# PRIVACY AND COOKIE POLICY

### PRIVACY POLICY

RENEWONLINE hereby undertakes to take all reasonable steps to protect the personal and confidential information of our users. This policy describes how we use the personal information we collect from you. By using this application, you agree and signify your acceptance of our Privacy Policy.

## BACKROUND

The Protection of Personal Information Act, No. 4 of 2013 describes personal information as information relating to the identifiable, living, natural person and where applicable, an identifiable, existing juristic person, including names, identity numbers, contact details, location information and nationality. The Protection of Personal Information Act, No. 4 of 2013 requires us to inform you of how we utilize and store your personal information.

The Electronic Communications and Transaction Act, No. 25 of 2002 also contains certain principles regarding the electronic collection of personal information and we strive to meet these requirements in ensuring that your right to privacy is protected.

### **OBJECTIVE**

We undertake that we shall comply with The Protection of Personal Information Act, No. 4 of 2013 as well as The Electronic Communications and Transaction Act, No. 25 of 2002 by disclosing to you, the approach we will follow in order to ensure your private and confidential information is safeguarded, as well as how we shall utilize the personal information which we obtain on our application.

## APPLICATION OF OUR PRIVACY POLICY

### 1. 1. We require your consent

By providing your details and/or using our application, you confirm and agree to the terms and conditions as contained in our application, specifically, this privacy policy and your expressly consent thereto that we may collect, store and disclose your personal information as described below.

### 2. 2. How we will protect your personal information

We will take all reasonable steps to protect your personal information. The basic measures are as follows:

- No one has physical access to the server, as it runs as a VPS at Digital Ocean
- There is a kernel based firewall on the server allowing only certain ports through the firewall.
- Server administration traffic is via an encrypted SSH session.

We utilise encryption between the browser and server to ensure it is secure. The passwords are encrypted in the MYSQL database.

Even though we take all reasonable steps to ensure that all communication is secure and your personal information protected, we do not make any warranties and/or representations that our website content is absolutely safe and secure. We however undertake to comply with the requirements of The Protection of Personal Information Act, No. 4 of 2013 at all times.

### IT TO EXPAND ON WHICH MEASURES ARE TAKEN TO ENSURE APPLICATION SECURITY

Even though we take all reasonable steps to ensure that all communication is secure and your personal information protected, we do not make any warranties and/or representations that our application content is absolutely safe and secure. We however undertake to comply with the requirements of The Protection of Personal Information Act, No. 4 of 2013 at all times.

### 3. 3. How we use the information we collect

We shall only use, process and disclose your personal information to enable us to provide you with products and services and to comply with your particular requests. Furthermore, to improve our services and providing you with information about us via e-mail, telephone or any other means.

We will also use the personal information you provide to monitor or improve the performance of the Application, as well as the services available through this Application.

Please note that the Electronic Communications and Transaction Act, No. 25 of 2002 entitles us to use personal information we obtain to compile profiles for statistical purposes and subsequently, trade in these profiles. This may include plotting your location to geographically interact with us, to enable us to draw heat map, which represent the density of data within different areas of a map. However, no information utilized in such profiles or statistics, will be linked to a specific user.

We utilize the services of third parties for purposes of management and administration of this Application and therefore, your personal information must be shared with these third parties. You hereby agree that we may do so.

We shall only store your personal information as long as is necessary for the purpose for which it was required and according to the regulations governing the duration information should be kept.

We may also use analytics services to collect and analyse which pages of the Application are being viewed, for how long they are viewed and what links are being followed by users. This is done to assist us in ensuring that we share

content which is of interest to our users and which is attended to on an anonymous basis, meaning that no information can be linked to a specific user.

According to the Protection of Personal Information Act, No. 4 of 2013, we may only use your personal information as explained herein above, and to which you hereby consent.

- 4. We may also share your personal information for purposes of our service provision
- 5. S. What does the Electronic Communications and Transaction Act, No. 25 of 2002 say

You hereby consent that we may share the personal information, you share with us, with third parties who are involved in the process of delivering our service to you.

Please be assured that we have the necessary confidentiality agreements in place with these third parties, which inhibits them from using your personal information and to which these third parties are contractually bound.

We are obliged to comply with the principles as contained in the Electronic Communications and Transaction Act, No. 25 of 2002 as well as the Protection of Personal Information Act, No. 4 of 2013, which legislation regulates your right to have your personal information kept private.

In summary, the legislation requires that we may only collect, collate, process and store ('use') your personal information if we have your written permission to do so and as set out herein, unless we are legally required to do so. We may only use your personal information for which it is required and as set out herein, unless we have your written permission to do so.

If you request so, we shall disclose to you, in writing, the purpose for which we have used your personal information. We also undertake to keep record of the personal information and for which it was used.

- 6. Circumstances wherein we may disclose your personal information without your consent
- 7. 7. We may use third party links

According to the Electronic Communications and Transaction Act, No. 25 of 2002 as well as the Protection of Personal Information Act, No. 4 of 2013, we may disclose your personal information without your consent if we are required to do so by law or a Court Order, alternatively, if it is in the public interest.

Our application may contain links to third party websites which redirect you to such third party's websites.

Likewise, third party applications may contain links to our website, and which will redirect you to our website. It is important to note that these third-party websites and applications, are subject to their own terms and conditions and privacy policies.

We are not responsible or liable on behalf of these third parties, nor their representations, warranties or content. We do not exercise control over these websites or applications. Please refer to the privacy policies of these third parties for purposes of establishing how they protect your privacy.

### PRIVACY POLICY CHANGES

It is important to note that we reserve the right to update, modify and amend the terms as contained in this privacy policy from time to time and as we deem fit. Any amendments may include expanding these terms and conditions, by adding new terms thereto.

We are not required to notify you of any amendments to our privacy policy, nor are we required to justify any amendments.

You hereby agree that you shall review this privacy policy for any changes thereto as and when you visit our application.

Save as expressly provided to the contrary in this privacy policy, the amended version of this privacy policy shall always supersede and replace all previous versions thereof.

#### TELEPHONE CALLS

Please note that we record all telephone calls, both, incoming and outgoing.

In terms of the Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002, telephonic conversations may only be recorded with your consent and therefore, by agreeing to this Privacy Policy, you agree, confirm and accept that we record all telephone calls.

We undertake to make all reasonable efforts, in advance, to inform you that we will be recording conversations.

Furthermore, that we use reliable technology to record, store and maintain recordings of conversations in ensuring that your personal information is kept safe. We confirm that we will comply with the Protection of Personal Information Act 4 of 2013 by ensuring that any recordings and storage thereof comply therewith.

You also agree that we may use the recording of your telephonic conversation for internal, training and quality purposes to ensure that we always offer the best service.