



SECURITY ACCESS SPECIALISTS

ClickOn Communications (Pty) Ltd Privacy Notice

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Amendment Record

| REVISION | DATE | NAME | DESCRIPTION |
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| 1.0 | 1 May 2021 | POPIA Team | Final Document |
| 1.1 | 27 May 2021 | POPIA Team | Multiple platform changes. |
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Introduction

We respect the privacy of everyone who visits the ClickOn online platforms (Website, Mobile App and Customer Portal). As a result, we would like to inform you regarding the way that your Personal Information may be used. We recommend you read the ClickOn Privacy Notice and Consent documentation 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 notice. By using our Website, Mobile App or Portal you acknowledge that you have reviewed the terms of this Privacy Notice and Consent to Use of Personal Information (the “Privacy Notice and Consent”) 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 use our online platforms, and please do not provide any Personal Information through these platforms. This Privacy Notice and Consent forms part of our Site [Terms and Conditions of Use](#) and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At ClickOn we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and in accordance with the act.

Who we are

Established in 2003, ClickOn Communications is a Pretoria based company specialising in the design and implementation of electronic visitor and residential access control systems to and from closed communities. All our products are designed and manufactured in-house, and we supply our services and equipment nationwide.

When providing our services, we take our responsibilities regarding data protection very seriously and are bound by all applicable data protection laws in respect of the handling, processing, and collection of data. All employees who handle personal and business data are fully trained to ensure that the data is processed in line with the POPI Act.

The information we collect

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 as 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 where you provide us with your personal details, for example when you purchase/sell a product or services from/to us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.



Examples of information we collect from you are:

- Your name/Company name
- Your ID/Company registration number
- Your address/ Company address
- Your email address/ Company email address
- Your telephone/cell number/ Company telephone/cell number
- Any user-generated content, posts and other content you submit to our online platforms.

Collection of Non-Personal Information

We may automatically collect Non-Personal Information about you such as the type of internet browser you use or the website from which you linked to our website. We may also aggregate details which you have submitted on our platforms (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. We may from time-to-time supply third parties with this non-personal or aggregated data for uses in connection with our online platforms.

Cookies policy

We use the term “cookies” to refer to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications.

- **What is a cookie?**

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

- **Why do we use cookies?**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.



- **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third-party websites for information regarding their use of cookies.

- **How do I reject and delete cookies?**

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by ClickOn Communications by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies, you will still be able to visit our websites but some of the functions may not work correctly.

How we use your information

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 or supplier for security purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.
- To assist with business development.
- For the detection and prevention of fraud, crime, or other malpractice.
- 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.
- Evaluate the use of the site, products, and services.
- Make our platforms user-friendly and to better tailor the platforms and our products to your interests and needs.
- Help speed up your future activities and experience on our platform. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time.



- 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.
- 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.

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;

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes.
- Where we believe it is necessary to protect our rights.

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 personal information; Acceptable usage of personal information;
- Governance and regulatory issues;
- 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 that we remain responsible for, 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.

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 or at informationofficer@clickon.co.za and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in the ClickOn PAIA Manual (available on the ClickOn website).

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.

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:

www.gov.za/documents/download.php?f=204368

Right to object

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.



Right to lodge a compliant

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

<https://www.justice.gov.za/inforeg/contact.html>
33 Hoofd Street
Forum III, 3rd Floor
Braampark P.O Box 31533
Braamfontein, Johannesburg,
2017 Mr Marks Thibela
Chief Executive Officer
Tel No. +27 (0) 10 023 5207, Cell No. +27 (0) 82
746 4173 Email inforeg@justice.gov.za

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.

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 at the numbers/addresses listed on our website www.clickon.co.za in the ClickOn Communications PAIA Manual.