



SPUR CORPORATION LIMITED (“SPUR”)

WEBSITE PRIVACY POLICY

DOCUMENT HISTORY

Version	Approvers	Role	Name & Surname	Signed	Approval Date
1.0	Exco / Spur Corp Board	Document Owner	Exco / Spur Corp Board		
1.0	Legal Department	Reviewer	Duane Starkey		
1.0	IT Department	Reviewer	Dominique Bolus		
1.0	CEO	Approver	Valentine Nichas		

VERSION CONTROL

Version	Date	Prepared By	Material Changes	Reviewed By
1.0	05/02/2021	Duane Starkey	Annual review of the Policy to align with best practice	Duane Starkey (Head of Legal)

1. INTRODUCTION

This website privacy policy describes how we process information we collect and/or receive from you.

2. INFORMATION WE COLLECT AND RECEIVE

We collect and receive information about you in the following ways:

2.1. Information provided by you. We may collect personal information (that is information about you that is personally identifiable like your name, address, gender, e-mail address, physical address, phone number(s) and other unique information such as product and service preferences and contact preferences that are not otherwise publicly available) to the extent that you provide us with same; and

2.2. Information that is collected automatically. We receive and store information which is transmitted automatically and this information includes information from cookies, your Internet Protocol ("IP") address, browser type, web beacons (which are electronic files that allow a web site to count users who have visited that page or to access certain cookies), embedded web links, and other commonly used information-gathering tools.

2.3. Information you give us

This includes any information that you provide to us directly:

2.3.1. when you sign-up to utilise our services;

2.3.2. by filling in forms on our websites, or those provided to you;

2.3.3. when you enter a competition, promotion or complete a survey;

2.3.4. by posting comments or content on our social media pages; or

2.3.5. when you contact us or we contact you and you provide information directly to us.

2.4. What personal information we collect

2.4.1. When you register to use our services, you may be required to provide us with the following information, your:

2.4.1.1. name and surname;

2.4.1.2. contact number and email address;

- 2.4.1.3. physical address;
- 2.4.1.4. identity or passport number; and
- 2.4.1.5. date of birth.

2.5. **Information we collect or receive when you use our website or social media platforms**

We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive:

- 2.5.1. log information;
- 2.5.2. information we infer about you based on your interaction with products and services;
- 2.5.3. device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address);
- 2.5.4. location information.

2.6. **Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

3. **HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

We use the information we collect and receive for the following general purposes:

- 3.1. to provide you with information, products or services you request from us;
- 3.2. in order to refer you to an appropriate third-party service provider;
- 3.3. to communicate with you;
- 3.4. to provide you with support; and
- 3.5. to provide effective advertising (for example to provide you with news, special offers and general information about other goods, services and events which we offer, that are similar to those that you have already hired or enquired about).

4. **HOW WE SHARE THE INFORMATION WE COLLECT AND RECEIVE**

- 4.1. We don't sell your personal information to third parties for their marketing purposes.
- 4.2. We may share information with:
 - 4.2.1. our affiliates, in other words, other companies in our group;
 - 4.2.2. we may disclose your personal information to a limited number of our employees and third party service providers (other than those who we refer you to), who we assist you to interact with;
 - 4.2.3. our business partners. We may share non-personally identifiable information with select business partners;
 - 4.2.4. other parties in response to legal process or when necessary to conduct or protect our legal rights;
 - 4.2.5. companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you; and
 - 4.2.6. third-parties where you provide consent. In some cases, third-parties (often advertisers) may wish to attain information about you in order to promote their products to you, or for whatever other reason. We may share information with third-parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what data would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your data; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

5. **YOUR RIGHTS**

- 5.1. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.
- 5.2. Our websites use cookies. If you wish to reject our cookies, you can configure your browser to do so.

5.3. We want to make sure that any data we hold about you is up to date. So, if you think your personal information is inaccurate, you can ask us to correct or remove it.

6. **RETENTION OF DATA**

We will retain your personal information only for as long as is necessary for the purposes set out in this privacy policy or to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

7. **OUR COMMITMENT TO SECURITY**

The security of your data is important to us. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use up to date technology that will help us to do this. We will at all times comply with our obligation under applicable law.

8. **TRANSFER OF DATA**

8.1. We are based in and operate from South Africa. Your information, including personal information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.

8.2. We might transfer your personal information to places outside of South Africa and store it there, where our suppliers might process it. If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.

8.3. Your use of our website, followed by your submission of information to us, represents your consent to such transfer.

8.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

9. **LINKS TO OTHER WEBSITES**

Our website or social media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the

privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects personal information.

10. **CHANGES TO THIS PRIVACY POLICY**

We may update this privacy policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting.

11. **ACCESS TO YOUR PERSONAL INFORMATION**

11.1. You may at any time request:

11.1.1. confirmation that we hold your personal information;

11.1.2. access to your personal information;

11.1.3. the identities or categories of third parties to whom we have disclosed your personal information; or

11.1.4. that we correct or delete any personal information that is incomplete, misleading, inaccurate, excessive or out of date.

11.2. Requests may be made in writing to informationofficer@spurcorp.com