

# WEBSITE PRIVACY NOTICE

We value your privacy and we want you to understand how we collect data through our website, how we use that data, and how we disclose it.

This notice is about what kind of personal information we collect, how we use and store it, how we protect it, and what rights you have in terms of your personal information.

If you have any questions, please contact POPIA@ecn.co.za.

Who does this privacy notice apply to?	This notice applies to everyone that visits the Electronic Communications Network (Pty) Ltd (ECN) website. In terms of the Protection of Personal Information Act ('POPIA'), you are the data subject.
Who are you sharing your information with?	You are sharing your information with ECN. 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.
What personal information is.	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,

## 1. WHAT THIS PRIVACY NOTICE IS ABOUT



	employment history, personal opinions, views or preferences, and private or confidential correspondence.
	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.
We may update this notice from time to time.	From time to time, we may have to change this privacy notice to accommodate changes in our business or changes to the law.

#### 2. HOW WE COLLECT AND USE YOUR INFORMATION

When you sign up for our newsletter.	You can choose to subscribe to our newsletter. However, if you want to unsubscribe you can do so at any time by following the unsubscribe link at the bottom of our email or by contacting us.
When you contact us.	The type of personal information we collect and share depends on whether you submit questions, request information, inquire about our products or services, or give us feedback. When you contact us, we collect the information included in your message, such as your contact details (e.g., name, address, telephone numbers, fax numbers, email addresses). We use this information to communicate with you.
When we use cookies to optimise our website.	Most of the time we collect your information directly from you. However, sometimes we collect your personal information using cookies.



When you visit our website, we collect certain information automatically by using cookies, including:
<ul> <li>your device operating system</li> <li>access time</li> <li>other device data</li> <li>advertisements and other areas of the website you clicked on</li> <li>the services page you visit</li> <li>your location</li> </ul>

# 3. HOW WE USE COOKIES

We use cookies to collect information for our website to function optimally.	We use first-party and third-party cookies. First-party cookies are cookies that we put on your device directly.
	Third-party cookies are cookies that our service providers place on your device when you visit our website. We use these service providers to analyse how you use our website and to detect malicious visitors.
We use cookies that are essential for our website.	These cookies are essential for the normal functioning of our website and for you to use its features, such as accessing secure areas of the site.
We use cookies to collect statistics and analyse how you use our website.	These cookies, which include cookies from third-party analytics services, collect information about how you use our website, such as the pages you visit and the links you click on. We cannot use this information to identify you as the information is anonymised. The



	sole purpose of these cookies is to improve the functionality of our website.
	You may opt out of these cookies without affecting the functionality of our website.
We use cookies to store your preferences.	These cookies allow our website to remember choices you made in the past, such as your selected font size.
	You may opt out of these cookies, but this will affect some functionality of our website.
We use cookies for marketing and advertising purposes.	These cookies track your online activity to help us deliver relevant advertising, or limit how many times you see an ad. These cookies can share information with other organisations or advertisers.
	You may opt out of these cookies without affecting the functionality of our website.
You can manage cookies through your web browser.	Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies.
	You can find out how to do this by clicking 'help' on your browser's menu or by visiting www.allaboutcookies.org.
	If you disable cookies, it may affect the functionality of our website.
	These links will explain how to manage cookies for the most common browsers:
	<ul> <li><u>Microsoft Edge</u></li> <li><u>Google Chrome</u></li> <li><u>Firefox</u></li> <li><u>Safari</u></li> </ul>



## 4. HOW WE SHARE YOUR INFORMATION

We may share your personal information internally or with service providers to run our website.	<ul> <li>We may have to share your personal information:</li> <li>in some instances with other companies in the Reunert group for everyday business purposes;</li> <li>to comply with legislation, the government, or a court;</li> <li>if, from time-to-time, parts of the business are sold which could include a transfer of your information;</li> <li>when we share our website visitor statistics with Google for data analytics purposes; and</li> <li>with companies who provide services on our behalf and with our instructions (e.g., our website maintenance service providers).</li> </ul>
We only share the minimum amount of your personal information.	We only share the minimum amount of your personal information that our service providers require.
We only share your personal information with service providers we trust.	We require that our service providers agree to keep your personal information secure and confidential and only use it for the purposes for which we shared it with them.
Some of the service providers that we use may be in other countries.	When we share personal information with our service providers in other countries that may not have the same levels of protection of personal information as South Africa, they must undertake to protect your personal information to the same level that we do.
We provide for appropriate safeguards before we share your personal information.	We have appropriate safeguards in place in contracts between our local and foreign service providers and us.



#### HOW WE STORE YOUR INFORMATION

We retain your personal information for as long as it is reasonably necessary.	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, the reason 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

We have reasonable security measures in place to protect your personal information and to minimise the impact of a breach.	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:
	<ul> <li>loss</li> <li>misuse</li> <li>unauthorised access</li> <li>being altered</li> <li>being destroyed</li> </ul>
We regularly monitor our systems for possible vulnerabilities and attacks.	No system is perfect, and we cannot guarantee that we will never experience a breach of any of our physical, technical, or managerial safeguards, but we regularly monitor our systems for vulnerabilities.
We will let you know of any breaches that may affect your personal information.	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. We will also let you know how you can help minimise the impact of the breach.

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# 7. YOUR PERSONAL INFORMATION RIGHTS

You may ask us about your personal information.	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.
You may access your personal information.	You may ask to access your personal information by contacting <u>POPIA@ecn.co.za</u> . 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.
You have control over your personal information.	<ul> <li>You may:</li> <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 own 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, obtain an explanation of the decision, and challenge any automated decision made about you; and</li> </ul>



	ask that we restrict our use of your personal information.
You have the right to unsubscribe.	You have the right to unsubscribe from any direct marketing we send you.
You have the right to lodge a complaint with the Information Regulator.	You can contact the Information Regulator at inforeg@justice.gov.za.