

 msb management	Policy / Procedure Name: POPIA Policy	Version number: GEN 18.12
Last Review Date: 2021/06/25	Department: All Departments	Approved By: Management

POPIA POLICY

Introduction

We are MSB Management Services (Pty) Ltd (Registration number 2016/210660/07), and this is how we will be protecting your and other data subjects' privacy. We respect privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**). When we refer to "your" we include the aforesaid natural or juristic persons (data subjects).

Definitions

MSB Management Services (Pty) Ltd, a private company, with limited liability, duly registered and incorporated as such in accordance with the laws of the Republic of South Africa. We offer education and related services to our various clients.

"MSB" means MSB Management Services (Pty) Ltd,

"this website" means www.msbmanagement.co.za

"user" means any person accessing any part of this website

"POPIA" means the Protection of Personal Information Act No. 4 of 2013

"Personal Information" means Personal Information as defined in POPIA.

"Learner" means a natural or juristic person whose information is provided to us by our clients for educational purposes.

"Data subject" means a natural or juristic person to whom the personal information relates.

"Client" means a natural or juristic person who has contractually mandated us to assist with education.

Application

This policy applies to you if you are:

- a visitor to our website;
- a learner; or
- a client who has requested the services that we provide.

Personal Information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration;
- certain information provided to us by our clients;
- certain information collected on submission; and
- optional information that you provide to us voluntarily;

But Excludes:

- information that has been made anonymous so that it does not identify a specific person;

- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Common Examples

Common examples of the types of personal information which we may collect and/or are provided with and process include:

- **identifying information** – such as a name, date of birth, or identification number;
- **contact information** – such as a phone number or email address;
- **address information** – such as a physical or postal address; or

Sensitive personal information

Depending on the circumstances, we may also collect and/or are provided with sensitive personal information including your:

- **employment information** – the information your employer provides us.

Acceptance

Acceptance required

You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then you may not request our services.

Legal capacity

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you are legally permitted to do so.

Information received from clients

Our clients lawfully provide us with information of learners to assist with education. We are contractually mandated to assist them as they have a legitimate interest in this regard.

This personal information may include (but is not limited to):

- name and surname;
- email address;

- telephone number;
- company name, company registration number, and VAT number;
- postal address or street address; and
- financial information

Collection information

On registration

Once you register for our services (as a client), you will no longer be anonymous to us. You will provide us with certain personal information about yourself and/or other data subjects.

This personal information may include (but is not limited to):

- name and surname;
- email address;
- telephone number;
- company name, company registration number, and VAT number;
- postal address or street address; and
- username and password.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

On order or request

When you request our services from us, you will be asked to provide us with additional information on a voluntary basis (**services information**).

From browser

We may automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, color capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

Contractual mandate

We may collect further information from a learner to assist us in delivering our services.

Cookies

Cookies are small pieces of information sent to the user's browser and stored on the user's hard drive. Temporary or session cookies expire and are deleted when the browser is closed. Cookies by themselves cannot be used to personally identify users. If necessary, users can alter the manner in

which their browser handles cookies. We may place 'cookies' on your device when you visit our websites.

Purpose of collection and/or receipt

We may use or process any services information, or optional information that you provide to us, or is provided to us, to enable and facilitate education. Processing includes gathering personal information, disclosing it, and combining it with other personal information. We generally collect, receive and process personal information for various purposes, including:

- **services purposes** – such as providing our services;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

Disclosure

We may share personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications;
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- other third parties who provide us with relevant services where appropriate.
- employees that require the personal information to do their jobs

Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. All reasonable measures are taken to ensure the security and integrity of information submitted to this website and/or received.

Accurate and up to date

We will try to keep the personal information we collect and/or are provided with as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information.

Retention

We will only retain your personal information for as long as it is necessary, unless retention of the record is required or authorised by law. During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information. We may retain your personal information in physical or electronic records at our discretion.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

Updating or removing

If you are a client, you may choose to correct, update or remove the personal information you have submitted to us, by contacting us by phone or email. Should you be a learner, we will escalate it accordingly. Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Should you require further information kindly contact us on legal@vericred.biz. If you would like to lodge a complaint with the Information Regulator, visit: <https://www.justice.gov.za/infoereg/> for guidance.