



IMPACTFUL
SPECIALIST SOLUTIONS
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IMPACTFUL SPECIALIST SOLUTIONS

Privacy Policy

V1.0

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IMPACTFUL SPECIALIST SOLUTIONS PRIVACY POLICY - SOUTH AFRICA

1. INTRODUCTION

- 1.1 This privacy policy together with our terms and conditions **IMPACTFUL SPECIALIST SOLUTIONS Website Terms of Use_V1.0** sets out the basis on which any Personal Information (as defined in paragraph 2.2 below) that we collect from you, or that you provide to us, will be used, stored and processed by us. Any capitalized terms used in this privacy policy and that are not defined in this privacy policy shall have the meaning given to such terms in our terms and conditions IMPACTFUL SPECIALIST SOLUTIONS Website Terms of Use_V1.0.
- 1.2 We, IMPACTFUL SPECIALIST SOLUTIONS Proprietary Limited, a company incorporated in accordance with the laws of the Republic of South Africa, with registration number 1997/005978/, with registered address at 3rd floor, 34 Whitely Road, Melrose Arch, Johannesburg, Gauteng, 2196 ("**IMPACTFUL SPECIALIST SOLUTIONS**") are the "responsible party" for purposes of applicable data protection legislation in respect of all Personal Information you submit to us via the website <http://ImpactfulSpecialistSolutions.co.za/> ("**Website**") and/or in any correspondence and/or communication with us. Please see paragraph 7 below as it deals with Personal Information you submit to third parties.
- 1.3 We provide a collection of online resources which include payment automation, reconciliation, real-time reporting, regulatory compliance, training and support, risk management (collectively, the "**Services**") on the Website.
- 1.4 We recognize the importance of protecting your privacy in respect of Personal Information collected by us when you use the Website.

2. INFORMATION WE MAY COLLECT FROM YOU

- 2.1 When you visit the Website, we may collect certain information that is not Personal Information such as your Internet Protocol ("IP") address (see paragraph 6.1 below), operating system, browser type, and Internet service provider. This type of information does not identify you personally.
- 2.2 When you register on the Website, we may also collect Personal Information that you provide to us. For purposes of this Privacy Policy "**Personal Information**" shall mean any information of a personal nature by which you can be identified as an individual such as your name, postal address, email address, telephone number, home country, postal code, your fax number, gender, age, financial details and/or company name.
- 2.3 information that you provide by filling in forms on the Website. This includes information provided at the time of registering to use the Website, subscribing to our Services (which may include financial information), posting material or requesting further services;
- 2.4 information that we may ask you for if you enter any competition or promotion featured on our Website or if you report a problem with our Website and/or our Services;
- 2.5 if you contact us, we may keep a record of that correspondence;

- 2.6 we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- 2.7 details of transactions you carry out through our Website and of the fulfilment of any contract you enter into with us; and
- 2.8 details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise) and the resources that you access.
- 2.9 We may also collect information (which may include Personal Information) that our users provide, such as new or deleted postings, new or deleted comments, keyword searches, scam reports and new contact sellers.
- 2.10 The supply of your Personal Information is voluntary; however, you acknowledge that we cannot make certain Services available to you on the Website if you do not wish to supply such Personal Information.
- 2.11 We use a third-party credit card processing company for purchases, and other third-party companies to monitor website traffic, which may, in some instances, store your information, including the Personal Information you submit to such third parties.
- 2.12 By continuing to use this Website or the Service, you consent to processing, collection, storage, and use of the Personal Information you provide for any of the Services that we offer and for the purposes set out in this Privacy Policy, and you consent to our collection of any changes or updates that you may provide to any information you provide that is collected by us. If you do not agree to the Privacy Policy, please do not use the Website.
- 2.13 Where you provide us with Personal Information relating to a third-party data subject (for example, your customers and/or clients), you warrant that you have obtained all necessary consents from such data subject, including the data subject's consent for you to share such Personal Information with IMPACTFUL SPECIALIST SOLUTIONS to process on your behalf.

3. HOW YOUR INFORMATION IS USED AND DISCLOSED

- 3.1 We may use the information, including the Personal Information we hold about you for the following purposes:
 - 3.1.1 to ensure that content from our Website is presented in the most effective manner for you and for your computer;
 - 3.1.2 in aggregate form, for internal business purposes such as generating statistics and developing our strategic and marketing plans;
 - 3.1.3 to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
 - 3.1.4 to allow you to participate in interactive features of our Services, when you choose to do so;
 - 3.1.5 to carry out any contracts that may form between us;
 - 3.1.6 to respond to any queries, you make; and
 - 3.1.7 to notify you about changes to our Service;

3.1.8 to notify you of amounts payable for security, administrative or legal purposes, for helping us in any future dealings with you.

3.2 We may use information provided by you to:

3.2.1 enforce our Terms of Use, monitor user activity, such as keyword searches or new postings, and more effectively manage traffic on the Website;

3.2.2 provide customer services, create and manage user accounts; and

3.2.3 assist you with technical difficulties. Also, we may share with third-party service providers certain information, such as your browser capabilities or operating system, that we have collected in order to better understand which advertisements and services may interest you.

3.3 We will not use your Personal Information for any purpose (other than as stated above) without your express consent. We will not use or disclose your Personal Information to third parties without your consent, unless the use or disclosure is as intended on our website terms and conditions.

3.3.1 required in order to comply with applicable law, order of court or legal process served on IMPACTFUL SPECIALIST SOLUTIONS; and/or

3.3.2 disclosure is necessary to protect and defend the rights or property of IMPACTFUL SPECIALIST SOLUTIONS.

3.4 We will be entitled to disclose your Personal Information to those of our affiliates, agents, advisors, employees and/or third party service providers and suppliers (including payment providers) who assist us to interact with you via our Website, mobile communications and/or email, and thus need to know your Personal Information in order to assist us to communicate with you properly and efficiently. We will ensure that all such employees and/or third-party service providers having access to your personal information are bound by appropriate and legally binding confidentiality and non-use obligations in relation to your Personal Information.

3.5 On rare occasions, we may be required to disclose your Personal Information due to legal or regulatory requirements. In such instances, we reserve the right to disclose your Personal Information as required in order to comply with our legal obligations, including but not limited to complying with court orders, warrants, subpoenas, service of process requirements or discovery requests.

3.6 We may also disclose information about our users to law enforcement officers or others, in the good faith belief that such disclosure is reasonably necessary to enforce our terms and conditions IMPACTFUL SPECIALIST SOLUTIONS Website Terms of Use_V1.0 and/or this privacy policy, respond to claims that any content violates the rights of third-parties; or protect the rights, property, or our personal safety or the personal safety of our users or the general public.

4. PROTECTION OF YOUR PERSONAL INFORMATION

4.1 You are a valued customer, and we recognize that protecting your privacy is important to you. For this reason, we are committed to protecting the Personal Information you provide in a variety of ways.

- 4.2 We will:
- 4.2.1 treat your Personal Information as strictly confidential;
 - 4.2.2 take appropriate technical and organisational measures to ensure that your Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
 - 4.2.3 promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
 - 4.2.4 provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request; and
 - 4.2.5 upon your request, promptly return or destroy any and all of your Personal Information in our possession or control.
- 4.3 We will not retain your Personal Information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

5. STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

- 5.1 We will do our best to protect your Personal Information, and we will use technology that will help us to do this, however, the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your information transmitted to our Website. Any transmission of your information to our Website is entirely at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 5.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping that password confidential. Please do not share your password with anyone.
- 5.3 Our employees are trained in all aspects of web application security, including infrastructure vulnerabilities, cross-site scripting, secure data storage, and using the software development lifecycle to maintain and improve security. Our systems only allow access to authorised staff.
- 5.4 All transaction information entering IMPACTFUL SPECIALIST SOLUTIONS systems is encrypted using 256-bit SSL certificates. No information is ever passed unencrypted in a web browser to IMPACTFUL SPECIALIST SOLUTIONS. You can be completely secure in the knowledge that nothing you enter as part of a secure IMPACTFUL SPECIALIST SOLUTIONS transaction can be examined, used or modified by any third parties attempting to gain access to sensitive information.
- 5.5 We may, from time to time, transfer, store or host your Personal Information on servers outside of South Africa. We will at all times ensure that appropriate security safeguards are in place to secure and protect such personal information. Once on our systems, data is encrypted and securely stored in our dedicated hosting facilities at our data centre. IMPACTFUL SPECIALIST SOLUTIONS website services are hosted in the Vodacom Data Center providing a cost effective and robust environment for running highly available and scalable web sites. Application services are load balanced between different data centers (availability zones) ensuring high availability.

The cloud environment furthermore allows for easy auto scaling as traffic to the web site increases ensuring optimal performance.

- 5.6 In addition to real time replication of data to multiple data centers, up to three additional layers of backups are provisioned for. The network architecture within the data centre employs sophisticated controls and authentication technologies to protect business information as well as limit unauthorised access. We employ the industry-standard, 256-bit Secure Socket Layers (SSL) protocol through a certificate, to ensure information is neither intercepted nor corrupted during transmission over the internet. In addition, we use encryption technology to help protect data when stored on disk.

6. COOKIES AND IP ADDRESSES

- 6.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 6.2 We may use cookies to manage our users' sessions and to store preferences, tracking information, and language selection. Cookies may be used whether you register with us or not. "Cookies" are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time you visited the Website, your browsing history, your preferences, and your username.
- 6.3 In some instances, our third-party service providers may use Cookies on the Website. We cannot control, or access Cookies used by third party service providers. This Privacy Policy covers only Cookies used by us, and not any Cookies used by third parties.
- 6.4 Cookies enable us to:
- 6.4.1 estimate our Website's audience size and usage pattern;
 - 6.4.2 store information about your preferences, which allows us to customize the Website according to your individual interests;
 - 6.4.3 speed up your searches; and
 - 6.4.4 recognize you when you return to the Website.
- 6.5 You have the ability to either accept or decline the use of Cookies on your computer, whether you are registered with us or not. Typically, you can configure your browser to not accept Cookies. However, declining the use of Cookies may limit your access to certain features of the Website. For example, you may have difficulty logging in or using certain interactive features of the Website.

7. THIRD PARTIES

- 7.1 This Privacy Policy does not govern Personal Information provided to, stored on, or used by these third-party providers and Third-Party Websites. We recommend that when you enter a Third-Party Site, you review the Third-Party Website's privacy policy as it relates to how such third parties collect, process, store and protect your Personal Information.

8. GENERAL

- 8.1 You agree to provide accurate, truthful and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything. Failure to adhere to this requirement will entitle IMPACTFUL SPECIALIST SOLUTIONS *inter alia*, to terminate your use of the Website and/or Services.
- 8.2 You may request access to the Personal Information which we collect from you, including to rectify the information, or object to its processing by sending an email to us at impactful@lrmg.co.za. You also have the right to lodge a complaint with the information regulator if you think we are in breach of any applicable data protection legislation.
- 8.3 You may access, remove, review, and/or make changes to Personal Information that you have provided to us. If you register, we may send you certain notifications, advertisements, promotions, and specials. We may also send you any legally required notifications and certain notifications, including but not limited to, service related notices or notices regarding a change to any of our policies. For example, we may send you a notice regarding server problems or scheduled maintenance to the Website. In order to opt-out of receiving these notices, you may need to deactivate your account. You can opt out of certain e-mail communications from us, including our marketing and promotional communications.
- 8.4 If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the Protection of Personal Information Act ("**POPI**") or other data protection legislation it is not intended that any provision of this Privacy Policy contravenes any provision of POPI or other data protection legislation. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPI or other data protection legislation are complied with.

9. NOTIFICATION OF CHANGES

We reserve the right to change this Privacy Policy from time to time, and in our sole discretion. We may send you a notice regarding material changes to this Privacy Policy, but we encourage you to frequently check this Privacy Policy for any changes. Your continued use of the Website after any change in this Privacy Policy will constitute your acceptance of such changes.

10. HOW TO CONTACT US

If you have questions about this Privacy Policy, please contact us at info@lrmg.co.za with "Privacy Policy" in the subject line.