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Protection of Personal Information Act, No. 4 of 2013

Information Technology Privacy Policy

This policy was prepared in accordance with the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This policy applies to:

LADY JANE QUILTING (PTY) LTD

Registration number: 2020/651694/07

1 July 2021

Registered office address: 6 Milkwood Street, #7 Protea Park, Rangeview, 1739, Gauteng

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1. Introduction

1.1 LADY JANE QUILTING(Pty) Ltd is committed to protecting and respecting users' privacy when utilising LADY JANE QUILTING (Pty) Ltd's electronic information and communication systems.

1.2 In terms of the Protection of Personal Information Act, No. 4 of 2013 (the Act), LADY JANE QUILTING (Pty) Ltd will be responsible for the protecting and respecting of the users' electronic information and communication systems.

2. Definitions

2.1 'Users' mean all persons including, but not limited to, permanent or temporary employees, directors, consultants, contractors and trainees who have access to, or use of, LADY JANE QUILTING (Pty) Ltd's electronic information and communication systems.

2.2 'Cookies' are small amounts of data generated by a website and saved by your web browser. Its purpose is to remember information about you, similar to a preference file created by a software application. While cookies serve many functions, their most common purpose is to store login information for a specific site.

2.3 An 'IP address' is a set of numbers assigned to a user's computer during a browsing session. It is activated whenever the user logs onto the Internet via his/her Internet service provider or network.

2.4 'Information Security Officer' is the person appointed and employed by LADY JANE QUILTING (Pty) Ltd to enforce and manage this policy.

2.5 'Policy' means this IT Privacy Policy.

2.6 Reference to 'consent', 'your consent' or 'your explicit consent' include the clicking of 'application' or 'submit' button or 'I agree' button on LADY JANE QUILTING (Pty) Ltd's website.

3. Scope

3.1 This policy sets out the guidelines and principles that will govern how LADY JANE QUILTING (Pty) Ltd collect and process any personal information collected from users or provided by users to LADY JANE QUILTING (Pty) Ltd.

3.2 A copy of this policy should be available at all times on the LADY JANE QUILTING (Pty) Ltd website.

4. How LADY JANE QUILTING (Pty) Ltd collects information from users

4.1 Users may provide LADY JANE QUILTING (Pty) Ltd with personal information while completing either online forms or any other forms and documents at any LADY JANE QUILTING (Pty) Ltd site or offices or by means of telephonic conversation, email or any other communications channel. This includes information provided to LADY JANE QUILTING (Pty) Ltd:

4.1.1 during enrolment;

4.1.2 by completing a contact document;

4.1.3 by subscribing to services;

4.1.4 by participating in social media forums on/or linked to LADY JANE QUILTING (Pty) Ltd websites;

4.1.5 by completing a survey, and

4.1.6 by reporting a problem regarding LADY JANE QUILTING (Pty) Ltd websites.

4.2 With each visit to LADY JANE QUILTING (Pty) Ltd websites, LADY JANE QUILTING (Pty) Ltd automatically collect the following information:

4.2.1 Technical information, including the Internet Protocol address ('IP address') used to connect a user's computer to the Internet, their login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

4.2.2 Information about user's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site, date and time, services/products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information such as scrolling, clicks and mouseovers, methods used to browse away from the page and any phone number used to call our customer service number.

4.2.3 Cookies

4.2.3.1 Cookies may be used by LADY JANE QUILTING (Pty) Ltd to understand better how users navigate and use our site.

Cookies allow LADY JANE QUILTING (Pty) Ltd to determine how frequently particular pages are visited, the most popular areas of its site and how frequently particular pages are visited. Cookies also allow LADY JANE QUILTING (Pty) Ltd to make its sites more user friendly, for example, permanent cookies allow LADY JANE QUILTING (Pty) Ltd to save the user's password so that the user does not have to re-enter it every time he/she visits its site.

4.2.3.2 Cookies do not contain personal information such as users' home address, telephone number or credit card details. However, personal information that LADY JANE QUILTING (Pty) Ltd stores about users, as per 4.2.3.1 may be linked to the information stored in and obtained from cookies. LADY JANE QUILTING (Pty) Ltd does not exchange cookies with any third-party websites or external data suppliers.

4.2.3.3 Users' browser generates other information, including which language the website is displayed in and their IP addresses. Users' IP addresses are automatically logged by LADY JANE QUILTING (Pty) Ltd's servers and used to collect traffic data about visitors to its websites. LADY JANE QUILTING (Pty) Ltd does not use IP addresses to identify users personally.

4.2.3.4 LADY JANE QUILTING (Pty) Ltd only keeps cookies for the duration of their visit to its site.

4.3 Information LADY JANE QUILTING (Pty) Ltd receives from other sources

4.3.1 LADY JANE QUILTING (Pty) Ltd may receive information about users if they use any of the other websites LADY JANE QUILTING (Pty) Ltd operates, other services LADY JANE QUILTING (Pty) Ltd provides or where users have authorised LADY JANE QUILTING (Pty) Ltd to collect information from selected third parties, e.g. photographers used at events.

4.3.2 LADY JANE QUILTING (Pty) Ltd will inform users that it may be shared internally and combined with information collected on LADY JANE QUILTING (Pty) Ltd's website.

4.3.3 LADY JANE QUILTING (Pty) Ltd may also obtain information from the third parties with whom it works closely, such as, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies.

5. Uses made of the information

5.1 When given information, LADY JANE QUILTING (Pty) Ltd will solely use the information to:

5.1.1 carry out day-to-day administration needs arising from any contracts entered into between a user and LADY JANE QUILTING (Pty) Ltd and provide users with the information and services they request from LADY JANE QUILTING (Pty) Ltd;

5.1.2 provide users with information about company's business and associated matters;

5.1.3 provide users with information about other services offered similar to information previously acquired or enquired about;

5.1.4 provide users with information about LADY JANE QUILTING (Pty) Ltd's activities;

5.1.5 notify users about changes to LADY JANE QUILTING (Pty) Ltd's services;

5.1.6 ensure that content from LADY JANE QUILTING (Pty) Ltd's site is presented in the most effective manner for a user, and

5.1.7 deal with enquiries and complaints made by or about users relating to LADY JANE QUILTING (Pty) Ltd's site or other services users use.

5.2 When collecting information about users, LADY JANE QUILTING (Pty) Ltd will use the information:

5.2.1 to administer its site and apps for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.2.2 to improve its site and apps to ensure that content is presented in the most effective manner for users;

5.2.3 to allow users to participate in interactive features when elected as part of LADY JANE QUILTING (Pty) Ltd's efforts to keep its site safe and secure;

5.2.4 to measure or understand the effectiveness of advertising and present relevant advertisements, and

5.2.5 to make suggestions and recommendations to users of its site about goods or services that may interest them.

5.3 When receiving information from other sources:

5.3.1 LADY JANE QUILTING (Pty) Ltd may combine such information with information received and information collected regarding users. LADY JANE QUILTING (Pty) Ltd may use such information and the combined information for the purposes set out above, depending on the types of information it receives.

5.4 Submission of personal information on behalf of another

5.4.1 Information provided on behalf of someone else, i.e. their child or spouse, should be done with the necessary permission before submitting such information.

5.4.2 On receipt of personal information, LADY JANE QUILTING (Pty) Ltd assumes that the necessary consent has been obtained and will process the personal information as per the users' instructions. Users indemnify LADY JANE QUILTING (Pty) Ltd against any third-party claim where a third-party claims that personal information has been processed without the necessary consent or other available exception under the act.

5.5 LADY JANE QUILTING (Pty) Ltd will only use personal information for other purposes when:

5.5.1 consent is given by users;

5.5.2 it is in the interest of the user, i.e. necessary to lessen or prevent a serious or imminent threat to life, health or safety;

5.5.3 it is required by law or for law enforcement purposes;

5.5.4 where consent for the use and disclosure of personal information is required, LADY JANE QUILTING (Pty) Ltd will seek consent from the data subject directly.

6. Disclosure of information

6.1 LADY JANE QUILTING (Pty) Ltd may share the information with any member of its group, meaning its subsidiaries and ultimate holding company, as defined in the Companies Act, No. 71 of 2008.

LADY JANE QUILTING (Pty) Ltd will not share the information with any third parties, other than the following exceptions:

6.1.1 On the sale or purchase of any business entity or assets, LADY JANE QUILTING (Pty) Ltd may disclose the information to the prospective seller or buyer of such business or assets.

6.1.2 If LADY JANE QUILTING (Pty) Ltd or a substantial portion of its assets are acquired by a third party, the personal information held by LADY JANE QUILTING (Pty) Ltd about our users will be one of the transferred assets.

6.1.3 Compliance with legislation, court order or other legal obligation to enforce or apply its terms of use applicable to any particular site of LADY JANE QUILTING (Pty) Ltd or terms and conditions of supply of LADY JANE QUILTING (Pty) Ltd services to users and other agreements, or to protect LADY JANE QUILTING (Pty) Ltd's rights, property or safety, or the rights, property or safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. Storage of personal information

7.1 The information LADY JANE QUILTING (Pty) Ltd collects from users may be transferred to and stored at a destination outside the Republic of South Africa ('RSA'). It may also be processed by staff operating outside the RSA who work for LADY JANE QUILTING (Pty) Ltd or for one of our suppliers/service providers. Such staff may be engaged in, among other things, the fulfilment of a user's order/our obligations towards a user, the processing of a user's payment details and the provision of support services. By submitting information, users agree to this transfer, storing or processing. LADY JANE QUILTING (Pty) Ltd will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with this privacy policy.

7.2 All information users submit, is stored on LADY JANE QUILTING (Pty) Ltd's secure servers. Hard copies of documents are stored at secure locations. Users are expected to keep passwords given of selected, used to access parts of the LADY JANE QUILTING (Pty) Ltd website.

7.3 Records of information kept, will not be retained longer than necessary for operational or archiving purposes, unless retention of record is required or authorised by law. Records of the information may be retained for periods in excess of those contemplated for historical, statistical

or research purposes, subject to LADY JANE QUILTING (Pty) Ltd establishing appropriate safeguards against the records being used for any other purpose and/or LADY JANE QUILTING (Pty) Ltd has de-identified the record/s.

7.4 Transmission of information via the Internet is not completely secure. LADY JANE QUILTING (Pty) Ltd's endeavours to use appropriate and reasonable technical and organisational measures to protect such information but, cannot guarantee the security of users' data transmitted to its site or to any other location by electronic means. Any transmission is at the users' own risk.

However, once LADY JANE QUILTING (Pty) Ltd has received the information, it will use appropriate and reasonable technical and organisational measures to attempt preventing unauthorised access.

8. Social media platforms

8.1 Communication, engagement and actions taken through external social media platforms in which LADY JANE QUILTING (Pty) Ltd, its directors or employees are custom to the specific terms and conditions as well as the privacy policies held with each social media platform.

8.2 Users must use social media platforms wisely and communicate/engage with them with due care and caution with regard to their own privacy and personal information policies. As LADY JANE QUILTING (Pty) Ltd do not request personal or sensitive information through social media platforms, users wishing to discuss sensitive details or to resolve issues/concerns, should contact LADY JANE QUILTING (Pty) Ltd through primary communication channels such as telephone or email.

8.3 LADY JANE QUILTING (Pty) Ltd social media page/(s), including the social media page(s) those of LADY JANE QUILTING (Pty) Ltd, may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs. Users must take caution and good judgement before clicking any shortened URLs published on social media platforms. LADY JANE QUILTING (Pty) Ltd however, cannot be held liable for any damages or implications caused by visiting any shortened links.

9. Interception and monitoring of communications

9.1 LADY JANE QUILTING (Pty) Ltd, in accordance with relevant legislation, will intercept, monitor, copy or block communications to and from LADY JANE QUILTING (Pty) Ltd's communication facilities, including but not limited to our site, email, SMSs, etc.

10. User rights

10.1 Third-party websites/social media sites

10.1.1 LADY JANE QUILTING (Pty) Ltd does not accept any responsibility or liability should users click on links to partner or advertiser's website from the LADY JANE QUILTING (Pty) Ltd's website.

10.1.2 It is the users' responsibility to check these policies before they submit any personal information to these websites.

10.2 Access to information

10.2.1 Users have a right to see/access the information that LADY JANE QUILTING (Pty) Ltd keeps. Users may request LADY JANE QUILTING (Pty) Ltd to provide them with any personal information it holds about them upon receipt of a written request and payment of a fee as per the Promotion of Access to Information Act, No. 2 of 2000 ('PAIA Act').

10.2.2 Not all information requested may and/or need to be disclosed. Disclosure of information shall take place in accordance with the PAIA Act.

10.2.3 Any request received by user in term of the PAIA Act must be handled by the recipient of the request in conjunction with LADY JANE QUILTING (Pty) Ltd's information officer. Non-compliance by the recipient of the request may put LADY JANE QUILTING (Pty) Ltd at risk and as such the said failure may led to disciplinary action against the recipient.

11. Quality of personal information

11.1. It is the user's responsibility to check the accuracy of the information prior to submission to LADY JANE QUILTING (Pty) Ltd. On receipt of the information LADY JANE QUILTING (Pty) Ltd assumes that users have checked it and that the information is accurate.

12. Changes to our privacy policy

12.1 Any changes LADY JANE QUILTING (Pty) Ltd may make to its privacy policy will be posted on our site and, where appropriate (not obliged), users will be notified by email.

12.2 It is the responsibility of users to ensure that they take cognisance of dates or changes to LADY JANE QUILTING (Pty) Ltd's privacy policy.

13. CONTACT

13.1 Questions, comments and requests regarding the privacy policy can be directed to telene@ladyjanequilting.co.za, for the attention of the IT security officer.

14. AMENDMENTS

14.1. This policy is subject for review within one calendar year of the date of last review, update or amendment.

14.2. This policy may be subject to review, update or amendment within the set calendar year, if the same is required by or in terms of change in legislation, change in external policy guidelines and/or relevant court rulings.

14.3. This policy may only be amended by the department head overseeing the category under which auspices this policy finds application.