

A black and white photograph of a business meeting. In the foreground, a person's hand is holding a white business card, which is being offered to another person whose hand is visible. The background shows other people seated at a table, slightly out of focus. A large red diagonal shape cuts across the bottom right of the page.

Data Protection & Privacy Policy

February 2022

Data Protection and Privacy policy

Definitions

In this policy (as defined below), unless the context requires otherwise, the following terms will have the meanings given to them:

- **Applicable laws**

Any laws applicable to personal data and personal information, including any statute, regulation, notice, policy, directive, ruling or subordinate legislation, the common law, any binding court order, judgment or ruling, any applicable industry code, policy or standard enforceable by law, or any applicable direction, policy or order that's given by any regulator, competent authority or organ of state or statutory industry body.

- **Child**

Any natural person under the age of 18 years.

- **Client**

Any natural person (or, where applicable) juristic person, who has concluded an agreement with Introduxion.

- **Competent person**

Anyone who is legally competent to consent to any action or decision being taken by any matter concerning a juristic person or child, for example a director, parent or legal guardian.

- **Controller**

Introduxion, in circumstances where it processes personal data, as defined in Article 4 of the GDPR.

- **Data subject**

Introduxion's clients, potential clients or any third party in respect of whom Introduxion processes personal information/personal data.

- **GDPR**

The General Data Protection Regulation, which is a European law that governs all collection and processing of personal data from individuals inside the European Union.

- **Operator**

A person or entity who processes personal information/data for a responsible party.

- **Personal data (as defined in Article 4 of the GDPR)**

Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly.

- **Personal information**

Will have the same meaning as is given in Section 1 of POPIA.

- **Policy**

This data protection and privacy policy.

- **POPIA**

The Protection of Personal Information Act No. 4 of 2013.

- **Processing**

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information/personal data, including:

- Its collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use.
- Dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means.
- Merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, 'process' has a corresponding meaning.

- **Regulator/s**

Any applicable regulatory authority, including the Information Regulator established in terms of POPIA.

- **Responsible party**

In the context of this policy, Freeworld Internet Access CC trading as Introdution.

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Corner of Atlas Road and Park Road

Parkhaven, Gauteng, 1459

Freeworld internet Access CC trading as Introdution

Reg no. 2006/048616/23

VAT no. 413 0213 822

- **Introdution**

Freeworld Internet Access CC trading as Introdution, Company Reg No. 2006/048616/23.

- **Special personal information/data**

Personal information/personal data concerning, amongst other aspects contemplated in terms of Section 26 of Part B of POPIA, a data subject's religious beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric data, or criminal behaviour.

- **Third party**

Any employee, independent contractor, agent, sub-contractor, regulator/s, user of Introdution's websites or mobile app interfaces, or other representative of Introdution.

- **Website**

The website/s owned and operated by Introdution inclusive of <https://www.introdution.co.za> and <https://www.introdution.com>



Introduction

Introduxion places a high premium on the privacy of every person or organisation with whom it interacts or engages with and therefore acknowledges the need to ensure that personal information/personal data is handled with a reasonable standard of care as may be expected from it. Introduxion is therefore committed to ensuring that it complies with the requirements of POPIA, and also with the terms of the GDPR to the extent that the GDPR applies.

This policy regulates the processing of personal information/personal data by Introduxion and sets forth the requirements with which Introduxion undertakes to comply when processing personal information/personal data.

Purpose and application

The purpose of this policy isn't only to inform data subjects on how Introduxion processes their personal information/personal data, but also to establish a standard by which Introduxion, its' employees and representatives will comply in as far as the processing of personal information/personal data is concerned.

Introduxion, in its capacity as a responsible party will strive to observe and comply with its obligations under POPIA and the GDPR (as may be applicable and to the extent necessary) when it processes personal information/personal data from or in respect of any data subject.

Collecting and processing of personal information/personal data

Whenever any data subject contacts Introduxion electronically or telephonically, is contacted by Introduxion electronically or telephonically, completes an online contact request form, or uses one of the products, services, facilities, tools or utilities offered by Introduxion through its website or applicable online applications, Introduxion will in effect be processing the data subject's personal information/personal data.

Introduxion will process personal information/personal data in order to facilitate and enhance the delivery of products and services to its' clients, foster a legally compliant workplace environment, as well as safeguard the personal information/personal data relating to any data subjects which it in fact holds. In such an instance, the data subject providing Introduxion with such personal information/personal data will confirm that they're a competent person and that they have authority to give the requisite consent to enable Introduxion to process such personal information/personal data.

From time to time, it may be that Introduxion has collected a data subject's personal information/personal data from other sources. In the event that a data subject has shared their personal information/personal data with any third parties, Introduxion will not be responsible for any loss suffered by the data subject, their dependents, beneficiaries, spouse/s or employees (as the case may be).

Introduxion undertakes to process any personal information/personal data in a manner which promotes the data subject's constitutional right to privacy, retains accountability and data subject participation. In supplementation of the above, Introduxion will process personal information/personal data for the following purposes:

- To carry out market analysis and client profiling.
- To facilitate and manage the scheduling of meetings with prospective and existing clients, for Introduxion and of behalf of the clients we represent.
- To facilitate the delivery of products/services to prospective and existing clients, for Introduxion and of behalf of the clients we represent.
- To establish a data subject's needs, wants and preferences in relation to the products/services being marketed and promoted by Introduxion, for Introduxion and on behalf of our clients.
- To identify other products and services which might be of interest to both our clients and data subjects in general, as well as to inform them of such products/services.



- To provide or manage any information, products, or services requested by data subjects.
- To help Introduxion identify data subjects when they contact Introduxion.
- To allocate unique identifiers to clients for the purpose of securely storing, retaining and recalling such data subject's personal information/personal data from time to time.
- To maintain records of data subjects and specifically client records.
- To maintain third party records.
- For recruitment purposes.
- For employment purposes.
- For general administration purposes.
- For legal/contractual purposes.
- For health and safety purposes.
- To transact with third parties.
- To improve the quality of Introduxion's products and services.
- To analyse the personal information/personal data collected for market research and statistical purposes.
- Where necessary, to obtain and share information about a data subject's creditworthiness and risk profile with any credit bureau, credit provider or industry body, which includes information pertaining to a data subject's credit history, financial history, judgements, default history and sharing information for purposes of financial risk analysis and related purposes.

When collecting personal information/personal data from a data subject, Introduxion will comply with the notification requirements as set out in Section 18 of POPIA, and to the extent applicable, Articles 13 and 14 of the GDPR.

Introduxion will collect and process personal information/personal data in compliance with the conditions as set out in POPIA and the processing principles in the GDPR (as the case may be), to ensure that it protects the data subject's privacy.

Introduxion will not process the personal information/personal data of a data subject for any purpose other than for the purposes set forth in this policy, unless Introduxion is permitted or required to do so in terms of applicable laws or otherwise by law.

Introduxion may from time-to-time process personal information/personal data by making use of automated means (without deploying any human intervention in the decision-making process) to make decisions about the data subject or their application. In this instance it's specifically recorded that the data subject may object to or query the outcomes of such a decision.

Personal information/personal data for direct marketing purposes

Introduxion acknowledges that it may only use personal information/personal data to contact data subjects for purposes of direct marketing where Introduxion has complied with the provisions of POPIA and GDPR (where applicable) and when it's generally permissible to do so in terms of applicable laws.

Introduxion will ensure that a reasonable opportunity is given to all data subjects to object (opt-out) to the use of their personal information/personal data for Introduxion's marketing purposes when collecting the personal information/personal data and on the occasion of each communication to the data subject for purposes of direct marketing.



Storage and retention of personal information/personal data

Introduxion will retain personal information/personal data it has processed, in an electronic or hard copy file format.

Personal information/personal data will only be retained by Introduxion for as long as necessary to fulfil the purposes for which that personal information/personal data was collected, or as permitted in terms of applicable law.

It's specifically recorded that any data subject has the right to object to the processing of their personal information and Introduxion will retain and store the data subject's personal information/personal data for the purposes of dealing with such an objection or enquiry as soon and as swiftly as possible.

Failure to provide personal information

Where Introduxion is required to collect personal information/personal data from a data subject by law or in order to fulfil a legitimate business purpose of Introduxion, and the data subject fails to provide such personal information/personal data, Introduxion may, on notice to the data subject, decline to render services without any liability to the data subject.

Securing personal information/personal data

Introduxion has implemented appropriate, reasonable, physical, organisational, contractual and technological security measures to secure the integrity and confidentiality of personal information/personal data, including measures to protect against the loss or theft, unauthorised access, disclosure, copying, use or modification of personal information/personal data in compliance with applicable laws.

In further compliance with applicable laws, Introduxion will take steps to notify the relevant regulator/s and any affected data subjects in the event of a security breach and will provide such notification as soon as reasonably possible after becoming aware of any such breach.

Notwithstanding any other provisions of this policy, it should be acknowledged that the transmission of personal information/personal data, whether it be in person, via the internet or any other digital data transferring technology, isn't completely secure. While Introduxion has taken all appropriate, reasonable measures to secure the integrity and confidentiality of the personal information/personal data it processes, in order to guard against the loss of, damage to, or unauthorised destruction of, personal information/personal data and unlawful access to (or processing of) personal information/personal data, Introduxion in no way guarantees that its' security systems are 100% secure or error-free. Therefore, Introduxion doesn't guarantee the security or accuracy of the information (whether it be personal information/personal data or not) which it collects from any data subject.

Any transmission of personal information/personal data will be solely at the own risk of the data subject. Once Introduxion has received the personal information/personal data, it will deploy and use strict procedures and security features to try and prevent unauthorised access to it. As indicated above, Introduxion reiterates that it restricts access to personal information/personal data to third parties who have a legitimate operational reason for having access to such personal information/personal data. Introduxion also maintains electronic and procedural safeguards that comply with the applicable laws to protect your personal information from any unauthorised access.

By accepting the terms and conditions to which this policy relates, the data subject agrees to indemnify and hold Introduxion harmless for any security breaches which may potentially expose the personal information/personal data in Introduxion's possession to unauthorised access or the unlawful processing of such personal information/ personal data by any third party.



Provision of personal information/personal data to third parties

Introduxion may disclose personal information/personal data to a third party where necessary to achieve the purpose/s for which the personal information/personal data was originally collected and processed.

Introduxion will enter into written agreements with such third parties to ensure that they comply with applicable laws pursuant to the processing of personal information/personal data provided to it by Introduxion from time to time.

Transfer of personal information/personal data outside of South Africa

Introduxion may, under certain circumstances, transfer personal information/personal data to a jurisdiction outside of South Africa in order to achieve the purpose/s for which the personal information/personal data was collected and processed.

Introduxion will obtain the data subject's consent to transfer the personal information/personal data to such foreign jurisdiction unless consent isn't required by applicable law.

The data subject should also take note that, where the personal information/personal data is transferred to a foreign jurisdiction, the processing of personal information/personal data in the foreign jurisdiction may be subject to the laws of that foreign jurisdiction.

Access to personal information/personal data

A data subject has the right to a copy of the personal information/personal data which is held by Introduxion (subject to a few limited exemptions as provided for under applicable law).

The data subject must make a written request (which can be sent by email) to the information officer designated by Introduxion from time to time.

Introduxion will provide the data subject with any such personal information/personal data to the extent required by applicable law and subject to and in accordance with the provisions of Introduxion's PAIA manual published in terms of Section 51 of the Promotion of Access to Information Act 2000 (PAIA), which can be sourced on Introduxion's website at www.introduxion.co.za

The data subject can challenge the accuracy or completeness of their personal information/personal data in Introduxion's records at any time in accordance with the process set out in Introduxion's PAIA manual.

Keeping personal information/personal data accurate

Introduxion will take reasonable steps to ensure that personal information/personal data that it processes is kept updated, where necessary and reasonably possible.

Costs to access personal information/personal data

The prescribed fees to be paid for copies of the data subject's personal information/personal data are listed in Introduxion's PAIA manual.

Introduxion reserves the right to make amendments to this policy from time to time.



Complaints to the Information Regulator

In the event that any data subject or third party is of the view or belief that Introduxion has processed their personal information/personal data in a manner or for a purpose which is contrary to the provisions of this policy, the data subject is required to first attempt to resolve the matter directly with Introduxion, failing which the data subject or third party will have the right to lodge a complaint with the Information Regulator, under the provisions of POPIA.

The contact details of the Information Regulator are:

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, Gauteng
Tel No.	+27 10 023 5200
Email	infoereg@justice.gov.za

Contacting us

All comments, questions, concerns or complaints regarding personal information/personal data or this policy, should be forwarded to Introduxion's information officer, as detailed below.

Information officer

Name	Roman Szulc
Email	informationofficer@introduxion.co.za

