



# Privacy Policy

V1.01.26

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## **Ctrl Technologies (Pty) Ltd Privacy Policy**

### **1. Introduction**

We respect your privacy and take it very seriously. We are Ctrl Technologies (Pty) Ltd (registration number 2017/184385/07), and this policy outlines our approach to protecting your Personal Information. It describes how we collect, use, disclose, and store your Personal Information in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**") and other applicable South African legislation.

This privacy policy forms part of and is incorporated by reference into our terms and conditions of service.

### **2. Application**

This policy applies when you visit our website, use our software, or engage with our services as a customer, contractor, employee, or any other person whose Personal Information we process.

### **3. Definitions**

In this policy:

- 3.1 "CTRL", "we", "us", or "our" refers to Ctrl Technologies (Pty) Ltd (registration number 2017/184385/07);
- 3.2 "Personal Information" means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA;
- 3.3 "Processing" includes any operation or activity concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation, use, dissemination, merging, linking, restriction, degradation, erasure or destruction;
- 3.4 "Data subject" or "You" means the person to whom Personal Information relates.

### **4. Personal Information**

#### 4.1 **Scope**

4.1.1 We may collect Personal Information:

4.1.1.1 Automatically when you visit our website and software platforms;

4.1.1.2 Through registration and submission of forms or applications;

4.1.1.3 Through service requests and technical support interactions;

4.1.1.4 When you voluntarily provide information to us; and

4.1.1.5 Through our business relationships with clients, suppliers, and partners.

4.1.2 This policy does not apply to anonymous, de-identified, statistical, and public information.

#### 4.2 **Your Obligations**

4.2.1 You may only provide your own Personal Information, or that of another person if you have their permission to do so.

4.2.2 You warrant that all Personal Information provided to us is true and accurate to the best of your knowledge.

4.2.3 You must promptly notify us of any changes to your personal information.

#### 4.3 **Categories of Personal Information Processed**

We may process the following categories of Personal Information:

4.3.1 Identity Data: name, surname, identity number, date of birth, gender, nationality;

4.3.2 Contact Data: email address, telephone numbers, physical address, postal address;

4.3.3 Professional Data: job title, employer details, professional qualifications, business contact information;

4.3.4 Financial Data: bank account details, payment information, billing address, transaction history;

- 4.3.5 Technical Data: IP address, browser type and version, device information, operating system, login data, usage analytics;
- 4.3.6 Software Usage Data: application performance metrics, feature usage statistics, error logs, system configuration data, API usage data;
- 4.3.7 Communication Data: correspondence records, support tickets, feedback, survey responses; and
- 4.3.8 Marketing Data: preferences for receiving marketing communications, communication history.

## **5. Acceptance and Changes**

### **5.1 Acceptance**

You may not use our services if you do not accept this policy. By using our services, you consent to the processing of your personal information as described in this policy.

### **5.2 Changes**

We may update or amend this policy from time to time. We will notify you of material changes by posting the updated policy on our website and, where required by law, by direct communication. The updated policy will be effective from the date of posting unless otherwise specified. Continued use of our services after notification implies acceptance of the updated policy.

## **6. Collection**

### **6.1 Lawful basis for processing**

We process Personal Information on the following lawful grounds under POPIA:

- 6.1.1 Consent of the data subject;
- 6.1.2 Processing is necessary for the performance of a contract to which the data subject is party;
- 6.1.3 Processing is necessary for compliance with a legal obligation; and/or
- 6.1.4 Processing is necessary for pursuing the legitimate interests of ourselves or a third party.

## 6.2 **Means of processing**

We collect Personal Information in the following ways:

### 6.2.1 Automatically through our Website

We automatically collect internet usage data, including IP address, browser details, and usage information, to optimize your experience. This may include cookies, web beacons, and similar tracking technologies.

### 6.2.2 Automatically through Software

We collect usage analytics and performance data through software tools to improve our offerings. This includes software performance metrics, error logs, feature usage statistics, and system configuration data.

### 6.2.3 On Registration or Submission

We collect identifying information upon registration or submission, including but not limited to name, email address, contact details, company information, and authentication credentials.

### 6.2.4 Through Service Requests

We collect necessary information when you request services, including technical support requests, customisation requirements, and service specifications.

### 6.2.5 Voluntarily

We collect optional information that you provide voluntarily, such as feedback, survey responses, and additional contact preferences.

## 6.3 **Consent to Collection**

We obtain your consent to collect Personal Information when required by law. Where we rely on consent, you have the right to withdraw your consent at any time, though this may affect our ability to provide certain services.

## 6.4 **Purpose for Collection**

We process your data for the following specific purposes:

- 6.4.1 Software licensing and user account management;
- 6.4.2 Technical support and customer service;
- 6.4.3 Software development and improvement;
- 6.4.4 System maintenance and security monitoring;
- 6.4.5 Marketing and promotional activities (with consent);
- 6.4.6 Compliance with legal and regulatory obligations;
- 6.4.7 Employment and contractor management;
- 6.4.8 Financial administration and payment processing; and
- 6.4.9 Business analytics and performance monitoring.

## **7. Use**

### **7.1 Processing**

We process your Personal Information to fulfil our obligations to you, including service delivery, contract performance, and customer support.

### **7.2 Cookies**

We use cookies for personalization and analytics. You may disable cookies through your browser settings, but certain functionalities may be limited.

### **7.3 Messages**

We may send you administrative and update messages about our services, including service notifications, security alerts, and system updates.

### **7.4 Promotional Messages**

We may send promotional messages, but you may opt out at any time by following the unsubscribe instructions in the message or contacting us directly.

### **7.5 Targeted Content**

We may use automated processes to deliver targeted content and personalised user experiences based on your usage patterns and preferences.

## **7.6 Data Quality**

We take reasonable steps to ensure that Personal Information is complete, accurate, not misleading, and updated where necessary.

## **8. Disclosure**

### **8.1 Sharing**

We may share your information with:

- 8.1.1 members of the CTRL Group, including our affiliates, divisions, subsidiaries, holding companies, and associated entities;
- 8.1.2 Service providers and contractors assisting in service delivery under appropriate confidentiality obligations;
- 8.1.3 Third parties as required by law;
- 8.1.4 Cloud service providers and hosting platforms;
- 8.1.5 Software vendors and integration partners;
- 8.1.6 Payment processors and financial institutions; and
- 8.1.7 Professional advisers including lawyers, auditors, and consultants.

### **8.2 Third Party Obligations**

We require third parties who receive Personal Information from us to implement appropriate safeguards and use the information only for the purposes for which it was disclosed.

### **8.3 Mandatory Disclosure**

We may disclose information for:

- 8.3.1 Regulatory compliance;
- 8.3.2 Law enforcement requirements; and
- 8.3.3 Legal proceedings.

#### **8.4 Marketing Purposes**

We may disclose anonymized statistical data for business analysis, provided such data cannot be used to identify individuals.

#### **8.5 Personnel**

Our personnel may access personal data when necessary for their duties and are bound by confidentiality obligations.

#### **8.6 Change of Ownership**

If our ownership changes, we may transfer your personal data accordingly as part of the business transfer, subject to the same privacy protections.

### **9. Storage**

#### **9.1 Data Retention**

We store data securely for as long as necessary to fulfil our obligations, comply with laws, or as required by contractual agreements. We have implemented a data retention schedule that specifies retention periods for different categories of personal information.

#### **9.2 Access and Your Rights**

Under POPIA, you have the right to:

- 9.2.1 request access to your Personal Information;
- 9.2.2 request correction or deletion of your Personal Information;
- 9.2.3 object to or withdraw consent to the processing of your Personal Information;
- 9.2.4 request restriction of processing of your Personal Information; and
- 9.2.5 lodge a complaint with the Information Regulator.

We will verify your identity before fulfilling such requests and respond within the timeframes required by law.



### 9.3 **Accuracy**

We strive to keep personal data accurate and up to date. You are responsible for ensuring that Personal Information you provide to us is accurate and current.

### 9.4 **Participation**

We may ask you to update your information to maintain accuracy. You may update your information through your user account or by contacting us directly.

### 9.5 **Transborder Flows**

9.5.1 We may transfer your Personal Information to countries outside South Africa for processing.

9.5.2 Such transfers will only occur where:

9.5.2.1 The country has been designated as providing adequate protection by the Information Regulator;

9.5.2.2 Appropriate safeguards are in place, such as standard contractual clauses;

9.5.2.3 You have provided explicit consent after being informed of the risks; or

9.5.2.4 The transfer is necessary for the performance of our contract with you.

9.5.3 Current transborder flows include transfers to Ireland and the United States of America for cloud services and authentication purposes.

### 9.6 **Security Measures**

We implement appropriate technical and organisational measures to secure personal information, including:

9.6.1 Access controls and authentication systems;

9.6.2 Encryption of data in transit and at rest;

9.6.3 Regular security assessments and monitoring;

9.6.4 Staff training on data protection; and

9.6.5 Incident response procedures.

## 10. General

### 10.1 Updating or Removing Data

You can update or remove your data via our website or by contacting us. Requests for data deletion will be processed in accordance with our legal obligations and may require verification of your identity.

### 10.2 Limitation

We are not responsible for third-party privacy practices. This policy does not apply to third-party websites, applications, or services that may be linked to or integrated with our services.

### 10.3 Enquiries

10.3.1 For any enquiries regarding this privacy policy or your Personal Information, please contact our Information Officer:

Name: Pieter Jacobus Venter

Tel: 083 287 0250

Email: [security@ctrltechnologies.co.za](mailto:security@ctrltechnologies.co.za)

10.3.2 For any general questions or queries, please contact us:  
[helpdesk@ctrltechnologies.co.za](mailto:helpdesk@ctrltechnologies.co.za)

10.3.3 If you are not satisfied with our response to your privacy concerns, you may lodge a complaint with the Information Regulator of South Africa:

Website: [www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Telephone: 012 406 4818

### 10.4 Governing Law

This privacy policy is governed by South African law, including POPIA and other applicable data protection legislation.