

SNG Consulting Privacy Notice v1.1

SNG INVESTMENTS and its affiliates (“SNG Consulting,” “we,” or “us”) is committed to protecting your information.

This Notice explains how we collect and use information that you provide via our websites or when you register for our events or apply to participate in a trial, or in the normal course of business when you ask us to perform a service on your behalf, or supply you with a product.

Please read the following carefully before you give us any information.

If you have any questions about our privacy practices or questions, requests or concerns regarding your information, please contact us via email to enquiries@sngc.co.za

Email Disclaimer

This email contains confidential information for the use of the intended recipient only, and interception thereof is illegal. If you are not the intended recipient, you may not disclose, copy, distribute and/or otherwise disseminate the contents of this email, or place any reliance thereon, or take any action pursuant thereto. Should you have received this email in error, please notify us immediately by return email and destroy any copies thereof in your possession. The views and opinions expressed herein are those of the sender and do not necessarily represent SNG Investments CC or any of its subsidiaries or affiliates’ (“the Companies”) authorized views and opinions, nor do they constitute any obligation on the Companies unless otherwise stated or agreed to in writing. The Companies do not warrant that the integrity of this communication has been maintained, or that it is free of errors, viruses, interception, tampering or interference. The Companies do not accept liability or legal responsibility of any nature whatsoever in relation to this electronic message.

Information we collect

We collect information about you or the devices you use from the following sources:

- When you view our website;
- When you provide information to us when requesting information from us;
- When you purchase a product from us or register your ownership of a product with us;
- When you download an evaluation product from us;
- When you are establishing or maintaining an account or otherwise receiving a service from us;
- When you register to attend or while attending a SNG Consulting event (Please note that at our training courses, events presentations, panel discussions and other activities can be recorded);
- When you register to participate in a voluntary trial organised by SNG Consulting.

This information may be collected when you are filling in forms on our website, giving us your business card, entering a survey, competition or promotion organised by us, or when generally corresponding with us by phone, email, letter or otherwise.

In addition, we collect information about you:

- When we share information within the SNG Consulting corporate family in the ordinary course of business;
- When we receive referrals from customers and others;
- When we collect or receive data from third parties, including, in some cases, publicly available directories, as part of our marketing and prospecting activities.
- We may also receive information about you from third parties when we are acting for a client and we are required to obtain information about you for example because you are a witness in a litigation case and we are instructed as an expert witness.
- We may also collect contacts detail, insurance and vehicle details in the event a SNG Consulting vehicle is involved in an incident.
- We may also receive CCTV footage for the purposes of research into accident prevention and for the improvement of transport safety.

Types of Information

From the sources listed above, we collect the following types of information:

- Name, business or personal email address, phone number, physical address;
- Job title and professional details;
- Background information required to apply for a job;
- Profile photograph;
- LinkedIn profile data;
- Billing details;
- Information relevant to event attendance, such as meal preferences or information submitted via our websites or other channels;
- Titles of articles, publications and reports downloaded from our website;
- Types of products and services supplied by us to you in fulfilment of a contract between us
- SNG Consulting vehicle dashcams may record your image for safety research and prevention of crime purposes

Information collected automatically

When you use our websites, we may collect information about you (such as the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform).

‘Special category’ data

During the course of providing our services, we may collect personal information about you (or a person you are representing) relating to age, gender, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, or certain types of genetic or biometric data (such information is known as ‘special category’ data). This is most likely to occur, for example, if you are voluntarily participating in a trial, or the information is necessary in order for us to perform services that you or your agent have requested from us. (Please note that the result of all trial data is anonymised).

We will only collect, store or use ‘special category’ data if;

- We have your explicit consent;
- We believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent, or
- You have previously made that data public knowledge, or
- It is necessary to protect your vital interests, or the vital interests of another person, or
- We need to use that data to establish, exercise or defend legal claims.

When we collect or receive special category data, we will seek your explicit consent to do so.

Use of cookies

Our websites use cookies and other tracking technologies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies and local storage objects, over which we have no control. These cookies and local storage objects are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites.

All cookies will expire after a defined period of time up to a maximum of two years.

The information automatically collected by cookies and other tracking technologies may be associated with any personal data you have provided.

How we use information we collect

We use, share and disclose your information as follows:

1. Necessary for the performance of a contract and to comply with our legal obligations

- To perform a service on behalf of a client who gives us the data;
- To confirm your identity;
- To process payments.

2. For our legitimate interests in conducting our business, such as:

- To fulfil your requests;
- To deliver a contract with your or your agent;
- To respond to your questions, concerns, or customer service inquiries;
- To otherwise communicate with you about your account or project;
- To conduct customer satisfaction surveys;
- To carry out certain marketing activities such as an invitation to renew a product licence or ask about improvements to products or services we provide;
- To conduct research and analysis, including surveys;
- To enforce the legal terms that govern our websites and online services;
- To create aggregated or anonymized data, which we may use and disclose without restriction;
- To ensure you receive the best experience possible when accessing and using our website;
- To make suggestions and recommendations to you and other users of our sites about goods or services that interests you or them;
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

3. On the basis of consent, such as:

- To send you information, including marketing communications;
- To personalise the content, you see on our websites, across the Internet, and elsewhere;
- To distribute newsletters, reports, publications and alerts to you;
- To publish or share the attendee lists for our events;
- To provide relevant information (for hospitality and safety purposes) to hotels and other facilities involving in hosting the event attendees;
- To participate in a trial;

- To process a job application (a separate Candidate Privacy Notice may also apply).

For any of the purposes above, we share information with other members of our corporate family. We also share your information with third-party service providers that perform services on our behalf.

We will disclose your personal information to third parties:

- In the event that we enter into negotiations to sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If SNG Consulting or substantially all of its assets are acquired by a third party, in which case personal data held by it about our clients will be one of the transferred assets; or
- If we are under a duty to disclose or share your personal data in order to comply with any auditing, and corporate governance functions or legal obligation, or in order to enforce or apply any contract between you or us, or our website terms of use, or to protect the rights, property, or safety of SNG Consulting, our clients, or others.

Some features of our websites, and online services allow you to make data public or engage in other sharing. For example, registration on some of our websites will create a public profile (or a profile visible to other registered users), which includes information drawn from social networking accounts that you associate with the profile, such as name, photo and biography, as well as other information that you add.

If you post content or otherwise participate in discussion forums or other social areas of our websites, your participation (including the content you post, your name, and a link to your profile) may be shared across our websites and in other public or private areas of the internet.

Our websites do not collect personal data about your online activities over time and across third party websites or online services. Therefore, “do not track” signals transmitted from web browsers do not apply to our websites, and we do not alter any of our data collection and use practices upon receipt of such a signal.

Social networking

Our websites may allow you to sign into and associate your social network accounts including, but not limited to, Twitter, LinkedIn, Facebook, and YouTube, with SNG Consulting. By associating your social network account with SNG Consulting or logging in to a SNG Consulting account using your social network account credentials, you give us permission to access information that you have made available in your public profile for that social network account. The information available in your public profile varies based on the social network and your settings, but may include your email address, real name, profile picture, gender, and location. We use the information we receive from your social network account in accordance with the social network's terms of use and this Privacy Notice. Please refer to the privacy settings in your social network account for information about what data is shared with SNG Consulting and other connected applications and to manage the data that is shared through your account, including information about your activities using our websites.

If you would like to disconnect a social media account from us, refer to the settings of that social network account and its provider.

How we keep your information secure

We have implemented administrative, technical, and physical security measures to help prevent unauthorised access to your information. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via our websites; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We make efforts to restrict access to information to only those employees, contractors, and agents who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

Please note that you are responsible for maintaining the secrecy of your credentials used to access any account or service with SNG Consulting, and you must report suspected unauthorized activity to us. You are responsible for activity conducted with your credentials.

Some third parties' embedded plugins or other automated technology on our websites, such as cookies or social sharing buttons, allow their operators to learn that you have visited or interacted with our websites, and they combine this information with other, identifiable information they have collected about your visits to other websites or online services. These third parties handle this information, and other information they directly collect through their content and plugins, pursuant to their own privacy notices.

How long we store your data

We generally retain information for so long as it is relevant to the purposes above:

- We will use/store your data for as long as it is necessary for the performance of the contract between you and us;
- We will use/store your data for as long as it is necessary for us to comply with our legal obligations;
- When it is necessary for our legitimate business interests we will use/store your data until you ask us to stop or there is no longer a legitimate reason to hold the data. However, if we can demonstrate that the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, when we no longer have a legitimate interest in using/storing your data);
- When you have given us your specific, informed and unambiguous consent we will use/store your data until you ask us to stop.

We may retain your information in copies made for backup and business continuity purposes for additional time.

Automated decision-making

We do not use automated decision-making processes.

Marketing communications

We will respect your wishes not to receive marketing communications. You can change your marketing preferences by contacting us at the email or addresses the top of this Notice. If you gave us your email address to receive marketing communications, you can opt out at any time by using the unsubscribe links or instructions included at the bottom of our emails. Please note that we will continue to send you service-related communications regardless of any opt-out request. We will not sell or share your information or information with third parties for their own promotional or marketing purposes unless you give us consent to do so and where permitted by applicable law.

Access to your information (Data Subject Rights)

You have the following rights regarding your personal data:

Rights	What does this mean?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this Privacy Notice.
2. Right of access	You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we are using your personal data in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal data corrected if it is inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. Right to restrict processing	You have the right to 'block' or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing	You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including in each case any related profiling).
8. Right to withdraw consent to processing	If you have given your consent to us to process your personal data for a particular purpose (for example, direct marketing), you have the right to withdraw your consent at any time (although if you do so, it does not mean that any processing of your personal data up to that point is unlawful).
9. Right to make a complaint to the data protection authorities	You have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal data or believe our processing of your personal data does not comply with data protection law.

In situations where we process your information on behalf of our clients, we may refer the request to the relevant client and cooperate with their handling of the request, subject to any special contractual arrangement with that client.

In some cases, you may directly access your online profiles and other personal details and amend, update, add, or delete information yourself by logging into the relevant portions of our websites.

We may require you to prove your identity with approved identification before fulfilling your request.

Other Websites

To provide increased value to you, we provide links to other websites or resources that are not part of the products, programs, or services run by SNG Consulting. We do not control these websites or their privacy practices, and any information you provide to these sites is subject to the Privacy Notices of those sites and not this Notice.

Children

Our websites deliver business-related content and are specifically aimed at and designed for use by adults. We do not knowingly solicit or collect information from or about individuals under the age of 18 years.

Changes to our Notice

Any changes we make to our Notice in the future will be posted on our website and, where appropriate, notified to you by post, email or via social media. Please check our website frequently to see any updates or changes to our Notice.

Contact

Questions, comments and requests regarding this Notice are welcomed and should be addressed to our Data Protection Officer, by writing to the address at the top of this Notice, or by emailing us at enquiries@sngc.co.za.