

1<sup>st</sup> floor, Tijger Park 2  
No. 51 Willie van Schoor Drive  
Bellville, Western Cape  
South Africa  
7530

<b>POLICY</b>	<b>PRIVACY POLICY: PERSONAL INFORMATION</b>		
<b>EFFECTIVE DATE</b>	9 June 2021	<b>VERSION NO.</b>	01

Any reference to Maserumule, includes both Maserumule Consulting Learning Organisation Growth (Pty) Ltd t/a Maserumule Corporate Employment Law, registration number 2001/004653/07 and Maserumule People Solutions t/a Maserumule Growth Solutions, registration number 2006/023848/07.

## 1. POLICY STATEMENT

This Privacy Policy governs the manner in which we process your personal information. It is designed to inform you of the types of information we collect from data subjects, how we use that information and the circumstances under which we will share it with third parties.

We respect your privacy and your personal information and for these reasons, we take all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential as envisaged by the Protection of Personal Information Act 4 of 2013 ('POPI').

## 2. WHAT IS PERSONAL INFORMATION?

Personal information refers to information that identifies or relates specifically to you, for example, your race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience belief culture language and birth. Information relating to your education or the medical, financial, criminal or employment history, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment, together with biometric information, personal opinions, views or preferences also falls within the very broad definition. In addition, correspondence is also included.

### **3. COLLECTION OF INFORMATION**

Maserumule collects personal information in various instances, including when:

- data subjects contact Maserumule or request information or services;
- Maserumule provides services to data subjects;
- persons apply for employment at Maserumule;
- persons use Maserumule's websites (all websites that we own and operate)
- persons who engage with Maserumule through social media.

Maserumule may collect the information directly from a data subject or from third parties.

The majority of information we collect directly from the data subject. We might also collect personal data from other sources, such as publicly available materials or trusted third parties like our marketing and research partners, including Google, Facebook and LinkedIn. This information is used to supplement the personal data we already hold about the data subject, in order to better inform, personalise and improve our services, and to validate the personal data the data subject provides.

### **4. PURPOSE FOR PROCESSING PERSONAL INFORMATION**

Maserumule may process personal information:

- to provide services to clients;
- to manage our relationship with clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

Maserumule processes personal information for various purposes, including for:

- engaging in various forms of direct marketing;
- facilitating transactions with data subjects;
- collecting data for statistical purposes to improve its services;
- fulfilling its contractual obligations to its clients and client contacts;
- complying with the provisions of statute and regulations;
- attending to the legitimate interests of data subjects;
- identifying prospects for enhanced service delivery and business sustainability;
- tracking data subject activity on the website and its links as well as their transactions with Maserumule
- confirmation and verification of data subject identity or verifying that they are authorised users for security purposes;
- conducting market or customer satisfaction research;
- auditing and record keeping purposes; and
- legal proceedings.

## **5. LAWFUL BASIS**

In respect of the processing of personal as provided for above, Maserumule will adhere to the conditions for the lawful processing of personal information, based on its desire to provide data subjects services in their best interests as well as a legitimate interest of Maserumule to achieve its business objectives.

## **6. RETENTION OF PERSONAL INFORMATION**

Maserumule retains personal information for as long as may be reasonably necessary in accordance with applicable law.

## **7. SHARING AND TRANSFER OF PERSONAL INFORMATION**

Maserumule may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

- if Maserumule is required or authorised to do so by law or a court order;
- in order for Maserumule to enforce its rights;
- in order for Maserumule to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies;
- advocates and other parties involved in legal services;
- medical specialists;
- third party service providers to Maserumule or its clients; and
- third parties who provide research services to Maserumule or its clients.

We require the aforementioned third parties to take appropriate, reasonable technical and organisational measures to keep your personal information secure.

There is a possibility that the personal information that we collect from you may have to be transferred to, and stored at, a destination outside of the Republic of South Africa (for example, by a third-party data hosting service provider).

Insofar as your information may be transferred outside of South Africa, we will take reasonable organisational and/or contractual measures to ensure that your personal information is processed by such third party service providers for the purposes for which it has been provided to us and that the required levels of protection have been implemented by such third party service providers to safeguard your personal information.

## **8. SECURITY**

We will take all appropriate, reasonable technical and organisational measures to safeguard your personal information to prevent loss of, damage to or unauthorised destruction of your personal information or unlawful access to or processing of your personal information. Our technical and organisational personal data security measures include:

- the storage of your personal data under password-secured databases;
- the restriction of access to your personal data to specific staff/personnel who are designated and mandated to manage your personal data;
- the restriction of access to all our premises where your personal data is stored in physical or digital form; and
- the binding of any third parties who handle your personal data to confidentiality obligations with respect to the same.

## **9. OUR WEBSITE AND SOCIAL MEDIA PLATFORMS**

With each visit to our Website, we may automatically collect and store certain information about you. This includes, but is not limited to the following:

- Technical information, including your Internet Protocol (IP address) which is used to connect your computer to the internet, operating system, browser type and platform for system administration; and
- Information about your use of our Website including details of your visits such as pages viewed and the resources that you accessed. Such information includes traffic data, location data and other communication data.

Maserumule uses Google Analytics to collect site traffic statistics. Analytics tracks and reports website traffic. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of Google Analytics by installing the Google Analytics opt-out browser add-on.

For more information, please visit the Google Privacy & Terms. <https://policies.google.com/>

## **10. COOKIES**

Maserumule's website makes use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor's experience on the website and facilitating their use of the website.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log onto our website. If you accept a “cookie” or fail to deny the use of “cookies”, you agree that we may use your personal information collected using “cookies” (subject to the provisions of this Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of our website.

## **11. EMBEDDED CONTENT FROM OTHER WEBSITES**

Articles on our website may include embedded content. Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

This website uses a “visitor action pixels” from Facebook and LinkedIn that tracks user behaviour after they have been redirected by clicking on a Facebook or LinkedIn ad. This enables us to measure the effectiveness of Facebook and LinkedIn ads for statistical and market research purposes. The data collected in this way is anonymous to us. We do not see the personal data of individual users. However, this data is stored and processed by Facebook and LinkedIn. A cookie may also be stored on your computer for these purposes. Facebook and/or LinkedIn may link this information to your Facebook and/or LinkedIn account and also use it for its own promotional purposes, in accordance with their Data Usage Policy. <https://www.facebook.com/policy.php>; <https://www.linkedin.com/legal/privacy-policy>

## **12. IP ADDRESSES**

We also collect information that does not identify you personally through our Internet log files, which record data such as IP addresses, browser types and other anonymous statistical data. This information may be used to analyse trends and to gather general demographic information. We do not link this information to personally identifiable information.

## **13. DIRECT MARKETING**

Maserumule may send marketing and promotional communications and material to persons. Recipients may opt out from receiving such communications by contacting Maserumule at the details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

## **14. DATA SUBJECT RIGHTS**

Data subjects have the right to request that Maserumule provide them with access to their personal information, to rectify or correct their personal information, erase personal information or restrict the processing of personal information, including refraining from sharing it or otherwise providing it to any third parties. Data subjects also have the right to raise complaints with the Information Regulator. The aforementioned rights may be subject to certain limitations pursuant to applicable law. In order to access any of these rights, please contact us.

If you are a user or visitor in the European Economic Area these rights also apply to you. For the purposes of applicable EU data protection law (including the General Data Protection Regulation 2016/679 (the “GDPR”), we are a ‘data controller’ of your personal information.

Data subjects are encouraged to contact Maserumule in order to update their personal information as and when necessary.

## **15. CHANGES TO THIS POLICY**

We reserve the right, in our sole discretion to amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time. You agree to review the Privacy Policy whenever you visit this website for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

We are strongly committed to ensuring that the personal information you provide to us is treated securely and responsibly. We appreciate the fact that you are aware of your rights as an individual relating to personal information and thus will not act in a manner that would potentially lead to negative impact on your well-being.

## **16. CONTACT DETAILS**

Address: 1st floor, Tijgerpark 2, No. 51 Willie van Schoor Drive, Bellville, Cape Town, South Africa 7530

Information Officer: Ulrich Stander

Email address: [ulrich@masconsulting.co.za](mailto:ulrich@masconsulting.co.za)

--oo00oo--