



iTEAM (PTY) LIMITED
Registration Number: 2005/009979/07

PRIVACY NOTICE

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1. INTRODUCTION

- 1.1. ITEAM (Pty) Limited (hereafter “ITEAM” or “we” or “us” or “our”) respects your privacy and protection of your personal information is important to us. We are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.
- 1.2. This Privacy Policy, together with the ITEAM PAIA and POPIA manual, aim to let you know how ITEAM will treat any personal information that it may have about you and how you can access such personal information held. Reference made to “PAIA” means the Promotion of Access to Information 2 of 2000 as amended and reference made to “POPIA” means the Protection of Personal Information Act 4 of 2013.
- 1.3. By visiting our website, communicating electronically with us and using our products and services, you consent to the processing and transfer of your personal information as set out in this privacy policy. ITEAM will take all reasonable measures, in accordance with this policy, to protect your personal information and to keep it confidential.
- 1.4. For purposes of this privacy policy, “personal information”, “data subject” and “processing” will have the meanings given to them in the POPIA.
- 1.5. We may collect website usage information using “cookies” which allows us to collect standard internet visitor usage information.
- 1.6. We reserve the right to amend this Privacy Policy at any time, without prior notice, by posting the amended policy on our website. Please visit our website and this Privacy Policy frequently to stay informed about how we use your personal information.

It is important to note that if you do not provide the required or necessary Personal Information to us, we may not be able to provide you with our goods and/or services.

2. APPLICATION OF THE PRIVACY POLICY

- 2.1. Our privacy practices apply to the processing of your personal information collected by us or on our behalf, such as data subjects who make use of our website and/or our products and services, and/or who provide us with products and services, customers and any other data subjects who engage with us.
- 2.2. This privacy policy covers both our online and offline data collection activities, including personal information that we collect through our various channels such as websites, apps, third-party social networks, consumer engagement services, points of sale and events. Please note that we might aggregate personal information from different sources and across different devices. As part of this, we combine personal information that were originally collected by different ITEAM divisions or ITEAM partners.
- 2.3. This privacy policy does not apply to third party websites linked to our website, or websites that link to or advertise on our website.

3. COLLECTION OF PERSONAL INFORMATION

- 3.1. The personal information may be provided to us by you and/or collected by us when you engage with us and/or on your use of our products and services, and/or when you provide us with your products and services, and/or when you access our website or from third parties (such as regulators).
- 3.2. We will also collect your information where you have partially completed and/or abandoned any information which you began to apply to our website and/or other online forms. We may use this information to contact you to remind you to complete outstanding information.
- 3.3. The type of personal information we collect will depend on the purpose for which it is collected and used. The specific purpose for which the information is collected will be apparent from the context in which the information is requested including but not limited to when:

- 3.3.1 You purchase and/or use our products and services. Any information that we need to fulfil an order or requirement for a service or product, or that you use to make a purchase, such as your debit details or other forms of payment, expiration dates, shipping and billing address, location data and other sensitive personal information, but which processing will always be done in accordance with applicable laws.
- 3.3.2 You submit enquiries to us or contact us and you may be required to provide your name and surname, identification, or passport number, postal or street address, title, contact numbers or e-mail address, for yourself or the company you transact on behalf of.
- 3.3.3 You make use of our website or interact with us on social media, we may collect your non-personal browsing habits and click patterns, e-mail address, IP address, telephone data information or username and password.
- 3.3.4 You apply for employment opportunities at ITEAM, you may be required to provide your name and surname, identity number, employment history, and criminal behaviour.
- 3.3.5 You visit our premises where CCTV cameras are installed.
- 3.3.6 We will only retain your personal information for as long as necessary for the fulfilment of those purposes as have been identified by us and/or as required by law and/or as agreed with you.

4. HOW WE USE YOUR INFORMATION

- 4.1. Personal information will only be processed for the purposes for which it was collected and/or to comply with legal and regulatory obligations and/or as authorised by law and/or with your consent.
- 4.2. In certain instances, we may need to consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, and it will not affect the processing of your personal information where consent is not required.
- 4.3. The purposes for which we process personal information, which should be read in conjunction with our PAIA and POPIA manual includes, but is not limited to:
 - 4.3.1. To respond to your enquiry;
 - 4.3.2. To meet our contractual obligation with you or take steps necessary for the conclusion of a contract with you;
 - 4.3.3. To conduct affordability assessments, credit assessments and credit scoring;
 - 4.3.4. To open, manage and maintain customer and supplier accounts or relationships with iTEAM;
 - 4.3.5. To provide services or products to you;
 - 4.3.6. For purposes of online login and authorization;
 - 4.3.7. To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators;
 - 4.3.8. To market or promote our services and products;
 - 4.3.9. For safety and security reasons, including but not limited to, the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of iTEAM's policies;
 - 4.3.10. For quality control and risk analysis reasons;
 - 4.3.11. To record and/or monitor and have access to your telephone, correspondence and electronic communications to/with us (or any of our employees) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 4.3.12. To maintain the security of our digital channels and systems;
 - 4.3.13. For audit and record-keeping purposes;
 - 4.3.14. To enforce and collect on any agreement with a customer or supplier in default or breach of the terms and conditions of the agreement, such as tracing a contact, or to institute legal proceedings against the parties to the contract;
 - 4.3.15. To process job applications;
 - 4.3.16. In the event of a merger or acquisition of the Company;
 - 4.3.17. To compile non-personal statistical information about browsing habits, click-patterns and access to the ITEAM website and third-party social networks.

5. DISCLOSURE OF INFORMATION

- 5.1. ITEAM may disclose your personal information to third parties in certain circumstances, which include, but are not limited to:
 - 5.1.1 Where we have your consent.
 - 5.1.2 Where we are required to do so by law:
 - To comply with any relevant legislation;
 - To comply with any legal process; and
 - By comply with any regulatory authority
 - 5.1.3 Where processing is necessary to carry out actions for the conclusion or performance of a contract to which you are a party.
 - 5.1.4 Where there is a legitimate reason to do so.
- 5.2. Third parties who we disclose personal information to include, but are not limited to:
 - 5.2.1 Our third-party service providers (including their sub-contractors) who are involved in the delivery of network and data services (example our upstream providers);
 - 5.2.2 Other third parties in relation to the purposes set out under Section 4 (How we use your information);
 - 5.2.3 Other public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention;
 - 5.2.4 Any iTEAM employee, subsidiary or related company for the purposes set out in this Privacy Policy.
 - 5.2.5 Accredited debt collection agencies.
 - 5.2.3 Regulators, courts, tribunals and law enforcement agencies.
- 5.3. We may compile, use and share any information that does not relate to any specific individual and retain all rights to non-personal statistical information collected and compiled by us.

6. TRANSFER OF INFORMATION

- 6.1. We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with similar protection as provided for in the POPIA.
- 6.2. We may transfer your information to other countries which do not have similar protection as provided for in the POPIA, with your consent.

7. INFORMATION SECURITY

- 7.1. We take appropriate and reasonable technical and organisational measures to prevent any unauthorised or unlawful access, loss of, damage to or unauthorised destruction of personal information.
- 7.2. We have implemented various policies, procedures and standards to safeguard personal information.
- 7.3. We regularly verify that the safeguards are effectively implemented and ensure that they are continually updated in line with best practice.
- 7.4. ITEAM has implemented procedures to address actual and suspected data breaches, and undertake to notify you and the relevant regulatory authorities of breaches in instances in which ITEAM is legally required to do so and within the period in which such notification is necessary.
- 7.5. Notwithstanding paragraph 7.1 to 7.3 above, to the extent permissible by law, we shall not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of your personal information.

- 7.6. It is important that you also play a role in keeping your personal information safe and secure. When signing up for an online account, please ensure your password would be difficult for others to guess and never reveal your password to anyone else. You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. We cannot guarantee the security of any information you transmit to us online and you do so at your own risk.
- 7.7. Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

8. DATA SUBJECT RIGHTS

Subject to the POPIA provisions, you have the right to:

- I. Request access to your personal information.
- II. Request, where necessary, the correction, destruction or deletion of your personal information.
- III. Object to the processing of your personal information.
- IV. Submit a complaint to the Information Regulator regarding the alleged interference with the protection of the personal information.
- V. Institute civil proceedings regarding the alleged interference with the protection of your personal information.

Details on how to make a request is documented in our PAIA and POPIA manual.

9. MARKETING

Where you provide your personal information to iTEAM in the context of the sale of our services, you agree to iTEAM sending you information on news, trends, services and events, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from iTEAM at any time by contacting sales@iteam.co.za

10. WHEN YOU PROVIDE US WITH INFORMATION ABOUT OTHERS

If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under POPIA in relation to such disclosure. In so far as required by applicable POPIA, you must ensure that you have provided the required notices and have obtained the individual's consent to provide us with his/her/its personal information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read the Privacy Policy.

11. CHILDREN'S PRIVACY

Our services do not address anyone under the age of 18 ("Child/Children") and we will not knowingly solicit or collect Personal Information from Children. If we discover that we have unintentionally collected Personal Information from a Child, we will remove that Child's Personal Information from our records promptly.

12. USE OF COOKIES

- 12.1. iTEAM may use "cookies" to enhance your experience as a customer (referred to as the "user"). The user's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. The user may choose to set their web browser to refuse cookies, or

to be notified when cookies are being sent. If the user does so, note that some parts of the website service may not function properly.

12.2. ITEAM collects, stores and uses the abovementioned information for the following purposes:

- 12.2.1. To communicate requested information to the User.
- 12.2.2. To provide services to the User as requested by the User.
- 12.2.3. To authenticate the User;
- 12.2.4. To provide the User with access to restricted pages on this website.
- 12.2.5. To compile non-personal statistical information about browsing habits, click-patterns and access to the ITEAM website.

12.3. Information detailed above is collected either electronically by using cookies or is provided voluntarily by the User. Users may determine cookie use independently through their browser settings. For purposes of this clause, a cookie means a small computer file created by a web browser to save user information for web site.

12.4. Cookies ensure that ITEAM is able to continually improve its website. We utilise "first party cookies" (originating from us) to simply track the user's visits between sessions and deliver a more personalised experience. We also utilise "third party cookies" (not originating from us) to provide traffic analysis and tracking.

13. CONTACT DETAILS

Any comments, questions or suggestions about this Privacy Policy, or our handling of your personal information can be emailed to legal@iteam.co.za

Alternatively, you can contact us at 087 500 0000

Or by post:

The Information Officer

22 Chislehurst Road

Westville

Durban

3629

Should you believe that iTEAM has utilized your personal information contrary to the directives of POPIA, you undertake to first attempt to resolve any concerns with iTEAM by address a complaint in writing to the iTEAM Information Officer's email address provided above. If you are not satisfied with the outcome of such process, you have the right to lodge a complaint with the Information Regulator.

14. INFORMATION REGULATOR

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

Physical address:	JD House, 27 Stiemens Street Braamfontein Johannesburg 2017
Postal address:	P.O.Box 31533, Braamfontein, Johannesburg, 2017
Email:	enquiries@inforegulator.org.za
Website:	https://www.inforegulator.org.za
Tel:	010 023 5200