the case.</p>
<b>You have control over your personal information.</b>	<p>You may:</p> <ul style="list-style-type: none"><li>• ask that we update incorrect personal information or complete personal information that may be incomplete;</li><li>• ask that we delete your personal information;</li><li>• ask to receive your personal information in a structured, commonly used and machine-readable format;</li><li>• ask that we reuse your personal information for your purposes across different services;</li><li>• object to the processing of your personal information under certain circumstances;</li><li>• object to automated decision-making and profiling;</li><li>• ask that a human review any automated decisions that we make about you, express your point of view about it, and obtain an explanation of the decision. You may challenge any automated decision made about you; and</li><li>• ask that we restrict our use of your personal information.</li></ul>



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<b>You have the right to unsubscribe.</b>	You have the right to unsubscribe from any direct marketing we send you.
<b>You have the right to lodge a complaint with the Information Regulator.</b>	You can contact the Information Regulator at <a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a> .