

25 June 2021 Y-Grow Pty Ltd – POPIA Code of conduct

This privacy policy sets out how we use and protect any information that you give when you use this website. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement. We may change this policy from time to time by updating this document indicating the last update by referring to the date. You should check this document from time to time to ensure that you are happy with any changes.

1. PART 1 – YOUR RIGHTS TO YOUR PERSONAL INFORMATION

As outlined by the Information Regulator of South Africa, you (a data subject) have a right in how your personal information is stored by businesses. This pertains to:

- A. Records of your personal information collected by companies, whether it be collected by automated or non-automated means.
 - i. Records including name, identification number, mobile phone number, location.
- B. Companies which have collected your personal information is responsible for
 - i. Keeping your personal information safe within the Republic of South Africa i.e. domiciled in the Republic, where possible.
 - ii. Keeping your personal information safe when it leaves the Republic, whether that happens by automated or non-automated means.

- iii. We will take every effort to keep your data on South African soil, which aligns with our core principle of keeping data local.

C. Personal information may only be held by companies for a maximum of two years.

- i. To ensure your data doesn't sit around, it will be safeguarded by us and deleted within two years.

2. PART 2 – HOW WE COLLECT, PROCESS, AND STORE YOUR PERSONAL INFORMATION

We collect as little personal, identifiable data about you as possible. Our core principles of privacy are:

- A. Explicit consent: before we collect and store information about you, we will inform you exactly what we're collecting about you. Explicit consent can take the form of filling in forms, ticking boxes, or providing opinions.
- B. Keeping data local: we take every measure to keep your data collected by our services within South Africa, stored on South African soil. Where we can't store or process data on South African equipment (like data processing in the cloud), we will make it known before data collection takes place.
- C. Freely given opinions: you will not be pressured into consenting for giving over any part of your personal information. If a required field makes you feel uncomfortable, feel free to exit the survey at any time and all your personal information collected to that point will be disposed.

D. Freedom of personal data removal: at any point, you can request our data officers to remove your personal data from our systems and services.

3. PART 3 – WHAT WE MAY COLLECT, HOW IT WILL BE COLLECTED AND WHY IT MAY BE COLLECTED

When running our services, we may collect the following data points:

A. Explicit data points i.e. our services will ask you to fill these in and are not collected implicitly:

3.1 First name, middle name, and/or last name

3.2 Contact details, including email address and/or phone number.

3.3 Location details, including the address or city/town/municipality of your workplace; and/or the address or city/town/municipality where you live.

3.4 Your place of work, including (but not limited to) business/operating sector, and/or nature of business, your role in business, team and leadership challenges and company size.

3.5 Demographic information, including (but not limited to) gender identity, age or age group, race, home language and/or additional languages, and occupation. These are the details that are required to be submitted as part of the Skills levy in South Africa.

3.6 Your personal opinions toward a product, service, or situation.

3.7 Your academic background, your expectations for a course and course requirements.

3.8 Your rating and feedback of a course -which with your consent may be used as a testimonial on our website or in proposals to clients.

3.9 Other information related to customer surveys an or offers.

What we do with this information we gather:

- For internal record keeping
- We may use the information to improve our products and services
- We may periodically send promotional emails about new products, special offers or other information you may find interesting using the email address which you have provided.
- From time to time we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

4 Part 4: HOW WE USE COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

5 Part 5 LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

6 PART 6– WHERE YOUR DATA MAY RESIDE, AND WHERE IT MAY BE PROCESSED

When we collect and process your data, we may store your data on:

6.1 Our elected servers, which reside in:

1-Grid in Cape Town, South Africa. This data is safe guarded with strong, unique passwords, backed with time-based second factor authentication.

6.1 On site computers, which reside in:

6.1.1 One computer in Johannesburg, South Africa.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

7 PART 7 – WHO TO CONTACT FOR QUERIES AND CONCERNS

Our South African data officer is available for requests, queries, and concerns:

7.1.1 Principal data officer: Yoke van Dam

7.1.2 Email: yokevandam@y-connect.biz

7.1.3 Contact number: 076 7900 582