

Ctrl Technologies

Privacy Policy

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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, engage with us as a customer, partner, supplier, contractor, employee, or any other person whose Personal Information we process in connection with our general business operations.

If you are a User of, or an End-Customer whose information is processed through, the Ctrl Tower product, the Ctrl Tower Privacy Notice (available at www.ctrltechnologies.co.za/legal/Ctrl-Tower_Privacy_Notice.pdf) supplements this policy and applies specifically to that processing. Where the Ctrl Tower Privacy Notice contains terms specific to Ctrl Tower, those terms prevail over this policy in respect of that processing.

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 "Ctrl Tower" means our communication hub product for vehicle dealership Finance & Insurance teams, the processing for which is governed by the Ctrl Tower Privacy Notice;

3.3 "Personal Information" means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA;

3.4 "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;

3.5 "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;

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 Communication Data: correspondence records, support tickets, feedback, survey responses; and

4.3.7 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 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.

6.2.3 Through Service Requests

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

6.2.4 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 General business operations, including managing our relationships with clients, partners and suppliers;

6.4.2 Marketing and promotional activities (with consent where required);

6.4.3 Compliance with legal and regulatory obligations;

6.4.4 Employment and contractor management;

6.4.5 Financial administration and payment processing;

6.4.6 Business analytics and performance monitoring.

Processing in connection with Ctrl Tower (including processing of User account data, End-Customer Data, and related communications) is governed by the Ctrl Tower Privacy Notice.

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 personalisation 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 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 Personal Information where required for regulatory compliance, law enforcement requirements, or legal proceedings. Before responding to any such request from a public authority, we review the request to confirm its legality and validity, disclose only the minimum information necessary to comply, reserve the right to challenge requests we consider unlawful, and keep a record of all such requests and our responses, including the legal reasoning applied.

8.4 Personnel

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

8.5 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 Transborder Flows

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

9.4.2 Such transfers will only occur where:

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

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

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

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

9.4.3 Current transborder flows include transfers to Ireland cloud services purposes. Transfers in connection with Ctrl Tower are addressed in the Ctrl Tower Privacy Notice.

9.5 Security Measures

We implement appropriate technical and organisational measures to secure personal information, including access controls and authentication systems, encryption of data in transit and at rest, regular security assessments and monitoring, staff training on data protection, and 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: 27832870250

Email: security@ctrltechnologies.co.za

10.3.2 For any general questions or queries, please contact us: info@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/

Email: 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.