

## **PRIVACY POLICY**

### **INTRODUCTION**

We are committed to protecting your personal information and your right to privacy. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it.

This privacy policy applies to all information collected through our websites (such as <https://www.teraco.co.za/> or ClientZone), Teraco Mobile Application, Access Control Application and Social Media applications e.g. Facebook, LinkedIn, Instagram or Twitter ("Apps"), and/or any related services, emails, surveys, sales, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us. By accessing the Sites, you are deemed to have accepted and agreed to the information collection and use practices described in this Privacy Policy.

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## **IMPORTANT INFORMATION AND WHO WE ARE**

### ***Purpose of this Privacy Policy***

This Privacy Policy aims to give you information on how Teraco collects and processes your personal data through your use of its Sites.

The Sites is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

### ***Controller***

Teraco Data Environments (Pty) Ltd (referred to as "Teraco", "we", "us" or "our" in this Privacy Policy) is the controller and responsible for your personal data.

We have appointed a data protection officer/ information officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise personal information rights, please contact the DPO using the details set out below.

### ***Contact details***

If you have any questions about this Privacy Policy or any of Teraco's privacy practices, please contact our DPO in the following ways:

<b>Full name of legal entity:</b>	Teraco Data Environments
<b>Email address:</b>	informationofficer@teraco.co.za
<b>Postal address:</b>	Postnet Suite #338 Private Bag X2020 Isando 1600 Johannesburg South Africa
<b>Telephone number:</b>	011 573 2800 and ask to speak to the Information Officer

You have the right to make a complaint at any time to the Information Regulator – South Africa's supervisory authority for data protection issues at <http://www.justice.gov.za/inforeg/> . Teraco would, however, appreciate the chance to deal with your concerns before you approach the Information Regulator and would advise that you contact us in the first instance.

### ***Changes to the privacy policy and your duty to inform us of changes***

We keep our Privacy Policy under regular review. This version was last updated on 19 February 2019.

It is important that the personal data we hold about you is accurate and current. Please keep Teraco informed if your personal data changes during your relationship with us.

### ***Third-party links***

Teraco's Sites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Teraco does not control these third-party websites and are not responsible for their privacy statements. We encourage you to read the privacy policy of every website you visit when you leave our website.

We provide you with the option to register using social media account details, like your Facebook, LinkedIn, Twitter or other social media account. If you choose to register in this way, please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you use the Sites, Teraco may require you to provide us with personally identifiable information or you may elect to provide Teraco with personally identifiable information. The personally identifiable information you provide may include:

- **Identity Data** including your name, company, job title, and other facts about yourself i.e. your marital status, title, date of birth and gender.

- **Contact Data** including your address, e-mail address, billing address, delivery address and telephone numbers.
- **Financial Data** including bank account information, company registration, VAT registration numbers etc.
- **Transaction Data** including details about service orders and payments to and from you and other details of products and services you have purchased from Teraco.
- **Technical Data** including automatically collected website usage information, your IP address, your login data, your browser type and version, your time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website.
- **Profile Data** including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** including the number and frequency of users to each web page, how visitors and subscribers use and navigate websites as well as how long you use our website.
- **Marketing and Communications Data** including your preferences in receiving marketing from Teraco and Teraco's third parties as well as your communication preferences.
- **Closed Circuit Television Recordings** including voice recordings. When accessing any of Teraco's properties, our signage clearly states that the area is under 24-hour surveillance. By accessing Teraco's properties, you acknowledge that Teraco will record activities on site using the closed-circuit television system, which in some cases includes voice recordings.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), without your consent. This

includes biometric data (fingerprint and photo), which we collect you enrol on our access control systems to access the property.

We do we collect any information about criminal convictions and offences, without your consent.

***If you fail to provide personal data***

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide services). In this case, Teraco may have to cancel a product or service you have with us but we will notify you if this is the case.

**HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes but is not exhaustive of personal data you provide when you:
  - apply for our products or services;
  - request information using contact forms on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Sites, we will automatically collect technical data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and/or other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.
- **Social Media Login Data.** We provide you with the option to register using social media account details, like your Facebook, LinkedIn, Twitter or other social media account. If you choose to register in this way, we will collect profile information which may vary depending on the social media provider concerned and based on the permissions configured on you

social media account, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

- **Third parties or publicly available sources.** We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

## **HOW WE USE YOUR PERSONAL DATA**

The personal information collected on the Sites will be used to operate the Sites and to provide the services or carry out the transactions you have requested. In support of these uses, Teraco may combine the personally identifiable information you have provided to it on the Sites with other information about you that is available to it, including usage information and information from other sources.

Teraco will only use your personal data when the law allows us to. Most commonly, we may use your personal data in the following circumstances:

- To enable Teraco to process, validate and verify requests for products and services and for the purposes for which you specifically provided the information;
- Special personal data is collected for use by our biometric access control systems ("Access Control") to validate the individual authorised to gain access matches the registered individual, and to facilitate access to restricted areas;
- Special personal data (closed circuit television) is collected by the video monitoring system to record all activities for incident investigation, crime prevention, public safety and to comply with contractual obligations;
- To improve your experience on the website; to improve and develop new products, features and services;
- To alert you to new products and services and special offers;
- To provide marketing with aggregate information about the user base and usage patterns;

- To allow Teraco to personalise the advertising users see based on their personal characteristics or preferences, and for other purposes.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Teraco may disclose any information about you to law enforcement agencies, government officials or other authorities, as Teraco, in its sole discretion, believes necessary or appropriate in the circumstances.

If you use the website to make application for employment with Teraco, you acknowledge that:

- Teraco will not under any circumstances be liable to you should your application be unsuccessful or should your application not be received;
- the technology utilised by Teraco and its third-party suppliers is designed to protect personally identifiable information but that Teraco is unable to guarantee that all such personally identifiable information is not capable of being illegally accessed and that accordingly you assume all risk associated therewith and agree that Teraco shall not under any circumstances be liable to you in respect thereof; and
- you provide any information solely at your risk and any information provided will be kept and stored for such period of time Teraco deems appropriate.

***Purposes for which we will use your personal data***

Teraco has set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To fulfil contractual obligations in respect of access control and video monitoring	(a) Identity, including special personal information	(a) Performance of a contract with you (b) Crime prevention and incident investigation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

<p>To administer and protect our business and Teraco’s Sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

**Marketing**

Teraco strives to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### ***Promotional offers from us***

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing or if we are legally entitled to send you such marketing.

### ***Third-party marketing***

Teraco will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### ***Opting out***

You can ask us or third parties to stop sending you marketing messages by following the opt-out links on any marketing message sent to you or by contacting us .

### ***Cookies***

We use cookies for the following purposes: to enable certain functions of the Service and to provide analytics.

There are two types of computer cookies: temporary and permanent. Temporary cookies, also called session cookies, are stored for a short time and then removed as soon as the browser is closed. Permanent cookies, also called persistent cookies, are stored for a long time on the user's hard drive and, if deleted, will be replaced the next time the respective site is visited. We only use session cookies on the Sites and we use different types of cookies to run the services:

- Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.
- Performance cookies. We use third party analytics e.g. Google Analytics to give us for example, the journey between different pages in combination with device type, to get a better sense of how our users engage with our applications to improve the performance of our sites and pages within the sites. This information does not include any personal information.

We do not use functionality or advertising cookies.

### ***Change of purpose***

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table "Purposes for which we will use your personal data" above:

- Internal third parties;
- External third parties;
- Specific third parties listed in the table "Purposes for which we will use your personal data" above; and
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **INTERNATIONAL TRANSFERS**

Personal information collected from you may be stored and processed in South Africa, or any other country in which Teraco operates or maintains facilities and may be transferred to third party suppliers to Teraco, in order to help Teraco to improve the content of the website, ClientZone and Teraco Mobile Application, provide you with the products or services requested, to consider and respond to any application for employment made, and to help service providers to perform services on its behalf. These countries may not have data protection laws similar to that of South Africa, but we will comply with applicable data protection legislation in this regard.

## **DATA SECURITY**

The personally identifiable information we collect about you is stored in limited access servers. Teraco maintains safeguards to protect the security, integrity, and privacy of these servers and your personally identifiable information.

### ***How long will you use my personal data for?***

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data and in some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

### ***You have the right to:***

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to

erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

***No fee usually required***

You will generally not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

***What we may need from you***

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

***Time limit to respond***

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**COMMENTS AND QUESTIONS**

If you have any questions or comments about this Privacy Policy, please contact Teraco by filling in the Contact Us form which can be found here <http://www.teraco.co.za/contact-us/>. Teraco reserves the right to contact you at any time regarding any problems or questions as well as to notify you of changes to the Privacy Policy, or to other policies or terms that affect you and your use of the website, but it is not obliged to do so.

**TERMS AND CONDITIONS**

This Privacy Policy is subject in all respects to the Terms and Conditions of use of the websites (such as <https://www.teraco.co.za/> or ClientZone), Teraco Mobile Application, Access Control Application and Social Media applications e.g. Facebook, LinkedIn, Instagram or Twitter. All Rights Reserved.

**AMENDMENT OF PRIVACY POLICY**

Teraco may amend this Privacy Policy from time to time, and will post any changes here, so that you are familiar with the Privacy Policy adopted by Teraco. Notwithstanding the right to amend the Privacy Policy as aforesaid, Teraco will not use your personal information in a manner materially different from this Privacy Policy without your prior consent.