

## WEBSITE INFORMATION PRIVACY STATEMENT (“WIPS”)

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Wineland Debt Counsellor Contact person: (“POPIA” automatic Information Officer appointment.)

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### **LEGAL REFERENCES:**

Protection of Personal Information Act 4 of 2013 (“POPIA”)

The General Data Protection Regulations (“GDPR”)

California Consumer Privacy Act of 2018 (“CCPA”)

### **DEFINITIONS:**

#### **“personal information”**

Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- Financial, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the person.

- Information relating to the race, gender, sex, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, language.

**“data subject”** means the person to whom personal information relates.

### **PURPOSE FOR COLLECTION.**

This policy stipulates how we obtain, process, and store your personal information, in accordance with the requirements of “POPIA”. We will maintain all documentation of all processing operations under its responsibility as referred to in section 14 or 51 of the Promotion of Access to Information Act.

We do not collect home, business or e-mail addresses, or account information from persons who simply browse our Internet website.

We use any service information and optional information provided by you for the following:

- store your information so that you will not have to re-enter it during your visit or the next time you access our [website](#).
- monitor your website activity such as total number of visitors and pages accessed.
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of our [website](#).
- With prior and explicit consent deliver targeted advertising, newsletters, and other information regarding promotions to you.
- Monitor, and analyze usage and trends to make future visits to our site more personalized.
- Notify you of updates to our [website](#).
- Request feedback and contact you about your use of our site/services.

**Section 9 of POPIA states that “Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.”**

The only identifiable information we obtain will be information provided by a prospective client requesting information from us regarding our products and services offered via online application and our purpose for collecting and processing information is therefore mainly for the purposes of understanding your requirements, and delivering services accordingly or as and how your employ us to do so under the following headings:

### **DIRECT MARKETING:**

In line with "POPIA" we process your personal information regarding direct marketing (email, SMS's, WhatsApp), when you furnish us with explicit consent or you are our customer and where the user has been given a reasonable opportunity to object, free of charge and in a manner free of unnecessary formality, to such use of your details:

- at the time when the information was collected; and
- on each communication for the purpose of marketing if you have not initially refused such use.

Any communication for the purpose of direct marketing will contain:

- details of the identity of the sender or the person on whose behalf the communication has been sent; and
- an address or other contact details to which the recipient may send a request that such communications cease. Opt-out choice.

### **OPT-OUT OF EMAIL MARKETING:**

You can opt-out / unsubscribe from our marketing email list at any time by clicking on the unsubscribe/ Opt-Out link in the emails that we send or by contacting us using the details provided [here](#).

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

### **FINANCIAL INFORMATION:**

No financial information is collected.

### **OTHER WEBSITES VISITED**

We automatically receive and keep Internet activity information on our third-party hosting company's server from your browser, e.g., internet protocol address ("IP Address"), browsing habits, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement.

### **INFORMATION FROM SOCIAL NETWORKS**

Personal information collected from social networking websites, such as Facebook, Instagram, Pinterest, Twitter, that include your name, username, location, gender, birth date, email address, profile picture, and contacts, if you connect your account to such social networks

### **FACEBOOK PERMISSIONS**

We, by default access your [Facebook](#) basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. For more information regarding Facebook permissions, refer to the [Facebook Permissions Reference](#) page.

### **MOBILE DEVICE INFORMATION**

Your device's information, e.g., device ID, model, and manufacturing information and device location if you access the Site from a mobile device.

### **ONLINE POSTINGS**

When you post comments, contributions, or other content to public Sites your posts can be viewed by all users and can be publicly distributed outside the Site in its entirety.

### **COOKIE DECLARATION:**

As our [website](#) user/ customer, you can determine how you want to use cookies on our [website](#). You can find our official cookie policy [here](#), where you can also withdraw or change any consent given or alternatively contact us via the contact details supplied [here](#).

### **INFORMATION FROM MINORS:**

We understand the importance of the safekeeping of our children – Under 15 and young people's (Aged between 15 – 18) personal information. We will implement extra processes and protections to keep our children and young people's information safe: We do not knowingly conduct business or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate any account created when we allow the creation of accounts and take reasonable measures to promptly delete such information from our records. If you become aware of any information, we have collected from children under age 18, please contact us [here](#). This Privacy Policy is in accordance with applicable global privacy laws, such as the U.S. Children's Online Privacy Protection Act (also known as COPPA).

### **KEEPING YOUR INFORMATION SAFE:**

Even while striving to do our utmost best, we cannot guarantee that the internet itself is 100% secure and transmission of personal information to and from our [website](#) is at your own risk. We aim to protect your personal information through a system of organizational and technical security measures.

- Physical security of the premises
- Password protection – intermediate renewal.
- Anti-virus programs – Kaspersky

### **STORING OF PERSONAL INFORMATION:**

Where will all your personal information be stored:

- On-site server
- USB memory sticks
- Hard drives
- Filing cabinet in the manager's office

While through using our [website](#), we do not collect identifiable information rather “traffic” counted we will only store your information gathered for the purpose it has been gathered for and no longer than 5 years after the termination of the business transaction by destroying all relevant personal information or anonymizing it where destruction is not possible, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

### **INFORMATION DISCLOSURE:**

Legally required:

We will disclose personal information if required:

- By court order.
- to comply with any law.
- to protect the safety of any individual or the public.
- to prevent violation of our terms of service.
- If you contact us regarding your experience with using any of our products and/or services, we will disclose your personal information as required of by law or governmental audit.

### **TO SELL PERSONAL INFORMATION**

We will never sell your personal information and/or any part of it. No personal information will be disclosed to anyone except as provided in this privacy of person information policy. Non-disclosure.

### **Cross Border transfers of personal information**

Where applicable we do not transfer and/or store personal information outside South Africa, to any country that does not have adequate data protection laws, UNLESS with prior and explicit and written consent.

### **PERSONAL DATA BREACH NOTIFICATION**

"Security breach" means a breach leading to the accidental or unlawful/unauthorised ruin, loss, modification, disclosure of, or access to, personal information transmitted, stored, or otherwise processed in connection with the provision of our services.

If there has been a security breach of your personal information, we will notify you and The Information Regulator within 48 hours by e-mail together with the following:

- the extent of the breach,
- affected information,
- our action plan for measures to secure the information and limit any possible negative effects.

### **YOUR RIGHTS:**

- **The right to know: You can request, free of charge, that we disclose whether we are holding or are in possession of any information relating to you. Fees may be incurred.**
- **The right** to request, where necessary, the correction, destruction, or deletion of your or any part of your personal information as provided.
- **The right** to object to and/or restrict, on reasonable grounds relating to your situation to the processing or further processing of your personal information.
- **The right** to withdraw consent as easily as it was given.
  - at any time for purposes of [direct marketing](#) as well.
- **The right** to request the record or a description of the personal information held by the responsible party, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information of the data subject.

- within a reasonable time.
- **at a prescribed fee.**
- in a reasonable manner and format; and
- in a form that is generally understandable.

#### **CALIFORNIA CONSUMER RIGHTS:**

The California Consumer Privacy Act is a state statute intended to enhance privacy rights and consumer protection for residents of California, United States. CCPA, permits our users who are California residents to request, once a year and free of charge, information about personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediate prior calendar year. Submit your request in writing to us [here](#).

If you think that the way we process your personal information does not comply with applicable data protection laws, you can contact the relevant competent data protection authority. You can obtain the information for contacting the Californian information protection authorities [here](#).

#### **GENERAL DATA PROTECTION REGULATION:**

The General Data Protection Regulation 2016/679 is a regulation in EU law on data protection and privacy in the European Union and the European Economic Area. It also addresses the transfer of personal data outside the EU and EEA areas. GDPR provide detailed instructions on how to create a privacy notice, placing an emphasis on making them easy to understand and accessible.

It is a GDPR requirement that it is clear and concise which information is being collected from our visitors/customers – “data subjects”, how it is being utilised and the purpose for which it is being collected and how it is processed and by whom. We process your information for lawful reasons where: (a) you have given consent; (b) processing is necessary for the performance of a purchase and/or request; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party and your interests and fundamental rights and freedoms do not override those interests. We hope that if you have any questions for us regarding our data collection, you will write us [here](#).

The GDPR also requires us to take appropriate technical and organizational measures to protect the security of information relating to EU residents. Your information is stored on private servers belonging to us and/or third parties. We make commercially reasonable efforts to ensure the privacy and security of the data of our European visitors and customers.

If you think that the way we process your personal information does not comply with applicable data protection laws, you can contact the relevant competent data protection authority. You can obtain the information for contacting EU data protection authorities [here](#).

#### **CONSEQUENCES OF WITHHOLDING CONSENT:**

Should you refuse to provide us with your relevant/required personal Information, along with the required consent to process the Personal Information, then we would be unable to provide our service to you and / or enter any subsequent relationship with you.

#### **POLICY MAINTENANCE:**

We reserve the right to make changes to this Privacy Policy at any time and for any reason without informing the user. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site - “[Last Updated](#)” date of this Policy. Implementing the change on the [website](#) is sufficient.

#### **THE INFORMATION REGULATOR, ACT AND REGULATIONS HYPERLINKS:**

- Information Regulator [here](#).
- POPI Act [here](#).
- POPIA Regulations [here](#).

#### **COMPLAINTS**

Please feel free to contact us using the details provided [here](#), with any concern, complaint and/or feedback. Any complaints will be in confidence. Should you feel disgruntled in our acts or omissions in handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator [here](#).

#### **DOCUMENT SECTION:**

**Object Processing of Personal Information:** [Form 1](#) - Objection Processing of Personal Information - [here](#).

**Updating personal information:** [Form 2](#) - Request for Correction or Deletion of Personal Information - [here](#).