



**Cleaning Equipment Manufacturing SA Pty Ltd**

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

## IT PRIVACY POLICY

### 1. INTRODUCTION

- 1.1 Cleaning Equipment Manufacturing SA Pty Ltd (CEMSA) is committed to protecting and respecting users' privacy when utilizing CEMSA's electronic information and communication systems.
- 1.2 In terms of the Protection of Personal Information Act, No. 4 of 2013 (the Act), CEMSA 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, CEMSA'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 CEMSA 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 CEMSA's website.

### 3. SCOPE

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

### 4. HOW CEMSA COLLECTS INFORMATION FROM USERS

- 4.1 Users may provide CEMSA with personal information while completing either online forms or any other forms and documents at any CEMSA premises or website or by means of telephonic conversation, email or any other communications channel. This includes information provided to CEMSA:
  - 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 CEMSA website;
  - 4.1.5 by completing a survey, and
  - 4.1.6 by reporting a problem regarding the CEMSA website.
- 4.2 With each visit to the CEMSA website, CEMSA 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 CEMSA to understand better how users navigate and use our site. Cookies allow CEMSA to determine how frequently particular pages are visited, the most popular areas of its site and how frequently particular pages are visited. Cookies also allow CEMSA to make its sites more user friendly, for example, permanent cookies allow CEMSA 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 CEMSA stores about users, as per 4.2.3.1 may be linked to the information stored in and obtained from cookies. CEMSA 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 CEMSA's servers and used to collect traffic data about visitors to its websites. CEMSA does not use IP addresses to identify users personally.

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

## 5. USES MADE OF THE INFORMATION

### 5.1 When given information, CEMSA 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 CEMSA and provide users with the information and services they request from CEMSA;
- 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 CEMSA's products and services;
- 5.1.5 ensure that content from CEMSA'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 CEMSA's site or other services users use.

**5.2 When collecting information about users, CEMSA 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 CEMSA'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 CEMSA may combine such information with information received and information collected regarding users. CEMSA may use such information and the combined information for the purposes set out above, depending on the types of information it receives.

**5.4 CEMSA 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 CEMSA 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. CEMSA will not share the information with any third parties, other than the following exceptions:

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

- 6.1.2 On the sale or purchase of any business entity or assets, CEMSA may disclose the information to the prospective seller or buyer of such business or assets.
- 6.1.3 If CEMSA or a substantial portion of its assets are acquired by a third party, the personal information held by CEMSA 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 CEMSA or terms and conditions of supply of CEMSA services to users and other agreements, or to protect CEMSA'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 CEMSA'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 CEMSA 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 CEMSA establishing appropriate safeguards against the records being used for any other purpose and/or CEMSA has de-identified the record/s.
- 7.3 Transmission of information via the Internet is not completely secure. CEMSA 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 CEMSA 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 CEMSA, 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 CEMSA do not request personal or sensitive information through social media platforms, users wishing to discuss sensitive details or to resolve issues/concerns, should contact CEMSA through primary communication channels such as telephone or email.
- 8.3 CEMSA 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. CEMSA however, cannot be held liable for any damages or implications caused by visiting any shortened links.

## **9. INTERCEPTION AND MONITORING OF COMMUNICATIONS**

- 9.1 CEMSA, in accordance with relevant legislation, will intercept, monitor, copy or block communications to and from CEMSA'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 CEMSA does not accept any responsibility or liability should users click on links to partner or advertiser's website from the CEMSA'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 CEMSA keeps. Users may request CEMSA 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 CEMSA's information officer. Non-compliance by the recipient of the request may put CEMSA 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 CEMSA. On receipt of the information CEMSA assumes that users have checked it and that the information is accurate.
- 11.2. CEMSA 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 CEMSA 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 CEMSA's privacy policy.

## **13. CONTACT**

- 13.1 Questions, comments and requests regarding the privacy policy can be directed to [CEMSA@CEMSA.co.za](mailto:CEMSA@CEMSA.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**

1<sup>st</sup> July 2021

**REVISION SCHEDULE**

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