

CHALLENGE IT CC T/A ABSOLUTE CLOUD SOLUTIONS' PRIVACY AND PERSONAL INFORMATION POLICY

Challenge IT t/a Absolute Cloud Solutions (Reg:1998/018359/23) ("**Absolute Cloud Solutions**") adheres to the highest standards of protecting your personal information when we process it by virtue of your use of our Services, your use of our website www.absolutecs.co.za & www.ilogs.absolutecs.co.za or any related IT tools, related ticket logging, websites, applications or platforms (collectively, "**the Website**"), when contracting with us or by providing us with your personal information in any other way. As such, we have created this specific and detailed Privacy Policy ("**Policy**") for you to read and appreciate exactly how we safeguard your personal information and respect your privacy.

- For more information regarding your personal information lawfully stored or used by Absolute Cloud Solutions, please contact popia@absolutecs.co.za.
- Please ensure that you read all the provisions below, and any other Absolute Cloud Solutions terms and conditions which apply and may be updated from time to time, to understand all your, and our, rights and duties.

Index

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected
4. How we use your personal data
5. Transborder transfers
6. Data security
7. Data retention
8. Your legal rights

1 Important information and who we are

1.1 Purpose of this Privacy Policy

1.1.1 This Privacy Policy aims to give you information on how Absolute Cloud Solutions collects and processes your personal data through any form of your engagement with Absolute Cloud Solutions, such as when you provide your third-party services to us, or correspond with us, use our Services, access or use the Website, or provide us with your personal information in any other way.

1.1.2 This Privacy Policy complies with, and facilitates the obligations required from the South African Protection of Personal Information Act, No. 4 of 2013 ("POPI"), as amended.

1.2 Role as "Responsible party"

1.2.1 Absolute Cloud Solutions is the "Responsible party" (as defined under POPI) and is responsible for your personal data in instances where we decide the processing operations concerning your personal data.

1.2.2 We have appointed an Information Officer at Absolute Cloud Solutions 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 your legal rights, please contact the representative using the details set out below.

1.3 Organisation Details

1.3.1 Our full details are:

Name	Challenge IT CC t/a Absolute Cloud Solutions
Physical Address	75 Hope Street Cape Town, City Centre 8000
Postal Address	75 Hope Street Cape Town, City Centre 8000
Contact Details	Tel no: 021 461 0909 Email: popia@absolutecs.co.za

1.3.2 Information Officer:

Name	Jason Pretorius
Contact	popia@absolutecs.co.za

1.4 Changes to personally identifiable information

- 1.4.1 We will not know if your personal information changes without you telling us, so please let us know immediately should changes occur. Absolute Cloud Solutions will not be liable for any incorrect personal data it may hold on/about you if you do not notify us of the changes needed.

2 The data we collect about you

- 2.1 Personal data", or "personal identifiable information", means any information about an individual, both natural and juristic entities, from which that entity can be identified. It does not include data where the identity has been removed (anonymous data).
- 2.2 We may collect, use, store and transfer ("process") different kinds of personal data about you which we have grouped together as follows:
 - 2.2.1 **Identity Data** including first name, maiden name, last name, country of residence, username or similar identifier, title, date of birth and gender;
 - 2.2.2 **Contact Data** including email address, social media contact details and telephone numbers;
 - 2.2.3 **Financial Data** including bank account details, payment details and third-party payment provider information;
 - 2.2.4 **Transaction Data** including details about payments to and from you, contracts, contractual terms, contract fees, signups, subscriptions, invoices and other details of products and Services you have obtained from us;
 - 2.2.5 **Technical Data** including internet protocol address/es, your login data, browser type and version, time zone setting and location, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website;
 - 2.2.6 **Device and Service Data** including information about who is logged into/using the device, hardware, software metrics such as CPU or memory usage or security status;
 - 2.2.7 **Usage Data** including information about how you use our company website; and
 - 2.2.8 **Marketing and Communications Data** including your preferences in receiving notices and marketing from us and our third parties and your communication preferences.
- 2.3 We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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, or Device and Service Data to analyse and understand device, server or workstation status. 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.
- 2.4 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 with you (for example, to provide you with our Services).

3 How is your personal data collected?

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

3.1.1 **Direct interactions:** You may give us your **Identity, Contact, Technical and Financial Data** by filling in various Absolute Cloud Solutions forms when contracting with us and/or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you use our Services;

3.1.1.1 log a support incident

3.1.1.2 use our Website;

3.1.1.3 contract with us;

3.1.1.4 use a service that forms part of our technology stack or tools

3.1.1.5 consult with us; provide us with your services;

3.1.1.6 complete forms;

3.1.1.7 request information to be sent to you; or

3.1.1.8 During a service ticket.

3.1.2 **Automated technologies or interactions:** As you interact with our various IT tools, technology stack and/or Website, we may automatically collect **Technical and Usage Data** about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

3.1.3 **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources for example as set out below but not limited to:

3.1.3.1 Technical Data from the following parties:

3.1.3.1.1 *analytics such as Google Analytics based*

3.1.3.1.2 *company and employee information from Microsoft*

3.1.4 Identity, Marketing and Communications Data and Contact Data from publicly available sources.

4 How we use your personal data

4.1 We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand and consent to. Most commonly, we will use your personal data in the following circumstances:

4.1.1 where we have your express consent to do so (where your acceptance of this Privacy Policy constitutes your informed and active consent);

4.1.2 where we need to consult with you or perform on the Services contract we are about to enter into or have entered into with you;

4.1.3 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; and/or

4.1.4 where we need to comply with a legal or regulatory obligation.

4.2 Purposes for which we will use your personal data:

- 4.2.1 To engage with you after you have contacted us requesting an engagement via the Website or otherwise;
- 4.2.2 To provide you with our Services as contracted ;
- 4.2.3 To contract with you as a service provider and/or creditor/debtor to Absolute Cloud Solutions;
- 4.2.4 To allow you to use the Website / technology stack / service tools;
- 4.2.5 To use data analytics to improve our Website & Services;
- 4.2.6 To provide relevant consulting services.

4.3 Marketing

- 4.3.1 You may receive marketing communications from us if you are under contract with us or have accepted our Privacy Policy.
- 4.3.2 You may receive marketing communications from us if we have located your information from publicly available sources.
- 4.3.3 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising, and the opportunity to opt out of any marketing and advertising from us and have your personal data removed.

5 Planned Transborder Flows of Personal Information

- 5.1 ACS may transfer personal information to a third party who is in a foreign country in order to administer certain services but may only do so subject to the provisions of POPIA requiring data subject consent. Thus, internal cross-border transfers, as well as external cross-border transfers of information are envisaged, subject to the provisions of POPIA.

6 Data security

- 6.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed, and used or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality as per their individual contract terms with Absolute Cloud Solutions.
- 6.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7 Data retention

- 7.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 7.2 In some circumstances you can ask us to delete your data; see below for further information.

8 Your legal rights

8.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data where we are the relevant “Responsible Party” over such personal data. Please contact us to find out more about, or enact, these rights (PAIA):

- 8.1.1 request access to your personal data;
- 8.1.2 request correction of your personal data;
- 8.1.3 request erasure of your personal data;
- 8.1.4 object to the processing of your personal data;
- 8.1.5 right to withdraw consent.

8.2 You will not have to pay a fee to request confirmation that the responsible party holds personal data about you. However, we may charge a reasonable fee if your request is for a record of all data held. Alternatively, we may refuse to comply with your request in certain conditions as per PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000.

8.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data.