

Website Privacy Notice

Version 2



strate

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1. INTRODUCTION

- 1.1 Your privacy is very important to Strate Proprietary Limited ("**Strate**") and we are committed to safeguarding the privacy and security of personal information we may collect from all visitors to our website.
- 1.2 Please read the terms of this Website Privacy Notice ("**Notice**") carefully to understand our views and practices regarding personal information and how we will treat it. If you do not agree with Strate's processing activities as described in this Notice, please do not use the website.
- 1.3 By submitting any information to Strate in any form you acknowledge that such conduct constitutes an unconditional, specific and voluntary consent to the processing of such information by Strate under any applicable law in the manner contemplated below, which consent shall, in the absence of any written objection received from you, be indefinite and/or for the period otherwise required in terms of any applicable law.
- 1.4 Strate will not use your personal information for any purposes not mentioned in this Notice.
- 1.5 This Notice applies to personal information collected by Strate. It does not apply to the processing practices of third-party companies (including, without limitation, their websites, platforms and/or applications) which may be accessible through links from this website. Please check the websites of these third parties for their data protection regulations before sharing any personal information with such third parties.

2. RESPONSIBLE PARTY

- 2.1 Strate will be the party who will be collecting and processing your personal information and as such is designated as the responsible party for the purposes of this Notice. Strate may instruct operators to undertake processing activities listed below relating to your personal information from time to time.
- 2.2 Strate's contact details are as follows:

Physical address: 5th Floor, Tower 1, The Marc, 129 Rivonia Road, Sandown, Sandton.

Telephone number: +27 11 759 5300

Email address: info@strate.co.za

Website address: www.strate.co.za

3. PERSONAL INFORMATION WE MAY COLLECT

- 3.1 Personal information is any information that identifies or relates to you as an individual or juristic person.
- 3.2 We collect information in four ways: directly from your input, your organisation, third-party sources, and through automated technologies.
- 3.3 **Information you provide to us**

3.3.1 Depending on how you interact with us, Strate may collect the following personal information from you:

- **basic personal details** such as your name, surname, job title and registration or identification number, issuer business partner ID, branch identifier code;
- **contact details** such as your email address, postal address, physical address, telephone or cell phone number;
- **account login credentials** such as usernames, user ID, Jcode ID and passwords;
- **comments, feedback** and other information you provide to us including search query data, your preferences or interests, your personal views or opinions;
- **correspondence** sent by you which is private or confidential in nature;
- **script account number**
- personal information that you may provide to us in the course of registering for and attending events including dietary requirements; and
- any other personal information relating to you which you may provide.

3.4 Please note that you can choose not to provide personal information to us when requested. However, certain functions of our website depend on the availability of personal information. Failure to make your personal information available may result in functions not being available to you or only being available to a limited extent.

3.5 Information from your organisation

3.5.1 Strate may obtain your personal information from your employer or an organisation you are affiliated to in order to activate and manage access to and use of the organisation's subscription to our services including:

- **Contact details** such as your organisational email address, postal address and telephone number;
- **account registration information** such as your job title; and/or
- organisational user ID and log-in and account information.

3.6 Information from third-party sources

3.6.1 We may collect personal information from third parties including:

- publicly available sources of information;
- social media sites such as Twitter and LinkedIn; and/or
- business partners in connection with Strate's functions and services.

3.7 Anonymous information collected through this website

3.7.1 You may visit the website without providing any personal information. However, the website servers may collect and store technical information regarding the use of the website. This includes, but is not limited to:

- operating system, browser and device information;
- website and application usage data;
- Internet Protocol (IP) address;
- geographic location;
- information that has been anonymised or aggregated; and

- information collected through the use of cookies and similar technologies. For more information see the cookies and similar technologies section below.

3.8 Strate analyses non-identifiable and aggregate traffic data to improve our services via third-party applications. This technology does not identify you personally, it simply enables us to compile statistics about our visitors and their use of our website.

4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

4.1 We will only use your personal information where we are permitted to do so by applicable law. In terms of POPIA, we can only process your personal information where a legitimate basis recognised by POPIA is present. The legitimate bases recognised by POPIA are where -

- 4.1.1 your consent is obtained (or consent of a competent person where the data subject is a child);
- 4.1.2 processing is necessary to carry out the actions for conclusion of a contract to which you are a party;
- 4.1.3 processing complies with an obligation imposed by law on Strate;
- 4.1.4 processing protects your legitimate interest(s); or
- 4.1.5 processing is necessary for pursuing the legitimate interests of Strate or of a third-party to whom the information is supplied.

4.2 Strate will only process personal information where one of the legal bases referred to in paragraph 4.1 above is present.

4.3 Where Strate is relying on your consent as the legal basis for processing personal information, you have the right to withdraw your consent, and where we rely on legitimate interests, you have the right to object to our processing of personal information at any time. This will not affect the lawfulness of any processing done prior to the withdrawal of consent or any processing justified by a legal ground set out in paragraphs 4.1.2 to 4.1.5 above.

4.4 If the consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, Strate will ensure that the personal information is no longer processed.

5. USE OF PERSONAL INFORMATION

5.1 Strate will only process personal information that you provide through this website for the purpose for which you provided it.

5.2 Depending on how you interact with us, we may use your personal information for the following general purposes:

- 5.2.1 to receive services or products you provide to Strate from time to time;
- 5.2.2 to inform you about and provide services to you from time to time;
- 5.2.3 to respond to any correspondence that you may send to Strate, including via e-mail or by telephone;

- 5.2.4 to contact you from time to time, where specific consent has been given to be included on a Strate mailing list;
- 5.2.5 to respond to your requests, inquiries, comments and fulfil requests by you;
- 5.2.6 to update our records and keep contact details up to date;
- 5.2.7 to enable you to subscribe to our newsletters, register for Strate events, workshops and seminars;
- 5.2.8 for authentication purposes and account access to the recruitment portal, data services, Legal Entity Identifier portal or Central Messaging Front End;
- 5.2.9 to provide effective advertising (for example to be provide you with news and general information about other services and events which we offer, that are similar to those that you have already subscribed to or enquired about);
- 5.2.10 comply with applicable regulations;
- 5.2.11 for such other purposes to which you may consent from time to time; and
- 5.2.12 for such other purposes authorised in terms of applicable law.

6. STORAGE OF PERSONAL INFORMATION

- 6.1 Strate may store your personal information using Strate's own secure servers or other internally hosted technology. Your personal information may also be stored by third parties, via cloud services or other technology, with whom Strate has contracted, to support Strate's business operations.
- 6.2 Strate will ensure that such third-party service providers will process the personal information in accordance with the provisions of this Notice, all other relevant internal policies and procedures, and POPIA.

7. RETENTION OF PERSONAL INFORMATION

- 7.1 Strate will retain personal information for as long as necessary to fulfil the purposes for which that personal information was collected and/or as permitted or required by applicable law.
- 7.2 Strate may retain personal information for longer periods for statistical, historical or research purposes, and should this occur, Strate will ensure that appropriate safeguards have been put in place to ensure that all recorded personal information will continue to be processed in accordance with this Notice and the applicable laws.
- 7.3 Once the purpose for which the personal information was initially collected and processed no longer applies or becomes obsolete, Strate will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information.
- 7.4 In instances where Strate anonymises your personal information for research or statistical purposes (i.e. the information has been de-identified), Strate may use such anonymised information indefinitely without further notice to you.

8. SAFE-KEEPING OF PERSONAL INFORMATION

- 8.1 Strate will take all appropriate, reasonable technical and organisational measures to safeguard your personal information to prevent loss or theft, unauthorised access, disclosure, copying, use or modification of your personal information.

9. PROVISION OF PERSONAL INFORMATION TO THIRD PARTIES

- 9.1 Strate will not make your personal information available to any third-party unless it is necessary for the purpose for which you provided the information.
- 9.2 Strate may, in the course of providing any content or services on this website or for purposes listed in paragraph 5.2 above, share certain personal information with third-party operators who perform certain processing activities on Strate's behalf. For example, service providers may be used, *inter alia*, to provide telephone support when registering on the recruitment portal, help us administer and improve the website, and/or for data storage.
- 9.3 We may share your personal information with the following categories of third parties:
- 9.3.1 a limited number of our employees;
 - 9.3.2 select business partners;
 - 9.3.3 service providers who provide Strate with legal assistance, auditing services, recruitment services, IT services and other third-party service providers or experts engaged in the course of the services we provide to our clients; and
 - 9.3.4 we may disclose your personal information to the government and regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations, as applicable.
- 9.4 If we disclose your personal information to a third-party, we will enter into written agreements with such third-party service providers to ensure that they process any personal information in accordance with the provisions of this Notice and POPIA.
- 9.5 We require that our service providers take appropriate, reasonable technical and organisational measures to keep your personal information secure.

10. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 10.1 Strate may transfer your personal information to places outside of the Republic of South Africa and store it there, where our operators might process it. If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than the Republic of South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in the Republic of South Africa.
- 10.2 You should also take note that the processing of personal information in a foreign jurisdiction may be subject to the laws of the country in which the personal information is held, and may be subject to disclosure to the

governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

- 10.3 Your use of Strate’s website, followed by your submission of information to Strate, represents your consent to such transfer. Strate will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Notice.

11. YOUR RIGHTS

- 11.1 You have the right to ask Strate not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that Strate will always provide to you when we communicate with you. Strate won’t send you marketing messages if you tell us not to, but we will still need to send you service-related messages.

12. HOW TO ACCESS AND UPDATE YOUR PERSONAL INFORMATION

- 12.1 Strate will take reasonable steps to ensure that all personal information is kept accurate, complete and up to date. Kindly notify Strate, in writing, of any updates required in respect of your personal information.
- 12.2 You can request access to your personal information that is held by us at any time. You may also request us to correct your personal information if it is inaccurate or delete the personal information if we are no longer required to retain it by law or for a legitimate purpose.
- 12.3 To protect your privacy and security, Strate may request you to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of your personal information. Any such identifying information will only be used for the purpose of verifying your identity before facilitating access to any personal information that we hold about you.
- 12.4 Kindly contact Strate’s information officer to request access to your personal information or the correction of your personal information.

13. COSTS TO ACCESS PERSONAL INFORMATION

- 13.1 The prescribed fees to be paid for copies of your personal information are listed in Strate's PAIA Manual.

14. CHANGES TO THIS NOTICE

- 14.1 Strate will update this Notice from time to time. Any changes will be posted on Strate’s website. We therefore encourage you to review this Notice regularly so that you are aware of any amendments.

15. HOW WE USE COOKIES AND SIMILAR TECHNOLOGIES

- 15.1 We use cookies (a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing) where they are required for particular features to work. The types of information a cookie collects includes your username, the date and time of your visits to the website, your browsing history and preferences.
- 15.2 Strate may use cookies to assist us with activities such as:
- enabling you to sign into our online portals and blogs;
 - authenticating you;
 - keeping track of information you have provided to us;
 - improving your browsing experience;
 - customising our interactions with you;
 - storing and managing your preferences and settings;
 - compiling statistical data;
 - analysing the performance and usability of our portals and blogs;
 - speeding up searches on the website;
 - measuring traffic patterns for our online services; and
 - determining which areas of our online services have been visited.
- 15.3 We also use similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage (HTML).
- 15.4 These technologies collect information that your browser sends to our servers including your browser type, information about your IP address, together with the date, time and duration of your visit, the pages you view and the links you click.
- 15.5 Our website may also contain web beacons or similar technologies from third-party analytics providers, through which they collect information about your activities across our website to help us compile aggregated statistics.
- 15.6 The provisions of this Notice are only applicable to cookies used by us and our operators. In some instances, third-party service providers may use cookies on the website. We do not control or access cookies used by third-party service providers.
- 15.7 You can either accept or decline the use of cookies on your computer's web browser. However, declining the use of cookies may limit your access to certain features on the website.

16. CONTACTING US

- 16.1 All comments, questions, concerns or complaints regarding your personal information or this Notice, should be forwarded to us as follows —

Information Officer

Tel: +27 11 759 5300

Email: dataprivacy@strate.co.za

Postal Address: Postal Address: PO BOX 78608, Sandton, 2146

Physical Address: 5th Floor, Tower 1, The Marc, 129 Rivonia Road, Sandown, Sandton.

- 16.2 If you are unsatisfied with the manner in which we address any complaint with regarding Strate's processing of personal information, you can contact the office of the Regulator, the details of which are set out below –

Website: <http://justice.gov.za/inforeg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za

17. GOVERNING LAW

- 17.1 This Notice, and the interpretation and enforcement thereof, will be governed by the laws of the Republic of South Africa and any legal action instituted in connection with this Notice must be instituted in the Republic of South Africa.