

## **iTFuture Computer Solutions POPIA ACT - Privacy Policy (Customers)**

### **Introduction**

We value your privacy and would like to be transparent about the personal information we process when interacting with you. With this Personal Information Protection Notice, we inform and provide you with an overview of how we process your personal information and by doing so we are fulfilling our notification obligation.

We are committed to manage and Process your information in accordance with the applicable Privacy and information protection law provisions, which specifically provide for the lawful, fair and transparent processes of your personal information for specified, explicit and legitimate purposes in a reasonable manner that does not infringe on your right to privacy.

We recognize and are committed to protect your fundamental rights and freedoms, more specifically your right to privacy which includes the right to the protection act against unlawful collection, retention, dissemination and use of personal information. Into the Future cc (Registered number CK92/0025716/23) has drafted a plan of action when it comes to protection your privacy.

### **Audience**

This policy applies to you if you are:

- A visitor to our website
- A customer who has ordered or requested the goods or services that we provide
- A customer we visit at your business and/or residence

### **Personal Information**

Personal information includes:

- Certain information that we collect automatically when you visit our website
- Certain information collected on registration of a customer record
- Certain information collected on submission
- Optional information that you provide to us voluntarily

But excludes:

- Information that has been made anonymous so that it does not identify a specific person
- permanently de-identified information that does not relate or cannot be traced back to you specifically.
- non-personal statistical information collected and compiled by us; and information that you have provided voluntarily in an open, public environment or forum including any blog, chat room,

community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Common examples of the types of personal information which we may collect, and process include your:

- identifying information – such as your name, or identification number of any kind
- contact information – such as your phone number or email address
- address information – such as your physical or postal address; or
- demographic information – such as your gender or marital status

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- financial information – such as your bank account details.

### **Acceptance required**

Before any supply of goods or services or the customer onboarding, this policy together with our terms and conditions should be accepted by all parties. Failure to do so may result in Pinnacle Micro not being able to provide any goods/ services. By placing orders or requesting our services, you are confirming consent to this policy.

- By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all its terms.
- You may only send us your own personal information or the information of another data subject where you have their permission to do so.

### **Changes**

We may change the terms of this policy at any time by updating our web page.

### **Collection Of Data**

#### **On registration**

Once you register with Pinnacle Micro (Pty) Ltd, you will provide us with certain information that will then be made visible to us, this personal information will include your name and surname, email address, telephone numbers, your company name, company registration number, and VAT number, postal address or street address and your username and password. We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy. When you order our goods or request services from us, you will be asked to provide us with additional information on a voluntary basis (goods or services information).

## From Browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information).

Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites.

Accordingly, a subsequent website that collects URL information may log some personal information.

## Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve several useful purposes for you, including helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary.

## Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

## Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ab banner) can act as a web beacon. Our web beacons do not collect, gather, monitor, or share any of your personal information. We merely use them to compile anonymous information about our website.

## Optional Details

You may also provide additional information to us on a voluntary basis (optional information).

This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

## Recording Calls

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

## Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services
- **marketing purposes** – such as pursuing lawful related marketing activities
- **business purposes** – such as internal audit, accounting, business planning and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance

we may use your usage information for the purposes described above and to:

- remember your information for that you will not have to re-enter it during your visit or the next time you access the website
- monitor website usage metrics such as total number of visitors and pages accessed
- track your entries, submissions and status in any promotions or other activities in connection with your usage of the website

## Consent to collection

we will obtain your consent to collect personal information in accordance with applicable law and when you provide us with any registration information or optional information.

## Use

### Our obligations

We may use your personal information to fulfil our legal obligations to you as our customer in providing good and services and to send relevant and appropriate electronic correspondence to you to keep you informed regarding, but not limited to, news about goods and services in which we may think that you are interested in

### Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages of which you can choose to opt-out of.

## OR

We may send administrative messages and email updates to you about the website. We will not send you promotional messages unless you have chosen to opt-into them. But we may send you one message asking you to opt-into promotional messages.

### Targeted Content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser can collect your personal information.

### Disclosure

#### Sharing

In general, we do not share your personal information however we may share your personal information with third parties that act as service providers on our behalf as permitted by law

- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contract dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit)
- credit bureaus to report account information, as permitted by law
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (if you utilize the services to receive payments and you meet their criteria)
- other third parties who provide us with relevant services where appropriate

### Regulators

We may disclose your personal information as required by law or governmental audit.

### Law Enforcement

We may disclose personal information if required:

- By subpoena or court order
- To comply with any law
- To protect the safety of any individual or the public
- To prevent violation of our customer relationship terms

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy. For Marketing Purposes, we may disclose aggregate statistics (information about the customer population in general terms).

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, accounting, audit, compliance, information technology, or other personnel.

## **Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## **Security**

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

## **Accurate and up to date**

We will try to keep the personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information. You can review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

## **Retention**

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorized by law; or
- you have consented to the retention of the record

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

## **Transfer to another country**

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting

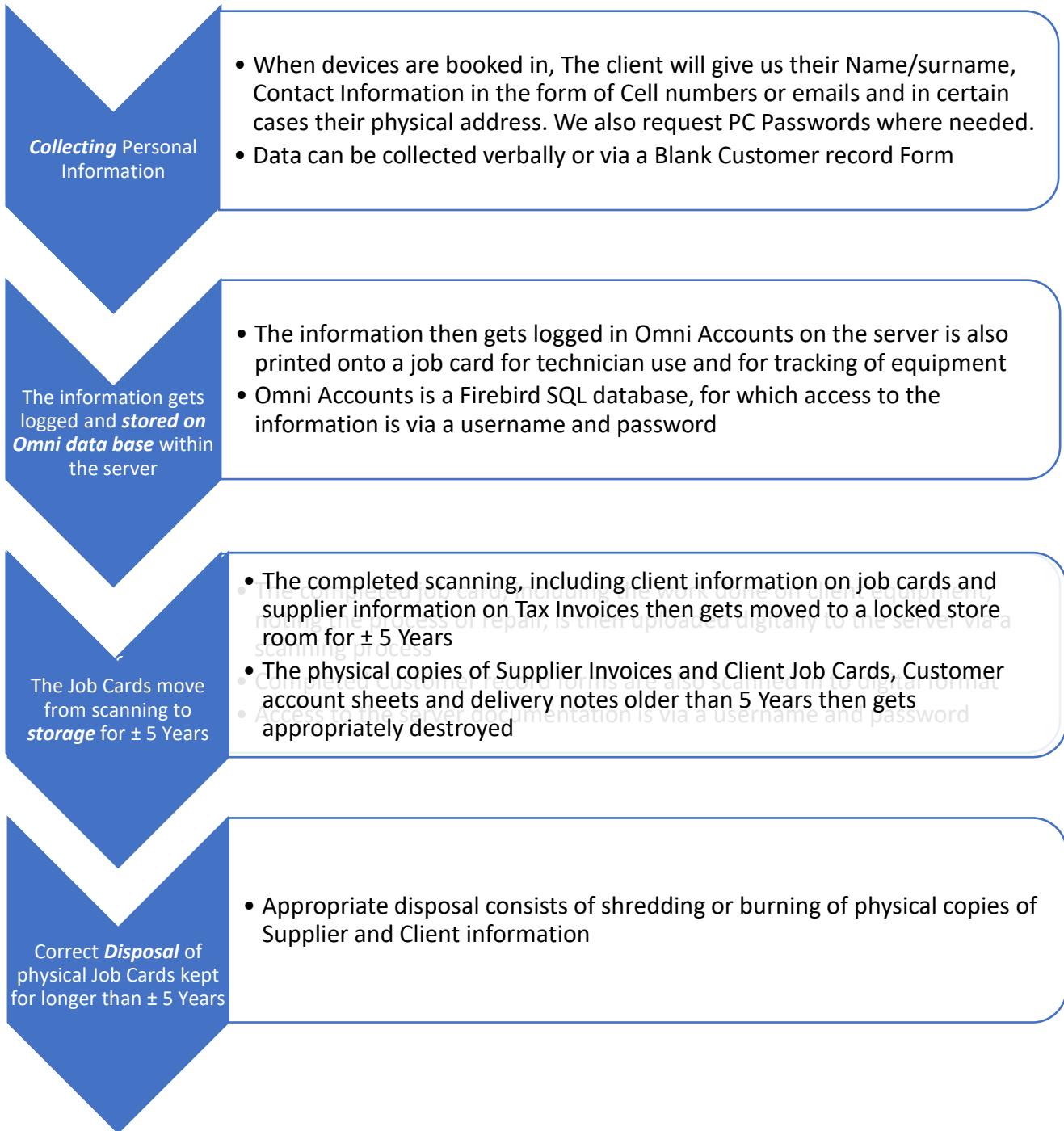
personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less

### **Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

**PTO**

### Collection of Personal Information for iTFuture use:





## Locations of Client & Supplier Information Within iTFuture:

### Physical Locations

- iTFuture is located at 25 Cove street, central Knysna.
- iTFuture runs a Windows Server 2019 Server, which is located in a locked (when building is unoccupied) strongroom. All stored paperwork is also stored within this strongroom

### Omni Accounts

- **Omni Database:** Customer Accounts include Telephone/Cellphone Numbers, Email Addresses, Physical Addresses, Invoicing history, Purchase history
- **Omni Physical Copy of Job Cards/ Customer Record Cards:** Contains Contact information, Physical Address of regular clients, Email Addresses, Passwords for Logins to the machine itself, Microsoft details and network logins

### Server

- **Customer Docs:** Client information includes Wi-Fi Passwords, Network Passwords, Microsoft Office Details & Passwords, Data base for POS setups, IP Addresses
- **iTFDocs:** General Information related to running of the business. There may be customer information
- **Staff Information:** Staff personal Information including contact details, Identification Card Scans, Drivers Scans is stored in a separate location, only accessible by Admin usernames and passwords

## Regulations & Preventative measures to protect sensitive information:

### Preventative measures in place:

#### Omni Accounts

- **Omni Database:** Omni can only be accessed by staff machines which all have passwords. There are also folders within the Omni Database that can only be accessed by Greg, The Owner, which is password protected.
- **Omni Physical Copy Of Job Cards:** Only staff members have access to the job card information during the job process. After the process of invoicing and scanning\*, the documentation then gets moved to a locked storeroom where it is held for ±5 Years

#### Server

- **Customer Docs:** This folder contains client sensitive information and therefore is password protected.
- **iTFDocs:** This Folder contains staff sensitive information and therefore is password protected.

#### Network

- Due to connecting client machines to the “iTFuture” Internet connection to complete downloads and load software from the server for repair jobs and servicing, clients can gain access to the server if the connection is not “Forgotten” by the technician responsible for the machine. Therefore, it is regulation for technicians to “Forget” the network details on clients’ machines on completion of the job.

## Contracted Staff and Their Responsibility to Follow POPIA Procedures:



### Staff Liability

- Staff that have signed contracts have accepted the responsibility to follow the POPIA procedures to protect and lawfully use the client information given for only appropriate uses such as contacting clients on completion of jobs as well as client passwords to access the machine to do repair/servicing needed. Contracted staff also accept the responsibility, upon signing the contract, to not access client folders and information unless otherwise stated by the client.

## Procedures in place to protect client information from accidental loss or damage:



### Loss Prevention

- When technicians perform data transfers and/or clones, it is the technician's responsibility to back up the data before any data manipulation or transfers occur should there be any failures or corruption of data during the data transfer process.

**CONSENT**

I, \_\_\_\_\_ as (designation eg. director)

\_\_\_\_\_ hereby give my consent to Into the Future CC to collect, process, and distribute my personal information where Into the Future CC is legally required to do so.

I understand my right to privacy and the right to have my personal information processed in accordance with the conditions for the lawful processing of personal information.

I understand further that all my personal information which I provide to Into the Future CC Ltd will be held and/or stored securely for the purpose for which it was collected.

I undertake to immediately advise Into the Future CC of any changes to my Personal Information should any of these details change.

Signed on this the \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

For and on behalf of: \_\_\_\_\_