

PRIVACY NOTICE OF INKPRO in terms of the *Protection of Personal Information Act 4 of 2013*.

In this document, references to "InkPro" or "we" are to InkPro.

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Introduction:

InkPro is dedicated to protecting the privacy and confidentiality of personal information. InkPro provides a website for our existing as well as prospective clients. People use our website to request more information regarding certain products and services, and to enquire about their existing products and services. Our privacy notice applies to any client/customer of, and / or visitor to InkPro and its services. This privacy notice serves to enable InkPro's customers to understand how InkPro collects, uses and safeguards their personal information.

What is personal information:

Personal Information according to the Protection of Personal Information Act, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b. Information relating to the education or the medical, financial, criminal or employment history of the person;
- c. Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views or preferences of the person;
- f. Correspondence sent by the person that would reveal the contents of the original correspondence;

- g. The views or opinions of another individual about the person; and
- h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Type of information we collect:

In terms of South African legislation, personal information also refers to the personal information that identifies legal entities, such as the trading name of a company combined with the company registration number.

In terms of South African legislation, special personal information refers to Information regarding race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information or any criminal behaviour which relates to alleged criminal offences or proceedings.

We currently collect and process the following information: Contact details (your name, cell phone, email addresses, company name and registration number), ID numbers, physical business address, contact person information (name, surname), banking details of our clients and / our suppliers and service providers.

What information is collected depends on how you elect to interact with InkPro. These interactions include but are not limited to filling in contracts, email correspondence, telephone correspondence, online software communication or making use of any affiliated apps and software. Information includes what clients tell InkPro about themselves, what InkPro learns by having a client or when a client makes use of a specific product or service.

How we collect the personal information and why we have it:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

To maintain working relationship(s) with our Clients / Suppliers;

to finalise work projects;

to process claims;

to liaise when work is pending.

Where and when do we collect personal information:

Information you provide to us:

- Directly from you;
- Based on your use of our products, services;
- Based on how you engage or interact with us, such as on social media, and through e-mails, letters, telephone calls, and surveys;

- Use of our website;
- From third parties affiliated with our services;

Information we collect from others:

Service Use:

We log your visits and use of our services, including mobile applications as applicable. We use logins, cookies, device information and internet protocol (IP) addresses to identify you and log your use.

Cookies, Web Beacons and Other Similar Technologies:

We collect data through cookies and similar technologies. We use cookies and similar technologies to recognise you and / or your device(s) on, off and across different Services and devices. You can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behaviour on the sites of others for third party advertising.

Cookies:

Cookies are small files that are saved onto your computer which track, save and store information about how you use our website and Services. In some instances, these cookies are needed for the website to function – you can disable them in your browser, but this may interfere with the proper functioning of our website.

We use the following cookies:

Session / Period cookies: They allow website owners to collect analytics data, remember language settings, and perform other useful functions that help provide a good user experience. These cookies expire when the browser is closed.

Permanent / Persistent cookies: Same as above, however, these remain in operation, even when you have closed the browser. They remember your login details and password, so you don't have to type them in every time you use the site. These cookies have a pre-determined expiry date and will appear until the expiry date is reached.

Third-party cookies: are created by domains other than the one you are visiting directly, hence the name third-party. These are installed by third parties with the aim of collecting certain information to carry out various research into behaviour, demographics etc, such as advertisers.

Google analytics: This is tracking software from Google which we use to monitor how users interact with the website in order for us to improve its functionality and content.

Web-server software: Web-Server software delivers webpages to your browser. The web-server software will automatically collect your IP address whenever you connect to the website.

Your Device and Location:

We receive data from your devices and networks, including location data as applicable. When you visit or leave our Services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and / or ISP or your mobile carrier. If you use our Services from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other tools to identify your precise location.

Important:

It is in our legitimate interests to service our clients to the best of our abilities.

If you fail to provide personal data when requested, which is necessary for us to consider your request, we may not be able to process your request in order for a InkPro representative to get back to you or for InkPro to render the requested service.

Some of the personal information that is collected automatically is collected by third parties whose technology we use to provide website functionality and acquire website analytics information. Some of these third parties may be outside of the borders of South-Africa and your information may then be stored outside the borders of South Africa. This will be discussed in our Section, Transborder Information.

When will we process your personal information:

We use the information that you have given us to:

Process invoices;

To contact Clients for further instructions;

To make contact regarding business and/or online transactions, and/or;

Further the best interests of the Client – for finalisation of mandate / project.

We will only process your personal information for lawful purposes relating to our business if the following circumstances apply:

- You have consented thereto;
- a Person legally authorised by you, or a court, has consented thereto;
- It is necessary to conclude or perform under a contract we have with you;
- The law requires or permits it;
- It is required to protect or pursue your, our, or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

When will we process your special personal information:

Special personal information refers to the following categories of information:

- Religious and philosophical beliefs;
- Race;
- Ethnic origin;
- Trade union membership;
- Political beliefs;
- Health including physical or mental health, disability and medical history;
- Biometric information;
- Criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

InkPro will process special personal information in the following instances:

- You have consented to processing it (in circumstances where we are legally obliged to obtain your consent); or
- It is necessary to exercise or defend a right or obligation in law; or
- It is necessary to comply with an international legal obligation of public interest; or
- It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
- You have deliberately made your personal information public.

How we use your information:

Services:

We use the data we have about you (e.g. the data you provide, data we collect from your engagement with our services and inferences we make from the data we have about you), to recommend relevant content and conversations on our services or suggest products you may be interested in. We furthermore use your data to render the requested services to you.

Communications:

We will contact you, as well enable communications between yourself and our sales and service department. We will contact you through e-mail, mobile phone, notices posted on our websites or applications and any other ways through our services to you, including text messages and push notification based on your phone settings. We may also send messages about how to use the services, network updates and reminders.

Sensitive and Special Personal Information:

We will only use your sensitive and special personal information in so far as we are permitted by Law to do so.

Marketing:

InkPro will promote our services and products to you. We use data and content about our customers for invitations and communications and network growth, engagement and our services. We may also market other business solutions services offered by us. Communication in this regard will mainly be via telephone and whatsapp but could include, SMS and email. Should you not be a customer of InkPro, we will obtain your consent for any unsolicited electronic marketing communication.

Developing Services and Research:

We develop our Services and conduct research. Services development: We will retain and evaluate information on your recent visits to our website and how you move around different sections of our website so that we can make it more intuitive.

Client Support:

We use your data to help you and respond to queries. We use the data (which can include your communications) to investigate, respond to and resolve complaints and service issues (e.g. bugs).

Aggregate Insights:

We may use data to generate aggregate insights. We use your data to produce and share aggregated insights that do not identify you. For example, we may use your data to generate statistics about our customers, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or demographic workforce insights.

Security and Investigation:

We use data for security, fraud prevention and investigations. We use your data (including communications) if we think it is necessary for security purposes or to investigate possible fraud or other violations of our user agreement or this privacy notice and / or attempts to harm our members or visitors.

Collection:

Enforcing our obligations, including without limitation to the collection of amounts outstanding from you for services rendered by us.

How we share your information:

Related Services:

We share your data across our different service departments. We will share your personal data with our affiliates to provide and develop our services only when necessary.

We may share your information with External Auditors and Book Keeper(s), as and when required, as well as SARS (only when essential). All personal information is only shared with trustworthy third parties after obtaining the consent of the applicable Data Subject(s).

Third Party Service Providers:

We may make use of third party service providers to assist us with our services. They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes. Where required, we may share a customer's personal information with the following persons, which may include parties that we engage with as independent responsible parties, joint responsible parties or operators.

- Information technology, photocopiers;
- Employers organisations;
- Government institutions;
- Training providers;
- Training authorities;
- Financial administrators;
- Software/App developers;
- Verification agencies
- Courier Service (if required by you)
- Supplier/Warranty Centre or Manufacturer of the products purchased from us in order to facilitate returns/repairs of defective products and only where it is a strict requirement for such return or repair or in the event that you have requested very specialised help regarding the product you have purchased from us to try and resolve your query.

Legal Disclosures:

We may need to share your information when we believe it is required by law, legal process or to help protect the rights and safety of you, us or others. We attempt to notify customers about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand.

How we store your personal information:

Your information is securely stored on our company server at the workplace. The information is backed up on our company hard drive. There is restricted access to such information. We only keep your information for the absolute minimum period of time necessary, according to prevailing legislation and the prescribed retention period (this will depend on the type of information).

Your rights and obligations:

Data Retention:

We keep most of your personal information while you still have a profile with us and we need to provide you with services or where we are legally obligated to do so.

We will process your information while your profile is still active with us and you keep on making use of our services. This includes any information you have provided to us or we have collected from third parties as set out in this privacy notice.

Even if you are not constantly making use of our services, platforms, software and apps, we will retain your information and keep your profile open until you decide to stop making use of our services.

We will also keep your information where you have agreed for us to do so, or have given your consent that we are allowed to do so.

In some instances, we may choose to retain certain information about you after you have closed your profile, but we will do that in a depersonalised form for statistical, historical or research purposes.

We keep some of your information even after you have closed your profile or stopped making use of our services, if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information.

Rights to access and control your personal information:

You have rights in connection with your personal information. You have many choices about how your information is collected, used and shared.

In certain circumstances, by law, you have the right to:

- **Request access to your information:** You will be able to ask us what information we have about you as well as ask for a copy of this information. This should be done on request to admin@inkpro.co.za. There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy it might be done at a certain fee, which will also be communicated to you at the time of your query.
- **Change or correct information:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Delete information:** You can ask us to delete or remove personal information under certain circumstance.
- **Object to processing:** You can do this where we are relying on your legitimate interest, public interest or our legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes or where you have given your consent for the specific processing and you want to retract you consent. Retracting your consent does not invalidate your information we lawfully processed while we had your consent to do so.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Where you want to review, verify or correct your personal information, you can do so by sending us an email with your request. If you want to object to the processing of your personal information or retract your consent, please send an email, with the completed Form 2 Annexed hereto, to admin@inkpro.co.za

Changes to our privacy notice:

Changes to the privacy notice apply to your use of our services. InkPro can modify this privacy notice. When material changes are made, we will provide notice through our services, or by other means, to provide you the opportunity to review the changes before they become effective.

You acknowledge that your continued use of our services, after we publish our changes to this privacy notice, means that the collection, use and sharing of your personal information is subject to the updated privacy notice.

Other important information:

Security:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our specific instructions, and they are subject to a duty of confidentiality.

Transborder information transfers:

InkPro does not transfer personal information to any region outside of the Republic of South Africa.

However, should it become necessary to transfer personal information to another country for any lawful purposes, we will ensure that anyone to whom it pass personal information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection and the third party agrees to treat that personal information with the same level of protection as we are obliged under POPIA.”

Some of the personal information that is collected automatically is collected by third parties whose technology we may use to provide website functionality and acquire website analytics information. Some of these third parties will be outside of the borders of South-Africa and your information will then be stored outside the borders of South Africa. Where we make use of Google Analytics and the information collected through this third party, the information will be kept on the servers used by Google. More information regarding Google’s Privacy Policy and their updates can be found on the internet.

Contact Information:

Queries regarding **Access to and Correction/Updates of your Personal Information** may be emailed to InkPro's information officer via email.

If you have any concerns about our use of your personal information, you can make a complaint to us in writing.

All queries or complaints shall be directed to the Information Officer.

InkPro's Information Officer:

J. Koornhof van Rooyen.

Email:**admin@inkpro.co.za**

You have the right to lodge a complaint with the SA Information Regulator if you are unhappy with how we have used your data. See the Information Regulator contact details below.

The SA Information Regulator:

infoereg@justice.gov.za

Website <https://www.justice.gov.za/infoereg/>.

Tel.010 023 5200

Annexures:

PRIVACY NOTICE FORM 1:

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

PRIVACY NOTICE FORM 2:

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]