



## CT LAB (PTY) LTD CLIENT INFORMATION PROCESSING POLICY

We are committed to protecting your privacy. We respect your rights to your personal information. For this reason, we have developed this policy to govern our processing of your personal information. This document sets out:

- (a) How we collect your personal information;
- (b) What types of personal information we collect and hold about you;
- (c) The purposes for which we use such personal information;
- (d) Your rights to your personal information held by us.

### Who we are

When we refer to “we”, “us” or “our” herein we are referring to CT LAB Pty (Ltd) (Registration Number 2000/008334/07) and its affiliated group companies, or any of them, as the context requires, as well as our successors in title. Our principal place of business is at 15 Thermo Lane, Technopark, Stellenbosch, South Africa but we recommend you contact us via telephone at +27 (0)21 880 1088 or electronic mail at [info@ctlab.com](mailto:info@ctlab.com).

### How we collect information

We collect information about you directly from you as well from third parties and publicly accessible sources in certain cases. The means and sources we use to collect information about you is as follows:

- (a) From you, when you make use of our website, place an order or enquiry with us for our products, as well as when you subscribe to our newsletters or consent to receiving communications from us;
- (b) From public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) From our business partners and the persons employed by us to provide services for us, which may include debt collection services, communications services and data hosting, processing and management services;
- (d) From such persons or entities which may be legally entitled to provide us with information about you; and
- (e) From persons or entities which you may consent to providing us with information about you.

### Information we hold about you

We record and hold the following types of information about you:

- (a) Details of when you contact us and when we contact you, including the IP addresses when you contact us via electronic mail or through our website, electronic mail addresses and telephone numbers you contact us from as well as the content of the communications between us, which we may record;
- (b) All information contained in the forms, requests or orders you submit to us, via electronic mail, our website or using any other means;
- (c) Details about you which you provide to us to enable us to process your orders or requests for our products, including your name, contact details, age, identity number and place of residence;
- (d) Information received pursuant to our enquiries with public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (e) Details of your preferences regarding our products, including what products you have purchased from us or have made enquiries with us about.

We may hold your information collected hereunder for as long as may be required to complete your subscriptions or orders for products or services and for at least five years thereafter or such longer period as may be required or permitted by law.

### Information which we collect and the purposes for which use such information

Certain of the information which we collect about you, as identified below, we need to use to be able to consider your requests for the supply of our products and to comply with and to exercise our rights under the agreements which we have concluded with you. If we do not have the right to use such information we will not be able to process your requests or comply with our obligations to deliver our products to you. Such information includes:

- (a) Your name, contact details, age, identity number, place of residence and records relating to invoices and requests for payment which we have provided to you, as well as details regarding amounts which you have paid to us and which may be outstanding;
- (b) The information about you which we have received from public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (c) The information which you and third parties have provided to us which we need to verify that the information which we have received from or about you are accurate, complete and up to date.

Other information about you which we hold and which we do not need for the purposes stated above, and which we make use of based on your consent, will be used by us only for the purposes duly agreed to by you. We may also use information we hold about you for purposes required by or as permitted under applicable law.

## Sharing your information

Keeping your personal information secure is one of our most important responsibilities. We cannot disclose your information unless legally permitted thereto. Save as set out below, we will not transfer your information to a third party without your consent unless legally obliged thereto. In particular, we do not sell lists or databases with our clients' information and will not provide any of your information to entities outside our group so as to permit them to market their products or services to you. You agree that we may transfer your information to the following people and organisations in pursuit of the data processing purposes set out in this policy:

- (a) To all persons in our employ or in the employ of our affiliated companies, including to our directors, employees, contractors, agents, auditors, legal and other professional advisors and of our affiliated companies;
- (b) To governmental, judicial, regulatory and law enforcement bodies and agencies, including the South African Revenue Services and the National Credit Regulator;
- (c) To persons employed by us to provide services on our behalf that adhere to principles similar to ours regarding the treatment of your information, including delivery, debt collection, data hosting, processing and management services;
- (d) To any person to whom we cede, delegate, transfer or assign any of our rights or obligations pertaining to the products or services provided to you or contracts concluded with you;
- (e) To any person that acts as your legal guardian, executor of your estate, curator or in a similar capacity;
- (f) To such other persons as may be permitted by applicable law or that you may consent to.

## Location of your Personal Information and Security

Our servers and systems on which we store your personal information are located in the Republic of South Africa. You should be aware that the laws of South Africa may not offer equivalent data protection mechanisms regarding the use of your personal information as those enforced in your country of residence (if other than the Republic of South Africa). Please note that our sharing of your information as described above may involve the transfer thereof to third parties located outside of South Africa. Nevertheless, we will protect your personal information on the basis described in this policy.

We will strive at all times to ensure that your records will always be protected against unauthorised or accidental access, processing or loss. We maintain this commitment to data security by implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we use a third party to host, manage or process your data on our behalf we will require that such third party also commit to implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we are not prevented by a law enforcement or regulatory agency, we will notify you without undue delay if we believe that unauthorised access to your information may have occurred, providing you with such information as you may reasonably require to implement protective measures.

## Web Sites

When you visit our website your web browser will provide us with certain information about you. Such information will be stored in a cookie on your computer's hard drive by your web browser. Cookies are intended to assist and improve your use of our web sites. Certain cookies which we use are essential to the correct operation of our website and allow you for instance to navigate our website, access secure areas of our website and make use of the basic functionalities of our website. This website cannot function without these cookies being enabled.

We also use cookies which collect information about what you looked at, which browser you used to view the pages, your page requests and details of the device which you used to access our website, including your IP address (the unique number which your machine uses when it is connected to the Internet). We may use this information to improve your browsing experience and personalise the content and ads which we make available to you as well as to provide you with information which we believe may be of interest to you. Although these cookies improve your ability to use our website, we do not require that you agree to our use of them as a condition to your use of our website. We will therefore give you the option of disabling these "non-essential cookies". You can change these settings at any time. You will usually also be able alter the settings of your browser to prevent automatic acceptance. Please be aware that if you choose not to accept any cookies you may not be able to use all the features of our websites.

## Your rights regarding your information

Provided that you give us suitable and adequate proof of your identity, you have the right:

- (a) To know which records we hold about you;
- (b) If processing by us of your personal information is based on your consent, to withdraw such consent at any time, provided that this shall not affect the lawfulness of processing which occurred prior to such withdrawal;
- (c) To object to the further collection, use, sharing or processing of your personal information by us at any time where such processing activities are not required by us to comply with our obligations under any agreement we have with you, to exercise our rights, or for such other purposes as may be required or permitted by applicable law;
- (d) to require us to correct, erase or cease processing information or records we hold about you that is used by us based on your consent, or that we are no longer permitted to retain, or which are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained; and
- (e) To request that we provide you with records of your personal information which has been collected and processed by us using automated means.

Any of the above can be done by contacting us directly by any means provided by us, including by submitting a written request to us via email at [info@ctlab.com](mailto:info@ctlab.com). We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.