

ALUSANI SKILLS & TRAINING NETWORK® PRIVACY POLICY

1 DEFINITIONS

1.1 In this document, the following words have the following meanings:

“Alusani®”, “Us” and “We”	Alusani Skills & Training Network®;
“CPA”	the Consumer Protection Act 68 of 2008, together with any regulations promulgated in relation thereto, as amended from time to time;
“ECTA”	the Electronic Communications and Transactions Act 25 of 2002, together with any regulations promulgated in relation thereto, as amended from time to time;
“Personal Information”	any personal information about your organisation, representatives and employees, as set out in the CPA, the ECTA and POPIA, including but not limited to information about contact details, billing details, identity or registration numbers, VAT details, gender and age;
“Policy”	this Privacy Policy, as amended from time to time;
“POPIA”	the Protection of Personal Information Act 4 of 2013, together with any regulation promulgated in relation thereto, as amended from time to time;
“Process”	the manual or automated activity of collecting, recording, organising, storing, updating, distributing, deleting or removing personal information;
“You”, “Your” and “Yourself”	any person who makes use of the website and subsequent goods and services offered by Alusani® for any purpose whatsoever, whether or not such use is free of charge or paid for; and
“Website”	the website owned and operated by Alusani®

In addition, unless the contrary is specified, terms that are used in this policy that are specifically defined in *POPIA*, are given the meanings ascribed to them in *POPIA*.

2 OUR COMMITMENT TO YOUR PRIVACY

- 2.1 When you engage with Alusani®, you trust us with personal information about your organisation, your representatives and your employees. Alusani®, is committed to protecting your right to privacy. We value your trust and, as part of maintaining that trust, we recognise that there needs to be transparency and accountability regarding how we deal with your personal information.
- 2.2 The purpose of this policy is to explain to you how Alusani®, collects, uses, discloses, manages and safeguards the personal information that it processes in the course of its business.
- 2.3 By accessing this website, you are deemed to have accepted and agreed to the collection and processing of your personal information and use practices set out in this policy. Such acceptance is voluntary, but it is required in order for Alusani®, to provide you with the services that we offer.

3 WHAT INFORMATION IS COLLECTED

- 3.1 Alusani®, may collect personal information in conducting Alusani®’s ordinary business operations, including through the use of its website.
- 3.2 When Alusani® processes personal information, Alusani® will at all times do so for legitimate business purposes and in line with the provisions of POPIA and other relevant legislation.

“Trust the name you know.”

4 CONSENT

- 4.1 Unless permitted by law, whenever consent is required to use, collect or process your personal information, Alusani®, will ensure that it obtains such consent from you.
- 4.2 You may withdraw your consent for Alusani® to use your personal information at any time. It is essential, however, to keep in mind that if you do withdraw such consent, it may negatively affect the quality and level of service that Alusani® is able to provide you with.

5 STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

- 5.1 Alusani®, will keep your personal information confidential. In this regard, Alusani® has adopted a security model that complies with generally accepted information security practices and procedures. Should you require any further information on how your personal information is stored, including information on password controls, encryption processes, fire-wall technology, and anti-virus software, please do not hesitate to contact us via the Information and Privacy Officer listed in clause 15 below.
- 5.2 Alusani®, will at all times take all reasonable organisational and technical measures to prevent any damage or loss to your personal information or any unlawful access to or processing of your personal information.
- 5.3 Alusani®, has a security policy in place that every employee, officer and supplier of Alusani®, must adhere to.
- 5.4 At all times, Alusani®, undertakes to you that we will use all reasonable endeavours to:
- 5.4.1 identify all reasonably foreseeable risks to any personal information in Alusani®'s possession or under Alusani®'s control;
 - 5.4.2 establish and implement safeguards against any of the risks that Alusani® identifies;
 - 5.4.3 verify on an ongoing basis that all safeguards are effectively maintained and updated in response to any new risks that may come to Alusani®'s attention.

6 USE AND DISCLOSURE OF PERSONAL INFORMATION

- 6.1 Alusani®, operates its website and conducts its business in accordance with South African legislation. At all times, Alusani®, will take all reasonable steps to ensure that the privacy requirements, as set out in relevant pieces of legislation, are adhered to.
- 6.2 You agree that Alusani®, may process your personal information for the following purposes:
- 6.2.1 the provision or rendering of any services that your organisation, representatives, or employees may require; and
 - 6.2.2 the provision of relevant information to a contracted third party who requires such information to render a service to you, including but not limited to the Course Leaders who conduct courses on behalf of Alusani®, provided that such third parties shall at all times agree to keep such information confidential.
- 6.3 Alusani®, does not typically share your personal information with third parties, other than when such sharing:
- 6.3.1 is required to provide you with the services that Alusani® offers to you, as stated in 6.2.2 above;
 - 6.3.2 Alusani®, has a legal or contractual obligation to share such personal information with a third party; or
 - 6.3.3 the provision of such information is required for risk or fraud prevention purposes.
- 6.4 If Alusani®, needs to send any personal information offshore, it will take all reasonable steps to ensure that it complies with all legislative requirements in this regard, including the requirements contained in POPIA.

7 RETENTION OF PERSONAL INFORMATION

- 7.1 All personal information retained by Alusani®, including information obtained through the use of this website, is retained in accordance with the provisions contained in POPIA, as well as all other applicable legislation.
- 7.2 In general, you agree that we may keep your personal information until you request that we delete or destroy it. If you feel that Alusani®, has retained your information for longer than is reasonably necessary, given its purpose, you may ask Alusani® to delete or destroy it. This is unless the law



requires Alusani®, to keep your information for a prescribed period.

- 7.3 If you believe that any personal information that Alusani®, has about you is excessive or has been unlawfully obtained, you may ask Alusani® to delete or destroy it.
- 7.4 Where Alusani®, is unable to delete your personal information, we will take all reasonable steps to make it anonymous.

8 YOUR WARRANTIES AND UNDERTAKINGS TO US

- 8.1 You warrant that when you give us personal information about your organisation, officers, representatives and employees, you have received permission to share such personal information with us, for the purposes set out in this policy and any related purpose.
- 8.2 As an employer, you agree to indemnify us against any loss or damage, direct or indirect, that an employee suffers due to the unauthorised use of such employee's personal information.
- 8.3 If you or your employees, officers or representatives choose to share personal information with any third party in relation to the services provided by Alusani®, we will not be responsible for any loss suffered by you, or such employees, officers or representatives, and you agree to indemnify us in this regard.

9 COOKIES

- 9.1 Cookies are small files containing information that are stored on your browser when you visit a website.
- 9.2 This website uses session cookies in a limited manner, for the purposes of tracking your use of the website and to improve the performance of the website for you.
- 9.3 You are able to set your browser to refuse to accept cookies, but this will mean that you may not be able to experience all of the features of the website.
- 9.4 Alusani®, has installed settings on the website to ensure that cookies cannot be used to obtain any personally identifiable details from you.

10 E-MAIL COMMUNICATIONS

- 10.1 Alusani®, may send you e-mail communication from time-to-time, which may include news, special offers, updates and other information relating to Alusani®, and its affiliates. This forms part of the services that Alusani®, offers to its clients.
- 10.2 Should you wish to unsubscribe from these e-mails, you may do so by following the instructions set out in each e-mail, or by contacting us using the e-mail address listed in clause 15 below.

11 ACCESSING AND UPDATING YOUR INFORMATION

- 11.1 You have the right at all times to know what personal information Alusani®, holds about you. At any time, you may contact us in order to:
 - 11.1.1 confirm that Alusani® holds personal information about you;
 - 11.1.2 request a copy or a description of your personal information that Alusani® holds; or
 - 11.1.3 confirm the identity or categories of third parties who have had, or currently have, access to your personal information.
- 11.2 Please use the contact details listed in clause 15 below, as regards any request regarding your personal information.
- 11.3 Alusani®, may charge a prescribed or reasonable fee should you request copies of your personal information and we will inform you at the time that the request is made what this fee is.
- 11.4 When you make a request regarding your personal information, Alusani®, may take reasonable steps to confirm your identity.
- 11.5 There may be certain times when Alusani®, will not be able to grant you access to your personal information. These times may include, but are not limited to instances when:
 - 11.5.1 granting you access will result in a breach of confidentiality; or
 - 11.5.2 access to the information will threaten the privacy of others.
- 11.6 Whenever Alusani®, is unable to grant you access to your personal information, we will always provide you with comprehensive reasons as to why this is the case.
- 11.7 If you are of the view that any personal information held by Alusani®, about you is incorrect, you may ask us in writing to correct it.



12 LINKS TO THIRD PARTIES

- 12.1 The website may contain links to third party websites. It is important that you understand that if you follow a link to any of these websites, they have their own use and privacy policies.
- 12.2 Alusani®, does not accept responsibility or liability for any use and privacy policies on third party websites.
- 12.3 If you do not want these parties to collect your personal information, please contact them directly.
- 12.4 If you are a client of Alusani®, a user of the website, or have purchased any services or products from Alusani®, we may use your contact details to send you information regarding any new similar services or products which we may offer from time to time. In doing so, Alusani® will, at all times, comply with all applicable legislation, as it relates to direct marketing or otherwise.
- 12.5 Alusani®, is not responsible for any information, representations, warranties, and/or content on any website of any third party (including websites linked to the Alusani® website) as we do not exercise control over third parties' privacy policies. The onus is on you to refer to the privacy policy of any such third party before providing them with any personal information
- 12.6 You agree to indemnify Alusani®, regarding any loss that you may sustain should you fail to take the steps set out in clause 12.5 above.

13 POLICY MODIFICATIONS

- 13.1 Alusani®, in its sole discretion, reserves the right to amend, modify or update this policy from time to time, with or without notice to you.
- 13.2 The most updated version of this policy will always be available on the website.
- 13.3 You agree and undertake to review this policy whenever you visit the website.
- 13.4 Save as expressly provided to the contrary in this policy, any amended version of this policy will supersede and replace previous versions thereof.

14 MERGERS AND ACQUISITIONS

- 14.1 Should Alusani®, become involved in a proposed or actual merger, acquisition or any other sale of business or sale of assets, Alusani®, shall have the right to share your personal information with third parties in connection with such transaction.
- 14.2 In the case of an acquisition, merger or sale, the new entity will have access to your personal information. The terms of this policy will continue to be applicable.

15 CONTACT INFORMATION

- 15.1 If you have any questions, concerns or comments regarding this policy, or your personal information, please send them to:
The Information and Privacy Officer.
E-mail: privacy@alusani.co.za
Address: Dunkeld Court, Suite A, Block A, 16 North Road, Dunkeld West, 2196.
Telephone: 011 447 7470.

16 COMPLAINTS AND DISPUTES

- 16.1 If you believe that we have used your personal information contrary to this policy, you have a right to complain, or to dispute the information that we hold.
- 16.2 We encourage you to first follow our internal complaints process. To do so, please contact the Information and Privacy Officer, as listed in clause 15 above.
- 16.3 If you feel that your complaint or dispute has not been resolved adequately by us, please feel free to contact the Information Regulator. The contact details for the Information Regulator are as follows:
The Information Regulator (South Africa)
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
P.O Box 31533, Braamfontein, Johannesburg, 2017
Complaints email: complaints.IR@justice.gov.za