

PRIVACY POLICY

IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (POPI)

CONTENTS

- 1. Introduction**
- 2. Who We Are**
- 3. The Information we Collect**
- 4. How we use Your Information and Access**
- 5. Disclosure of Personal Information**
- 6. Personal Information Security**
- 7. Access to Your Personal Information**
- 8. Correction of Your Personal Information**
- 9. Definition of Personal Information**
- 10. Changes to this Notice**
- 11. How to Contact Us**
- 12. Additional Laws**

1. Introduction

We recommend you read this Policy so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By providing us with your personal information, you acknowledge that you have reviewed the terms of this Policy (the “Policy”) and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to proceed and not to provide us with any personal information. This Policy forms part of our Terms and Conditions and such shall be governed by and construed in accordance with the laws of South Africa. This Policy explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At Brocoded we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully, and openly.

2. Who We Are

BroCoded is a South African-based company. Our high converting website design solutions are the driving force your business needs to expand successful marketing efforts. With multiple website design packages, we have a solution that will suit your need. We create E-commerce / online store solutions on multiple platforms such as WooCommerce (WordPress) that give you the flexibility to create the perfect online selling solution for your products and services. Your website is your #1 marketing tool. Search Engine Optimization done by us will ensure your local and target markets find you on Google and other search engines. We offer Google Ads management with Google My Business setups and more

The Information We Collect

2.1 Collection of Personal Information

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you when you provide us with your personal details, for example, when you purchase a product or service from us, when you make a booking or when you submit enquiries to us or contact us. Where possible we will inform you of what information you are required to provide to us and what information is optional.

We will ask you when we need information that personally identifies you (personal information) or allows us to contact you.

Examples of information we collect from you are:

- Name.
- Address.
- Email address.
- Telephone/Cell number.
- Company details.

We also collect information about you from other sources as explained below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in a similar industry to offer you a more consistent and personalised experience in your interactions with BROCODED.

BROCODED occasionally allows other companies to offer our registered customers information about their products and services. If you do not want to receive these offers, you

may select the option stating that you do not wish to receive marketing materials from third parties.

2.2 Collection of Non-Personal Information

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this information, and it is only used to assist us in providing an effective service on this website. We may from time-to-time supply third parties with this non-personal or aggregated data for uses in connection with this website.

3. How We Use Your Information and Access

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes.
- To carry out our obligations arising from any contracts entered between you and us.
- To notify you about changes to our service.
- For market research purposes.
- To assist with business development.
- For the detection and prevention of fraud, crime, or other malpractice.
- To conduct market or customer satisfaction research or for statistical analysis.
- For audit and record keeping purposes.
- In connection with legal proceedings.
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
- For monitoring and auditing site usage.
- To evaluate the use of the site, products, and services.
- To analyse the effectiveness of our advertisements, competitions, and promotions.
- To personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it.
- To make the site easier to use and to better tailor the site and our products to your interests and needs.
- To help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time.

- To collect information about the device you are using to view the site, such as your IP address or the type of internet browser or operating system you are using and link this to your Personal Information to ensure that the site presents the best web experience for you.
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us, and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- To suggest products or services (including those of relevant third parties) which we think may be of interest to you.
- To offer you the opportunity to take part in competitions or promotions.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.
- To respond to your queries or comments.
- Where we collect Personal Information for a specific purpose we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.

We occasionally hire other companies to provide limited services on our behalf, including packaging, mailing and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

4. Disclosure of Personal Information

We may disclose your Personal Information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your Personal Information with, and obtain information about you from:

- third parties for the purposes listed above;
- other companies in a similar industry when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing;
- other third parties from whom you have chosen to receive marketing information.

BROCODED will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- conform to the edicts of the law or comply with legal process served on BROCODED.
- protect and defend the rights or property of BROCODED.
- act in urgent circumstances to protect the personal safety of clients or the public.

5. Personal Information Security

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of Personal Information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- physical security.
- computer and network security.
- access to Personal Information.
- secure communications.
- security in contracting out activities or functions.
- retention and disposal of information.
- acceptable usage of Personal Information.
- governance and regulatory issues.
- monitoring access and usage of private information.
- investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that Personal Information for which we remain responsible is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to do.

BROCODED has taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honoured. We take strong precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

Your personal information is never shared outside the company without your permission, except under conditions explained above. Inside the company, data is stored in password-

controlled servers with limited access. Your information will be stored and processed in South Africa only.

6. Access to your Personal Information

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your Personal Information.

We will provide you with the means to ensure that your personal information is correct and current. You may request your personal information be validated by sending us an email to info@drspence.co.za. We will then update this information should any of it be wrong. You can then:

- Review and edit personal information you have already given us.
- Tell us whether you want us to send you marketing information, or whether you
- want third parties to send you their offers by postal mail.

7. Correction of your Personal Information

You have the right to ask us to update, correct or delete your Personal Information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up to date by notifying us of any changes, we need to be aware of.

8. Definition of Personal Information

According to the POPI Act “**Personal Information**” means information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link: <https://www.gov.za/documents/protection-personal-information-act>

9. Changes to this Notice

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

10. How to Contact Us

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your Personal Information, please contact us by email at

rudie@brocoded.com or info@brocoded.com. Be certain the words Privacy Policy are in the Subject line.

11. Additional Laws

We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected or to obtain access to your own information without having to use the request for access to information procedure in terms of Promotion of Access to Information Act, 2002 ("PAIA"). Any other information required will need to be obtained in accordance with the access to information procedure as set out in PAIA.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

Your attention is drawn to the definition of Personal Information contemplated in section 1 of POPI (as may be amended from time to time) and that you are permitted to make a complaint to the Information Regulator in the event of any interference with the protection of your Personal Information. The contact details of the Information Regulator are:

Complaints e-mail : complaints.IR@justice.gov.za
General enquiries e-mail : inforeg@justice.gov.za