



Privacy Policy





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About this Privacy Policy

This Policy sets out what the categories of personal information Ithaca Technologies (The Company, We, Us), may collect from you when you visit the website and its associated applications, as well as how we process that personal information. This Policy must be read in conjunction with our PAIA manual and cookie policy.

If you have any questions about this Policy, please see contact details at the end of this page. We may amend this Policy from time to time, so you should check this page from time to time to ensure that you are aware of any changes that have been made. If we make material changes to this Policy, we will notify you by means of a prominent notice on the website prior to the change becoming effective.

Background

Ithaca Technologies is a company operating in the Republic of South Africa and providing technology solutions and services to clients within and outside of South Africa.

In the course of its business operations, the Company collects, uses, stores, and otherwise processes personal information of various Data Subjects, including clients, website visitors, employees, and other individuals.

The Company is committed to protecting the privacy and personal information of all Data Subjects and recognizes the fundamental right to privacy as enshrined in the Constitution of the Republic of South Africa.

The Company operates as an operator in terms of the **Protection of Personal Information Act, 2013 ("POPIA")** and is obligated to comply with all applicable data protection laws and regulations in South Africa.

This Privacy Policy sets out the Company's practices regarding the collection, use, disclosure, storage, and protection of personal information, and describes the rights of Data Subjects in relation to their personal information.

The Company is committed to processing personal information lawfully, fairly, transparently, and to implement appropriate technical and organizational measures to ensure the security and confidentiality of personal information.

This Privacy Policy serves to inform Data Subjects of their rights under POPIA and provides clear procedures for exercising those rights.



Information We Collect from You

Personal information you volunteer

Any cookie information that we collect is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the website and, pages viewed. We use this information to measure the use of our website and to improve its contents.

We may collect the following information:

- Your name and contact information, including email address and company details which you may submit to us when you interact with the Website; and
- Any information that is subject to a contract or service agreement concluded between us.

If you do not provide the information we need, we may not be able to provide our services to you. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us. We will process their personal information in accordance with this Policy and our Data Protection Statement.

Personal information we collect automatically

When you use the Website, we automatically receive and record information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. We treat this data as non-personal information, except where we are compelled to do otherwise by law or legal authority.

We only use this data in an aggregate form and we may provide this aggregate information to our partners about how our customers, collectively, use the website, so that our partners may also understand how users make use of the website.

Cookies

As we mentioned above, we use cookies on our website. Cookies are files that store information on your hard drive or browser allowing our website to recognise that you have visited it before. All information regarding cookies, and how we use them to enhance your experience on our website can be found within our Cookie Policy.



What we do with the information

We use your information to provide you with a better service, and for the following reasons:

- To provide you with services you have requested and to notify you about important changes or developments to these services;
- To respond to your inquiries and/or complaints or process your requests in relation to your information;
- To follow up as part of our customer care procedures;
- To update our records about you;
- For internal record keeping;
- To contact you for market research purposes and/or administer offers to you;
- To improve our products and services;
- For fraud prevention and detection, and to comply with applicable laws and regulations;
- In relation to competitions and other promotions;
- To evaluate the effectiveness of our marketing and for research, training, and statistical analysis with the aim of improving our services; and
- To make our website easier for you to use and to provide you with access to certain parts of the Website.

ODIN

ODIN is the platform our clients use. The information we collect and process is subject to the terms and conditions of ODIN, and to the contract entered into to use the system.

ODIN collects the following data from its users:

- Client organisation data
- Client business asset data including employee information
- Clinical report forms and the information contained in them
- Usage data

The Data collected by ODIN is used by the clients to conduct their business and to ensure regulatory compliance. We may use the data to provide analytics and statistical insights to them to support their business functions.

The data that is used by us is to provide analytics, is anonymised and de-identified first.



We process your personal information for the purposes outlined above where:

We process Personal Information only where it has a lawful basis to do so in accordance with POPIA and other applicable laws.

The Company relies on the following lawful bases for Processing Personal Information:

- **Consent:** Where the Data Subject has given specific, voluntary, and informed Consent for the Processing of their Personal Information for one or more specific purposes.
- **Contractual necessity:** Where Processing is necessary for the performance of a contract to which the Data Subject is a party, or to take steps at the request of the Data Subject prior to entering a contract.
- **Legal compliance:** Where Processing is necessary for compliance with a legal obligation to which the Company is subject under South African law.
- **Legitimate interests:** Where Processing is necessary for the purposes of legitimate interests pursued by the Company or a Third Party, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject.
- **Vital interests:** Where Processing is necessary to protect the vital interests of the Data Subject.
- **Public interest:** Where Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

The Company's legitimate interests include:

- Operating and improving the Company's business operations and Services;
- Ensuring network and information security;
- Preventing fraud and criminal activity;
- Direct Marketing to existing clients and customers;
- Managing supplier and business partner relationships.



No Sale of Personal Information

The Company does not sell, rent, or otherwise commercially exploit Personal Information to Third Parties for monetary consideration.

Data Breach

The Company has established procedures to detect, investigate, assess, and respond to any actual or suspected Data Breach affecting Personal Information under its control.

Upon becoming aware of a Data Breach, the Company will immediately:

1. Contain and secure the affected systems to prevent further unauthorized access or disclosure;
2. Assess the scope, nature, and potential impact of the Data Breach;
3. Document all relevant details of the incident including the nature of the breach, categories of Personal Information involved, number of Data Subjects affected, and potential consequences.

The Company will notify the Information Regulator and our clients of any Data Breach that poses a risk of harm to Data Subjects within seventy-two (72) hours of becoming aware of the breach, unless the Company can demonstrate that the Data Breach is unlikely to result in harm to the Data Subject.

The notification to the Information Regulator will include:

1. A description of the nature of the Data Breach;
2. The categories and approximate number of Data Subjects concerned;
3. The categories and approximate number of Personal Information records concerned;
4. The likely consequences of the Data Breach;
5. Measures taken or proposed to address the Data Breach and mitigate its adverse effects.
6. Where the Data Breach is likely to result in a high risk of harm to Data Subjects, the Company will communicate the breach to affected Data Subjects without undue delay, unless:



7. The Company has implemented appropriate technical and organizational protection measures that render the Personal Information unintelligible to unauthorized persons;
8. The Company has taken subsequent measures to ensure the high risk of harm is unlikely to materialize;
9. Communication would involve disproportionate effort, in which case the Company will make a public communication or similar measure.
10. Communications to affected Data Subjects will be in clear and plain language and include:
 - a. The nature of the Data Breach;
 - b. Contact details of the Information Officer for further information;
 - c. Likely consequences of the Data Breach;
 - d. Measures taken or proposed to address the breach and mitigate adverse effects;
 - e. Recommendations for Data Subjects to protect themselves from potential harm.

The Company will maintain comprehensive records of all Data Breaches, including facts relating to the breach, its effects, and remedial action taken, for a minimum period of five (5) years.

Following any Data Breach, the Company will conduct a thorough review of its security measures and procedures to identify improvements and prevent similar incidents from occurring.

The Company may engage external cybersecurity experts, legal counsel, or other Third Parties as necessary to assist with Data Breach response, investigation, and remediation efforts.

Your Right to Object

Where required by applicable law, where we send you direct marketing, we will obtain your consent for this, which you may withdraw at any time.

You may object to the processing of your personal information where that processing is carried out for our legitimate interests.



How Long do we Keep Your Information

We are required to ensure that your personal information is accurate and maintained in a secure environment for a period no longer than necessary for the purposes for which we are processing your personal information. We generally keep personal information collected via the website in accordance with the timeframes set out in any relevant legislation which applies to the personal information provided to us. However, in some cases we may need to keep personal information for longer (e.g., where we are required to do so in accordance with legal, regulatory, or dealing with complaints, legal challenges, or prospective litigation). You may ask us at any time if we have information on you and how long we plan to keep it, or to request deletion thereof.

If we have entered into a contract with you we will keep the information for as long as we have a valid contract, subject to any laws or regulations that may require us to keep it for longer periods.

Sharing Your Information

We may disclose your personal information to the following third parties:

- Selected third parties to provide us with services, including companies that provide hosting services or, that track the website's activities and analytics, and companies engaged to market and distribute our products and/or services;
- Professional advisers, judicial, regulatory and law enforcement bodies; and
- Third parties that acquire all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise. If this happens we will notify you by way of a banner placed on our website.

Accessing your information

You may request details of personal information which we hold about you under the **Promotion of Access to Information Act**, 2 of 2000. Fees to obtain a copy or a description of personal information held about you are prescribed in terms of this Act. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by us, please review our Promotion of Access to Information Act Manual located at www.ithaca.co.za



Contact us:

The Company has designated an **Information Officer** in accordance with POPIA who is responsible for ensuring compliance with data protection obligations and handling privacy-related inquiries. If you have any questions about our Policy or practices described in it, you should contact us as follows:

- 1.1. Data Subjects may contact the Company regarding any privacy-related matters, including exercising their rights under this Privacy Policy or POPIA, by using the following contact details:
 - (a) **Information Officer:** Niel Sadie
 - (b) **Email Address:** info@lthaca.co.za
 - (c) **Registered Address:** 485 on Dawn Street, Lynnwood, Pretoria
- 1.2. Data Subjects may direct specific inquiries as follows:
 - (a) **General privacy questions:** Use the general contact details as set out above.
 - (b) **Data Subject access requests:** Submit written requests to the Information Officer using the contact details above



Complaints:

Any complaint can be made by contacting the Information Officer by using the methods above.

If we cannot resolve your complaint or you are unsatisfied by our handling of your complaint, you have the right to complain to the Information Regulator of South Africa.

Complaints must be made in the prescribed manner and form to the Regulator, the manner in which shall be available on their website.

Complaints to the Information Regulator may be lodged at any time, whether or not you have first complained to the Company. We would ask that in the unfortunate event that you have a complaint, you direct it to us first so that we may remedy the situation before contacting the Regulator.

The **Information Regulator** may be contacted at:

- Physical Address: Woodmead North Office Park, 54 Maxwell Dr, Woodmead, Sandton, 2191
- Phone number: 010 023 5200
- Toll Free number: 0800 017 160
- Email: enquiries@inforegulator.org.za for general enquiries
- POPIAcomplaints@inforegulator.org.za for POPIA related complaints
- PAIAcomplaints@inforegulator.org.za for PAIA related complaints
- Website: www.inforegulator.org.za