

## **WEBPAGE PRIVACY POLICY**

Winfield United South Africa (Pty) Ltd and all its subsidiaries and trading partners within the Winfield United South Africa Group of Companies are committed to protecting your Personal Information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your Personal Information, please contact us at [popia@winfieldunited.co.za](mailto:popia@winfieldunited.co.za).

This Privacy Policy governs the privacy policies and practices of our Website. Please read our Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us.

We last updated our Privacy Policy on 01 September 2023.

### **Information we collect:**

As a Visitor, you can browse our Website to find out more about us, our services and experience. You are not required to provide us with any Personal Information as a visitor. We collect your Personal Information when you choose to use the "Contact Us" feature to express an interest in obtaining information about us or our services or to enquire about any information on our Website. We ask for First Name, Last Name, Email Address and/or Mobile Number. If you Contact Us, you may also voluntarily share information related to you or your business. Generally, you control the type of information you provide to us when using our Website. The Personal Information that we collect depends on the context of your interaction with us and the Website, the choices you make and the products and features you use. The Personal Information we collect can include the following:

### **Automatically collected information:**

When you use our Website, we automatically collect certain computer information by the interaction of your mobile phone or web browser with our Website. Such information is typically considered non-personal information.

### **Cookies:**

Our website makes use of cookies and will be used to identify the areas of our website that you have visited. A cookie is a small piece of data stored on your computer or mobile device by your web browser. We use cookies to personalise the content that you see on our website. Most web browsers can be set to disable the use of cookies. However, if you disable cookies, you may not be able to access functionality on the website correctly or at all. We will never place Personally Identifiable Information in cookies.

### **Third-party tracking tools:**

We also use third party tracking tools to improve the performance and features of our Website. These third-party tracking tools are designed to collect only non-personal information about your use of our Website. However, you can understand that such tools are created and managed by parties outside our control. As such, we are not responsible for what

information is actually captured by such third parties or how such third parties use and protect that information.

### **Log information:**

We automatically receive information from your web browser or mobile device. This information includes the name of the website from which you entered our Website, if any, as well as the name of the website to which you're headed when you leave our website. This information also includes the IP address of your computer/proxy server that you use to access the Internet, your Internet Website provider name, web browser type, type of mobile device, and computer operating system. We use all of this information to analyse trends among our Users to help improve our Website.

### **We use the information we receive from you as follows:**

- To allow us to make contact based on the query you submit under "Contact Us".
- To customising our Website for your experience. We may use the information you provide to us along with any computer information we receive to customise our Website.
- For data aggregation purposes. We retain the right to collect and use any non-personal information collected from your use of our Website and aggregate such data for internal analytics that improve our Website and Service as well as for use or resale to others. At no time is your Personally Identifiable Information included in such data aggregations.

### **Transfer of your personal information:**

Your information, including Personal Information, may be transferred to, and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other Personal Information.

### **Disclosure of your personal information:**

If we are involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, we may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

**Retention of your personal information:**

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with the applicable laws), resolve disputes, and enforce our legal agreements and policies.

**Information regarding your data protection rights:**

Under the Protection of Personal Information (POPI) and the General Data Protection Regulation (GDPR) we are a Data Controller of your Personal Information.

If you are from the European Economic Area (EEA) or South Africa Area (RSA), our legal basis for collecting and using your Personal Information, as described in this Privacy Policy, depends on the information we collect and the specific context in which we collect it.

We may process your personal information because:

- We need to perform a contract with you, such as when you choose to engage with us for our services;
- You have given us permission to do so;
- The processing is in our legitimate interests and it's not overridden by your rights;
- For payment processing purposes;
- To comply with the law;
- If you are a resident of the European Economic Area (EEA) or South Africa Area (RSA), you have certain data protection rights. In certain circumstances, you have the following data protection rights;
  - The right to access, update or to delete the Personal Information we have on you;
  - The right of rectification;
  - The right to object;
  - The right of restriction;
  - The right to data portability; and
  - The right to withdraw consent.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local Data Protection Authority in the European Economic Area (EEA) or South Africa Area (RSA).

**Service providers:**

We may work with third-party companies and individuals to facilitate our Website ("Service Providers"), to provide our Website on our behalf, to perform Website-related services or to assist us in analysing how our Website is used. These third-parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics:**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

### **Links to third-party websites:**

Our Website may contain links to other websites that are not under our direct control. These websites may have their own policies regarding privacy. We have no control of or responsibility for linked websites and provide these links solely for the convenience and information of our visitors. You access such linked Websites at your own risk. These websites are not subject to this Privacy Policy. You should check the privacy policies, if any, of those individual websites to see how the operators of those third-party websites will utilise your personal information. In addition, these websites may contain a link to Websites of our affiliates. The websites of our affiliates are not subject to this Privacy Policy, and you should check their individual privacy policies to see how the operators of such websites will utilise your Personal Information.

### **Our email policy:**

We, as well as our affiliates, fully comply with national laws regarding SPAM. You can always opt out of receipt of further email correspondence from us and/or our affiliates. We agree that we will not sell, rent, or trade your email address to any unaffiliated third-party without your permission.

### **Updates to our privacy policy:**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this policy, we may notify you on our Website, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the "Last Updated" date at the beginning of this Privacy Policy. Any changes we make to our Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies.

**If you have any questions about our Privacy Practices or this Policy, please contact us.**

**PRIVACY AND INFORMED CONSENT NOTICE**  
**(EMAIL, WEBSITE AND SOCIAL MEDIA PRIVACY NOTICE)**

**POPIA Section 18 INFORMED CONSENT NOTICE**

**CONSENT TO PROCESS PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (POPIA)**

Please read this Notice before you enter/proceed to provide the required Personal Information to the Organization. By providing us with your Personal Information, you consent to the Organization, THE WINFIELD UNITED SOUTH AFRICA GROUP OF COMPANIES (and all of its trading partners and entities as part of the Group), processing your Personal Information, which Organization undertakes to process such personal information strictly in accordance with this section 18 informed consent document.

**1. INTRODUCTION**

- 1.1 The Organization is THE WINFIELD UNITED SOUTH AFRICA GROUP OF COMPANIES (and all of its trading partners and entities as part of the Group), and being a private Organization(s) established and duly registered in accordance with the Company laws of the Republic of South Africa, (hereinafter referred to collectively as the "Organization").
- 1.2 In terms of a law known as the Protection of Personal Information Act, Act No. 4 of 2013, (POPIA) everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one's Personal Information.
- 1.3 In order to give effect to this right, the Organization is under a duty to provide any person whose personal information is processed by it, known as a data subject, with a number of details pertaining to the use of and subsequent processing of the data subject's personal information, before such information is used or processed.
- 1.4 In accordance with this requirement, the Organization sets out below:
  - The reasons why it will be required to process a data subject's personal information;
  - The conditions under which it will receive and use a data subject's personal information;
  - How the Organization will use and handle this personal information; as well as
  - The conditions under which it will provide its own personal information.

**2. APPLICATION**

- 2.1 This is the privacy policy of the Organization, which is applicable to all the Organization's social media and electronic platforms, including websites and or email, whether owned by, established by, used by, hosted by and / or accessed

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by data subjects, which data subjects include, without detracting from the generality thereof, the Organization's entities, learners, Organization employees and staff, contractors and service providers and / or other third parties who may access and make use of the Organization's social media and electronic platforms.

2.2 This privacy policy furthermore applies to:

2.2.1 the data subjects who may make use of, or access the Organization social media and electronic platforms and all the processing of personal information by the Organization as a result of a data subject making use of, or accessing the Organization social media and electronic platforms except to the extent that a separate POPIA policy has been issued in respect of a specific service or product and related processing activities; and

2.2.2 all the personal information which is owned by the Organization and which is provided to any responsible parties and / or operators as a result of a data subject accessing or making use of the Organization social media and electronic platforms.

**3. ACCOUNTABILITY**

3.1 The Organization takes the privacy and protection of a data subject's personal information very seriously and will only process a data subject's personal information in accordance with POPIA and the terms of this privacy statement.

3.2 In turn where the Organization provides any of its personal information to a responsible party or operator, then such person will be required as a condition of receiving such information, to process such personal information in accordance with POPIA and the terms of this privacy statement.

3.3 Accordingly, the relevant data privacy principles relating to the processing of personal information, whether that belonging to the Organization or that belonging to a data subject (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will apply without exception, save where POPIA provides for such an exception, to all and any personal information provided by the Organization to another or received by the Organization as a result of the use of the Organization email, and / or social media and electronic platforms.

**4. AGREEMENT TO BE BOUND AND CONSENT TO PROCESS**

4.1 By accessing or using the Organization website and URL's, any sites housed under its domain names and / or social media platforms, and / or when sending or receiving emails using the Organization email, the data subject;

4.1.1 Acknowledges that it has read and understood this section 18 informed consent notice and related provisions;

4.1.2 agrees to be bound by this section 18 informed consent notice and the privacy policy;

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- 4.1.3 agrees to comply with this section 18 informed consent notice and privacy policy; and
- 4.1.4 gives the Organization consent to process and further process the required personal information in accordance with this section 18 informed consent notice.

**5. RECEIPT, USE AND SHARING OF PERSONAL INFORMATION BY THE ORGANIZATION**

- 5.1 The Organization will receive personal information pertaining to a data subject when the data subject submits a query or request via the Organization website, or by way of email, telephone or via social media.
- 5.2 On receipt of the request or query, the Organization will thereafter use and process the data subject's personal information for a variety of purposes, depending on the query or request, which without detracting from the generality thereof may include:
  - for the purposes of identifying and / or verifying the data subject's details;
  - for the purposes of providing information, products and / or services that the data subject, may have requested;
  - for employment application purposes;
  - for the purposes of managing any information pertaining to the data subject;
  - for general administration purposes;
  - for legal or contractual purposes;
  - to help the Organization improve the quality of the Organization products and services;
  - to help the Organization detect and prevent fraud and money laundering;
  - for the purposes of recovering unpaid fees and / or any other amount due to the Organization;
  - for the purpose of debt collection;
  - for the purposes of research, analytical and statistical purposes;
  - for the purpose of carrying out analysis of customer profiling;
  - for the purposes of identifying other products and services which might be of interest to the data subjects;
  - for the purposes of informing a data subject about the Organization products and services.
- 5.3 In order to correctly handle any request or query, and in order to perform the purposes described above, the Organization may from time to time share a data subject's personal information with the following parties:
  - the Organization employees, which will only be done on a need-to-know basis;
  - the Organization carefully selected business partners who provide products and services which may be of benefit to a data subject which will only be done on a need-to-know basis; and
  - the Organization operators such as service providers and agents who perform services on our behalf which will only be done on a need-to-know basis and in terms of an operator agreement.

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- 5.4 The Organization does not share a data subject's personal information with any third parties who have not been described above, unless:
- the Organization is legally obliged to provide such information to another for legal or regulatory purposes;
  - the Organization is required to do so for purposes of existing or future legal proceedings;
  - the onward transmission or sharing of personal information is necessary for the pursuance or protection of the Organization's legitimate interests or that of the data subject or a third party;
  - the Organization is involved in the prevention of fraud, loss, bribery or corruption and is using another agent or service provider under a mandate to provide such service,
- and under all of the abovementioned circumstances, the Organization will take reasonable measures to ensure that such personal information is only provided to the recipient if such recipient undertakes to keep the information confidential and secure.
- 5.5 Where the Organization has to transfer the data subject's personal information across the South African borders, it will ensure that before it does so, that it will ensure that the recipient thereof agrees to be bound by POPIA under and in terms of a set of binding corporate rules or binding agreements that provide an adequate level of protection and uphold the principles for the reasonable and lawful processing of such personal information.

## 6. RECEIPT, USE AND SHARING OF THE ORGANIZATION PERSONAL INFORMATION

- 6.1 The Organization on receipt and in response to a query or request received from a data subject, referred to under section 5 above, will transmit via its website, or by way of email, telephone or via social media, its own personal information, which personal information on receipt by the requesting or receiving data subject may only be used for the purpose relating to the initiating of the request or query and for no other purpose. Furthermore, the recipient undertakes that it will not share this information with any other party, or save it only where it has been given express permission to do so by the Organization.

## 7. INFORMATION QUALITY / OPENNESS / DATA SUBJECT PARTICIPATION

- 7.1 Whilst the Organization will make every effort to ensure the integrity and accuracy of a data subject's personal information, this may not at all times be possible. Following this, the data subject accepts the responsibility for keeping its / her or his information up to date, and undertakes to inform the Organization of any changes to its / his or her personal information. This can be done by accessing the prescribed change of details form on the Organization's website / Legal Notices Page and submitting same to the Organization's Information Officer.
- 7.2 A data subject has a right of access to any personal information which the Organization may have and where applicable may ask the Organization to correct

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any inaccuracies in or to any such personal information. This request must be done by way of a formal Organization PAIA process, which is accessible on the Organization's website / Legal Notices Page. A data subject may contact the Organization's Information Officer at the following address: [popia@winfieldunited.co.za](mailto:popia@winfieldunited.co.za) should you have any questions, complaints or objections regarding the processing of its personal information.

## 8. SECURITY OF PERSONAL DATA

- 8.1 The Organization makes all reasonable efforts to keep its website secure at all times, however advise that it cannot guarantee the security of any information provided to us or by us through the Organization website, email, internet or social media sites. The Organization cannot be held responsible for any loss or unauthorized use or interception of information transmitted via these sites, such as the internet which is beyond the Organization's reasonable control.
- 8.2 The Organization website may contain links to other websites outside of the Organization control. The Organization is not responsible for the content, privacy or security of these other third party-controlled websites.
- 8.3 The Organization currently does not make use of cookies on its website. The Organisation may opt to do so at any time in the future for purposes of bettering its website and services, in which instance a clear notice in this regard will be displayed on the website. Should we make use of cookies, a data subject may change these cookie settings by accessing the relevant settings. When the settings are not amended or changed, the Organization will accept that you are happy that these cookies access and make use of your details.
- 8.4 The Organization may make use of social plug-ins of social networks such as Facebook, YouTube, LinkedIn, Google+ and Twitter. Please note that the Organization has no influence on or control over the extent of the data retrieved by the social networks' interfaces and the Organization can accordingly not be held responsible or liable for any processing or use of personal information transmitted via these social plug-ins. For information on the purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for the protection of your private sphere, please refer to the data protection information provided by the social network in question.
- 8.5 Note that all Telephone calls may be recorded and / or monitored for security and quality assessment purposes.
- 8.6 Subject to the provisions above, the Organization has implemented the appropriate technical and organizational security measures which are required in order to protect all personal data which it holds from and / or against unauthorized access, accidental or wilful manipulation, loss or destruction.

## 9. THIRD PARTY INFORMATION AND THAT BELONGING TO MINORS

- 9.1 If a data subject provides the Organization with personal information on behalf of another, the Organization will not be able to process the query or request unless

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such query or request is accompanied by the required permission and consent from the third party to process the third party's personal information.

9.2 If a data subject is under the age of 18, such person's personal information will only be processed if the minor's parent or legal guardian gives the required consent or permission to the processing.

## 10. CONTACT DETAILS

10.1 You can contact the Organization in relation to this Privacy policy by writing to us at [popia@winfieldunited.co.za](mailto:popia@winfieldunited.co.za) or by phoning our office number.

## 11. REVISION OF POLICIES

11.1 We reserve the right to and may from time to time update this Privacy Notice. Any such revision will be published as an amended version on our website. Any change to this Policy will be posted as an updated version and readers are advised to visit and re-read this policy on a regular basis.

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