

## Introduction

Welcome to our privacy policy. We are W PROFESSIONAL LEARNING PTY LTD, registration no 2010/013349/07, and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal data very seriously. The purpose of this policy is to describe the way that we collect, store, use and protect data that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (personal data).

We have updated this policy to comply with the European Union's General Data Protection Regulation (GDPR) and South Africa's Protection of Personal Information Act (Popia).

## Audience

This policy applies to you if you are:

- a visitor to our website; or
- a customer who has ordered, registered for or uses the services that we provide.

## Personal data

Personal data includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

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 data subject to protection under this policy).

## Common examples

Common examples of the types of personal data we may collect and process include your:

- identifying information – such as your name, date of birth, 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;

#### Acceptance of this policy

#### Acceptance required

You must accept all the terms of this policy when you register for, or use the website or any of our services. If you do not agree with anything in this policy, then you may not register for or use the website or any of our services. You may not register for or use the website or any of our services if you do not accept this policy.

#### Legal capacity

You may not access our website or order our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

#### Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

#### Your obligations

You may only send us your own personal data 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 this web page. We will notify you of any changes by placing a notice in a prominent place on the website, or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our services. If you continue to use the website or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

#### Collection of data

#### On registration

Once you register on our website, you will no longer be anonymous to us. You will provide us with certain personal data.

This personal data will include:

- your name and surname;
- your email address; and
- your username and password.

We will use this personal data 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.

On order

When you order any services from us, you may be asked to provide us with additional information on a voluntary basis (services information). This information may include:

- your Email address;
- your postal address or street address; and
- your telephone number.

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 you visited before entering our website might place personal data 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 data.

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.

We may use or process any 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 data, disclosing it, and combining it with other personal data. We generally collect and process your personal data for various purposes, including:

- services purposes – such as providing our services;

- 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.

#### Consent to collection of data

We will obtain your consent to collect personal data:

- in accordance with applicable law;

- when you provide us with any registration information or optional information.

#### Use of data

#### Our obligations

We may use your personal data to fulfil our obligations to you. This could include reminders for events we offer, allowing you to access exclusive content on our website, billing you for our services, or improving our offerings.

#### Messages and updates

We may send administrative messages and email updates to you about the website. We may wish to provide you with information about services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt in to receive them. You can choose to opt out of receiving promotional messages.

#### Regulators

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

#### Law enforcement

We may disclose personal data if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

#### No selling

We will not sell personal data. No personal data will be disclosed to anyone except as provided in this privacy policy.

#### Employees

We may need to disclose personal data to our employees that require the personal data to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel. Any of our employees or personnel that handle your personal data will have signed non-disclosure and confidentiality agreements.

#### 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 data we process to a successor, purchaser or separate entity. We will disclose the transfer on the website. If you are concerned about your personal data migrating to a new owner, you may request us to delete your personal data.

#### Security

We take the security of personal data 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 authorise access to personal data 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 data 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 data on the website. You are able to review or update any personal data that we hold on you by accessing your account online, emailing us or phoning us.

Please note that in order to better protect you and safeguard your personal data, we take steps to verify your identity before granting you access to your account or making any corrections to your personal data. Throughout your interaction with us you retain the right to rectify personal data that is incorrect or inaccurate. This does not apply if we process your personal data in our capacity as an operator or processor on behalf of a responsible party or data controller.

#### Retention of data

We will only retain your personal data 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 authorised by law; or
- you have consented to the retention of the record.

Without limiting the above, we may store the following types of personal data for the following durations:

- account and subscription data – 5 years after the most recent transaction;
- business intelligence – 36 months;
- customer service communications – 7 years.

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

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

#### Transfer to another country

We may transmit or transfer personal data outside the country in which it was collected to a foreign country and process it in that country. Personal data may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal data may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal data in a foreign country whose laws regarding processing of personal data may be less stringent.

## Updating or removing

You may choose to correct or update the personal data you have submitted to us, by clicking the relevant menu in any of the pages on our website or contacting us by phone or email (please also see additional information under Enquiries).

You are entitled to a right to be forgotten. We will delete any personal data that you don't want us to have. If you do this, we will remove your personal data from our system, but we may still retain certain personal data as required or allowed by law, including:

- where we can show legitimate grounds for processing your personal data that override your request; or
- where we process your personal data in order to establish, exercise or defend legal claims.

You understand that if we delete your data from our system, we may be unable to continue providing some or all of our services to you.

If you are a data subject of one of our customers (who is the data controller), then you must submit your request to the relevant data controller who will then delete your personal data.

## Restriction of processing

You may request that we restrict the use of your personal data. When we restrict your personal data we still have the right to store it but not use it. You can ask that we do this verbally or in writing (which writing may be in an electronic form) via the forums described in this policy. We will respond to the request within 30 days.

## Data portability

If you should wish to transfer your data from us to another data controller, we will facilitate this transfer. We will pass on all of our personal data to the data controller.

If you are a data subject of one of our customers (who is the data controller), then you must submit your request for your personal data to the relevant data controller, who will then export your personal data as a Microsoft Excel or CSV file.

## Data breaches

We will notify our customers of any confirmed data breaches that has occurred. It is our customers' responsibility to notify relevant supervisory authorities and any affected data subjects of the data breach.

#### Limitation

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

#### Enquiries

If you want to update or remove your personal data, restrict how we process it, or opt in or out of receiving newsletters or other promotional content, please contact us:

Telephone: 011 568 0370

Email: [info@wconsulting.co.za](mailto:info@wconsulting.co.za)

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal data, please contact our data protection officer via one of the following methods:

Telephone: +27 11 568 0370

Email: [info@wconsulting.co.za](mailto:info@wconsulting.co.za)

Post: Data Protection Office, PO Box 5486, Rivonia, Johannesburg, 2128

#### Complaints

If you have any complaints about the way we handle your personal data, please contact our data protection officer as described above, so that we can resolve it. You may choose, however, to approach a supervisory authority instead, including:

the data protection authority in your jurisdiction, where you are covered by the EU GDPR; or

the South African Information Regulator.