



# Strategix Technology Solutions

## Privacy Policy



## 1. OBJECTIVE

The objective of this Privacy Policy is to ensure that Personal Information which Strategix Processes is done in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and to furthermore ensure that confidential information in general of stakeholders are maintained.

## 2. PURPOSE

The purpose of this Privacy Policy is to:

- 2.1. Is to set out the basis on which Strategix processes the Personal Information of Data Subjects who makes use of our products or services, and who access our website: <https://strategix.digital/>
- 2.2. By making use of our products/services/website(s) you as the Data Subject expressly consents to the practices of Strategix as set out in this Privacy Policy (**Policy**).

## 3. SCOPE OF APPLICATION

- 3.1. This Policy shall apply to all Strategix's Customers, Suppliers, Vendors, Customers, Employees, and persons who visit the Strategix website and/or makes use of any Strategix products or services.
- 3.2. This Policy shall also apply to anyone who contacts Strategix to enquire about any products/services/or similar information.
- 3.3. Everything reasonably within Strategix's power must be done, to ensure that the conditions imposed by the government have been properly complied with by employees and stakeholders.

## 4. DEFINITIONS

- 4.1. "**Data Subject**" means the person to whom Personal Information relates. A Data Subject can either be an individual or a juristic person (company), and in the case of this Policy when referring to "**You**" this shall also mean the Data Subject;



- 4.2. **"Document"** or **"Documentation"** means any record, in any form, containing Personal Information;
- 4.3. **"Operator"** means a person or entity who is appointed by the Responsible Party to Processes Personal Information on its behalf;
- 4.4. **"Personal Information"** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Personal Information can include, but is not limited to –
  - 4.4.1. Information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - 4.4.2. Information relating to the education or the medical, financial, criminal or employment history of a person;
  - 4.4.3. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - 4.4.4. The biometric information of a person;
  - 4.4.5. The personal opinions, views or preferences of a person;
  - 4.4.6. Correspondence sent by a person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 4.4.7. The views or opinions of another individual about a person; and
  - 4.4.8. The name of a person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- 4.5. **"Policy"** shall mean this Privacy Policy,
- 4.6. **"Process", "Processing" or "Processed"** means anything that is done with Personal Information, whether by automated means or otherwise, such as collection, recording,



organisation, structuring, storing, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, aligning or combing, restriction, erasure or destruction.

- 4.7. **“Responsible Party”** means the party which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information, in this case being Strategix Technology Solutions, and may be referred to as **“We”** and **“Strategix”** throughout this Policy,
- 4.8. **“Security Incident”** means any actual or potential accidental or unauthorised access, destruction, loss, alteration, disclosure or any other unlawful forms of Processing of Personal Information.

## 5. CONSENT

- 5.1. By continuing to use Strategix’s Website/Products/Services, you as the Data Subject, consents to:
- 5.1.1. Acceptance of the terms as set out in this Policy. Where you as the Data Subject do not agree with the terms, please do not make use of our Website/Products/Services; and
- 5.1.2. You as the Data Subject agree that we as Strategix may process your Personal Information for, amongst other things,
- i. the purposes of providing you with access to our Products/Services, our Website; and
  - ii. for any other purposes set out in this Policy.

## 6. VARIATION OF POLICY

- 6.1. Strategix reserves the right to vary the terms of this Policy as required from time to time either by legislative, regulatory, or operational requirements. It shall be the responsibility of the Data Subject (You) to ensure that you have familiarized yourself with the most up-to-date version of this Policy each time You access our Website and/or make use of any of our Products and Services.



- 6.2. Strategix shall ensure that the most current and up-to-date version of this Policy is displayed on our website, and unless explicitly stated, the most up-to-date version will supersede all other previous versions.

## **7. WHAT PERSONAL INFORMATION DOES STRATEGIX PROCESS?**

- 7.1. Strategix may process various pieces of Personal Information of a Data Subject, depending on the nature of the relationship, however for the most part includes information necessary for us to provide you with the Products/Services and to protect and ensure our legitimate business interests. This may include all of the categories of personal information listed in POPIA, and amongst other, include at least all of the following information: –

- 7.1.1. Information and content you provide. We collect the consent, communications and other information you provide when you use our Products/Services, including when you sign up for an account, create or share content, and message or communicate with us via our Website or via any other means. We specifically process your name and identity number, e-mail and physical addresses, postal address, contact information, information in relation to your financial position, membership/account number, gender, and age, and such other information regarding yourself and/or your views if you choose to share same via our Site or when making use of our Products/Services;
- 7.1.2. We will limit the types of Personal Information processed to only that to which you have given your consent and which is necessary for our legitimate business interests, or as allowed by law.
- 7.1.3. Withholding of certain information of withdrawal of your consent may limit the types of Products/Services we will be able to offer or continue to offer to you.

## **8. WHEN WILL STRATEGIX PROCESS MY PERSONAL INFORMATION?**

- 8.1. The Data Subject's Personal Information may be processed by Strategix when:
- 8.1.1. You visit, browse, register, subscribe and/or apply for and use our Products/Services and/or our Website;



- 8.1.2. You register to receive any notifications from us in respect of our email authentication service and/or our text message authentication service;
  - 8.1.3. You are given the opportunity to opt out of a specific form of information sharing, but choose not to do so;
  - 8.1.4. We carry out research;
  - 8.1.5. When or if required by law;
  - 8.1.6. When you conclude an agreement with us for the rendering of Products/Services; and/or
  - 8.1.7. When and if it is in your best interest.
- 8.2. You, as the Data Subject, further acknowledge that all Personal Information processed by us may be stored by us and used, *inter alia*, for any of the purposes, but not exclusively, listed in clause 9 below.

## 9. HOW DOES STRATEGIX USE YOUR PERSONAL INFORMATION?

- 9.1. Strategix may use the Data Subject (Your) Personal Information in the following manner:
- 9.1.1. In order to deliver our Products/Services, including to personalise features and content (such as services, products and advertisements) and make suggestions for you (such as pages, services and information you may be interested in or topics you may want to follow) on or about our Products/Services or on our Website. To create personalised content that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our Website; and the people, places, or things you're connected to and interested in, on and off our Website;
  - 9.1.2. To develop, test and improve our Products/Services and/or our Website, including by conducting surveys and research, and testing and troubleshooting new products and services and features;



- 9.1.3. To select and personalise advertisements, offers and other sponsored content that we show you;
- 9.1.4. To provide measurement, analytics, and other business services. We use the information we have (including your activity of our Products/Services, such as the websites you visit and advertisements you see) to help advertisers and other partners measure the effectiveness and distribution of their advertisements and services and understand the types of people who use their services and how people interact with their websites, apps, and services.
- 9.1.5. To promote safety, integrity and security.
- 9.1.6. To communicate with you. We use the information we have to send you marketing communications, communicate with you about our Products/Services, and let you know about our policies and terms. We also use your information to respond to you when you contact us;
- 9.1.7. for helping us in any future dealings with you; and
- 9.1.8. for any other purpose as legally authorised to do and as is allowed by law.

## **10. WHERE STRATEGIX STORES YOUR PERSONAL INFORMATION:**

- 10.1. All of the Personal Information which you, as the Data Subject provides to us is stored manually, and/or on our secure cloud-based platform and/or servers operated, maintained and protected in the Republic of South Africa (RSA);
- 10.2. Records of the Personal Information will not be retained for longer than is necessary for operational or archiving purposes, unless retention of record is required or authorised by law. Records of the information may be retained for periods in excess of those contemplated for historical, statistical or research purposes. This will be subject to us establishing appropriate safeguards (which can include de-identifying the records) against the records being used for any other purpose;



- 10.3. Unfortunately, the transmission of information via the internet is not completely secure. We will use appropriate and reasonable technical and organisational measurements to protect the Personal Information as provided, we cannot however guarantee the security of your data transmitted to our Site or to any other location by electronic means. Any transmission is at your own risk. However, once we have received the Personal Information, we will use appropriate and reasonable technical organisational measurements to try and prevent unauthorised access.

## 11. SHARING OF YOUR PERSONAL INFORMATION

- 11.1. As a general rule, Strategix will not share your Personal Information with anyone outside of Strategix without your knowledge and express consent, however you hereby acknowledge, and consent that Strategix may share your personal Information when:

- 11.1.1. by sharing information among our different divisions, we can serve you more efficiently;
- 11.1.2. we are required by law to do so, for instance in the case of government tax or levy reporting requirements, or otherwise;
- 11.1.3. it is necessary in order to protect our interests or for the purposes of legal action against a person who may be causing injury or interference with (either intentionally or unintentionally) our rights or property, other users, or other persons that could be harmed by such activities, or performance in terms of or enforcement of an agreement;
- 11.1.4. it would be in your best interest; and/or
- 11.1.5. it is in the public interest, for example to assist in the prevention of crime.

- 11.2. We will not disclose any of your personal information to third parties for independent use, except when we have your consent and/or permission to do so or where we are required to do so in terms of law or if same is in your best interest;

- 11.3. You agree that your personal information may be shared to our holding companies, subsidiary companies, agents, advisers, partners, service providers and suppliers, or in the event of a change control if the ownership or control of all or a part of our Products/Services changes, we may transfer your information to such new owner.



## 12. YOUR RIGHTS AS THE DATA SUBJECT

- 12.1. You have the right to, in accordance with these terms, request that we correct, destroy or delete any of your Personal Information that we have processed on our Products/Services and/or our Website. The personal information that you may request us to correct, destroy or delete is personal information that has been processed in accordance with these terms that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain. These requests may be requested as per our PAIA Manual.
- 12.2. You have the right to withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that the withdrawal of your consent does not affect the processing of your personal information before the withdrawal of your consent; or that the withdrawal of your consent does not affect the processing of your personal information if the processing is in compliance with an obligation imposed by law on us; or that the withdrawal of your consent does not affect the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body; or that the withdrawal of your consent does not affect the processing of your personal information as required by law; or that the withdrawal of your consent does not affect the processing of your personal information as required to finalise the performance of a contract in which you are a party; or that the withdrawal of your consent does not affect the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 12.3. You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests, our legitimate interests or the legitimate interests of a third party the information is supplied to.



- 12.4. You have the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- 12.5. You have the right to not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 12.6. You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in accordance with these terms. The Information Regulator's contact details are published by the government from time to time in terms of POPIA. When they are published POPIA places a duty on us to inform you what those contact details are, and we will do so via our Products/Services and/or our Website.
- 12.7. You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with these terms.

### **13. DIRECT MARKETING**

- 13.1. We may process your personal information for the purposes of providing you with information regarding products or services that may be of interest to you. You may unsubscribe for free at any time.
- 13.2. If you currently receive marketing information from us which you would prefer not to receive in the future please email our Information, or Deputy Information Officer as provided for under Section 16 of this Policy, or alternatively, unsubscribe using the unsubscribe function when receiving marketing communication from us.
- 13.3. You will continue to receive other product information until the option not to receive future communications has been selected.

### **14. PASSWORD AND LOGIN INFORMATION**

- 14.1. You may register your personal information with us via e-mail or via our Website, or manually or as may be otherwise communicated to you from time to time.



- 14.2. If you register your Personal Information, you will be able to create your own user name and password.
- 14.3. You must not provide your username or password to anyone. You are solely responsible for keeping your username or password secret.
- 14.4. You are solely responsible for any loss you may suffer should any other person use your username or password.

## 15. YOUR RESPONSIBILITY TO PROTECT YOUR PERSONAL INFORMATION

- 15.1. Do not share your identity details with anyone.
- 15.2. Do not share your login details and passwords and change your passwords regularly.
- 15.3. Do not supply your personal and/or financial information to any website you don't know or trust.
- 15.4. Do not send confidential information via un-encrypted e-mail.
- 15.5. Do not leave your device unattended while conducting online transactions and remember to sign off after an online session.
- 15.6. Let us know when your details change, thereby helping us to maintain accurate record.

## 16. CONTACT DETAILS

- 16.1. You may contact us with regard to this Policy or your Personal Information at:

### 16.1.1. Information Officer:

**Name:** Steve Delgarno

**Email:** [steved@strategix.co.za](mailto:steved@strategix.co.za)

**Tel:** 087 802 0179

### 16.1.2. Deputy Information Officer:



**Name:** Wikus van Niekerk

**Email:** [wikusn@strategix.co.za](mailto:wikusn@strategix.co.za)

**Tel:** 083 277 3334

**16.1.3. Physical Address:**

First Floor, York House, Tybalt Place, Waterfall Park,

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Midrand,

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# Business, Simplified.

[strategix.co.za](http://strategix.co.za)

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