



MaPa Cleaning Technologies cc

DOCUMENT NAME	IT PRIVACY POLICY
DOCUMENT NUMBER	2021/06/21
POLICY AREA	INFORMATION TECHNOLOGY

IT PRIVACY POLICY

1. INTRODUCTION

- 1.1 MaPa Cleaning Technologies (MaPa) is committed to protecting and respecting users' privacy when utilizing MaPa's electronic information and communication systems.
- 1.2 In terms of the Protection of Personal Information Act, No. 4 of 2013 (the Act), MaPa will be responsible for the protecting and respecting of the users' electronic information and communication systems.

2. DEFINITIONS

- 2.1 **'Users'** mean all persons including, but not limited to, permanent or temporary employees, directors, consultants, contractors, customers, and trainees who have access to, or use of, MaPa's electronic information and communication systems.
- 2.2 **'Cookies'** are small amounts of data generated by a website and saved by your web browser. Its purpose is to remember information about you, similar to a preference file created by a software application. While cookies serve many functions, their most common purpose is to store login information for a specific site.
- 2.3 An **'IP address'** is a set of numbers assigned to a user's computer during a browsing session. It is activated whenever the user logs onto the Internet via his/her Internet service provider or network.
- 2.4 **'Information Security Officer'** is the person appointed and employed by MaPa to enforce and manage this policy.
- 2.5 **'Policy'** means this IT Privacy Policy.
- 2.6 Reference to **'consent'**, **'your consent'** or **'your explicit consent'** include the clicking of **'application'** or **'submit'** button or **'I agree'** button on MaPa's website.

3. SCOPE

- 3.1 This policy sets out the guidelines and principles that will govern how MaPa collect and process any personal information collected from users or provided by users to MaPa.
- 3.2 A copy of this policy should be available at all times on the MaPa websites and apps.

4. HOW MAPA COLLECTS INFORMATION FROM USERS

- 4.1 Users may provide MaPa with personal information while completing either online forms or any other forms and documents at any MaPa premises or website or by means of telephonic conversation, email or any other communications channel. This includes information provided to MaPa:
 - 4.1.1 during product enquiries;
 - 4.1.2 by completing an online lead form;
 - 4.1.3 by subscribing to services or newsletters;
 - 4.1.4 by participating in social media forums on/or linked to MaPa website;
 - 4.1.5 by completing a survey, and
 - 4.1.6 by reporting a problem regarding the MaPa website.
- 4.2 With each visit to the MaPa website, MaPa automatically collect the following information:
 - 4.2.1 Technical information, including the Internet Protocol address ('IP address') used to connect a user's computer to the Internet, their login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

4.2.2 Information about user's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site, date and time, services/products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information such as scrolling, clicks and mouseovers, methods used to browse away from the page and any phone number used to call our customer service number.

4.2.3 Cookies

4.2.3.1 Cookies may be used by MaPa to understand better how users navigate and use our site. Cookies allow MaPa to determine how frequently particular pages are visited, the most popular areas of its site and how frequently particular pages are revisited. Cookies also allow MaPa to make its sites more user friendly, for example, permanent cookies allow MaPa to save the user's password so that the user does not have to re-enter it every time he/she visits its site.

4.2.3.2 Cookies do not contain personal information such as users' home address, telephone number or credit card details. However, personal information that MaPa stores about users, as per 4.2.3.1 may be linked to the information stored in and obtained from cookies. MaPa does not exchange cookies with any third-party websites or external data suppliers.

4.2.3.3 Users' browser generates other information, including which language the website is displayed in and their IP addresses. Users' IP addresses are automatically logged by MaPa's servers and used to collect traffic data about visitors to its websites. MaPa does not use IP addresses to identify users personally.

4.2.3.4 MaPa only keeps cookies for the duration of their visit to its site.

5. USES MADE OF THE INFORMATION

5.1 When given information, MaPa will solely use the information to:

- 5.1.1 carry out day-to-day administration, account, marketing or product relevant information, between a user and MaPa and provide users with the information and services they request from MaPa;
- 5.1.2 provide users with information about other services offered similar to information previously acquired or enquired about;
- 5.1.3 provide users with information about product training and or services;
- 5.1.4 notify users about changes and specials to MaPa's products and services;
- 5.1.5 ensure that content from MaPa's site is presented in the most effective manner for a user, and

5.1.6 deal with enquiries and complaints made by or about users relating to MaPa's site or other services users use.

5.2 When collecting information about users, MaPa will use the information:

5.2.1 to administer its site and apps for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.2.2 to improve its site and apps to ensure that content is presented in the most effective manner for users;

5.2.3 to allow users to participate in interactive features when elected as part of MaPa's efforts to keep its site safe and secure;

5.2.4 to measure or understand the effectiveness of advertising and present relevant advertisements, and

5.2.5 to make suggestions and recommendations to users of its site about goods or services that may interest them.

5.3 When receiving information from other sources:

5.3.1 MaPa may combine such information with information received and information collected regarding users. MaPa may use such information and the combined information for the purposes set out above, depending on the types of information it receives.

5.4 MaPa will only use personal information for other purposes when:

5.4.1 consent is given by users;

5.4.2 it is required by law or for law enforcement purposes;

6. DISCLOSURE OF INFORMATION

6.1 MaPa may share the information with any member of its group, meaning its subsidiaries and ultimate holding company, as defined in the Companies Act, No. 71 of 2008. MaPa will not share the information with any third parties, other than the following exceptions:

6.1.1 Analytics and search engine providers that assist MaPa in the improvement and optimisation of the site.

- 6.1.2 On the sale or purchase of any business entity or assets, MaPa may disclose the information to the prospective seller or buyer of such business or assets.
- 6.1.3 If MaPa or a substantial portion of its assets are acquired by a third party, the personal information held by MaPa about our users will be one of the transferred assets.
- 6.1.4 Compliance with legislation, court order or other legal obligation to enforce or apply its terms of use applicable to any particular site of MaPa or terms and conditions of supply of MaPa services to users and other agreements, or to protect MaPa's rights, property or safety, or the rights, property or safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. STORAGE OF PERSONAL INFORMATION

- 7.1 All information users submit, is stored on MaPa's secure servers. Hard copies of documents are stored at secure locations. Users are expected to keep passwords given of selected, used to access parts of the MaPa website.
- 7.2 Records of information kept, will not be retained longer than 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, subject to MaPa establishing appropriate safeguards against the records being used for any other purpose and/or MaPa has de-identified the record/s.
- 7.3 Transmission of information via the Internet is not completely secure. MaPa endeavours to use appropriate and reasonable technical and organisational measures to protect such information but, cannot guarantee the security of users' data transmitted to its site or to any other location by electronic means. Any transmission is at the users' own risk.

However, once MaPa has received the information, it will use appropriate and reasonable technical and organisational measures to attempt preventing unauthorised access.

8. SOCIAL MEDIA PLATFORMS

- 8.1 Communication, engagement and actions taken through external social media platforms in which MaPa, its directors or employees participate are custom to the specific terms and conditions as well as the privacy policies held with each social media platform.
- 8.2 Users must use social media platforms wisely and communicate/engage with them with due care and caution with regard to their own privacy and personal information policies. As MaPa do not request personal or sensitive information through social media platforms, users wishing to discuss sensitive details or to resolve issues/concerns, should contact MaPa through primary communication channels such as telephone or email.
- 8.3 MaPa social media page/(s), may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs. Users must take caution and good judgement before clicking any shortened URLs published on social media platforms. MaPa however, cannot be held liable for any damages or implications caused by visiting any shortened links.

9. INTERCEPTION AND MONITORING OF COMMUNICATIONS

- 9.1 MaPa, in accordance with relevant legislation, will intercept, monitor, copy or block communications to and from MaPa's communication facilities, including but not limited to our website, whatsapps, emails, etc.

10. USER RIGHTS

10.1 Third-party websites/social media sites

- 10.1.1 MaPa does not accept any responsibility or liability should users click on links to partner or advertiser's website from the MaPa's website.
- 10.1.2 It is the users' responsibility to check these policies before they submit any personal information to these websites.

10.2 Access to information

- 10.2.1 Users have a right to see/access the information that MaPa keeps. Users may request MaPa to provide them with any personal information it holds about them upon receipt of a written request and payment of a fee as per the Promotion of Access to Information Act, No. 2 of 2000 ('PAIA Act').
- 10.2.2 Not all information requested may and/or need to be disclosed. Disclosure of information shall take place in accordance with the PAIA Act.
- 10.2.3 Any request received by user in term of the PAIA Act must be handled by the recipient of the request in conjunction with MaPa's information officer. Non-compliance by the recipient of the request may put MaPa at risk and as such the said failure may lead to disciplinary action against the recipient.

11. QUALITY OF PERSONAL INFORMATION

- 11.1. It is the user's responsibility to check the accuracy of the information prior to submission to MaPa. On receipt of the information MaPa assumes that users have checked it and that the information is accurate.
- 11.2. MaPa will endeavour, to the best of its ability, to make available to users the means to amend the information themselves.

12. CHANGES TO OUR PRIVACY POLICY

- 12.1 Any changes MaPa may make to its privacy policy will be posted on our site and, where appropriate (not obliged), users will be notified by email.
- 12.2 It is the responsibility of users to ensure that they take cognisance of dates or changes to MaPa's privacy policy.

13. CONTACT

- 13.1 Questions, comments and requests regarding the privacy policy can be directed to mapa@mapa.co.za, for the attention of the IT security officer.

14. AMENDMENTS

- 14.1. This policy is subject for review within one calendar year of the date of last review, update or amendment.

- 14.2. This policy may be subject to review, update or amendment within the set calendar year, if the same is required by or in terms of change in legislation, change in external policy guidelines and/or relevant court rulings.
- 14.3. This policy may only be amended by the department head overseeing the category under which auspices this policy finds application.

Date of incorporation

1st July 2021

REVISION SCHEDULE

Date	Reviewed by	Date approved	Approved by	Date of next review
2021/06/21	MaPa IT	2021/06/21	OPS/HR	2022/06/21