

Website Privacy Policy

1. Commitment to your Privacy

- 1.1. Welcome to the Website owned and operated by Afhco. Afhco is committed to protecting the privacy of the user of the Website. Afhco values the trust of its subscribers and all others who work with it, and Afhco recognises that maintaining your trust requires transparency and accountability in how Afhco handles your Personal Information. This privacy policy ("**Policy**") is incorporated into and is subject to Afhco's standard terms and conditions and the general terms relating to the use of the Website.
- 1.2. In performing Afhco's services in the ordinary course of business, Afhco may collect, use and disclose Personal Information. Anyone from whom Afhco collects such information can expect that it will be appropriately and lawfully protected and that any use of or other dealing with this information is subject to consent, where this is required by law. This is in line with the general privacy practices of Afhco.
- 1.3. This Policy sets out how Afhco collects, uses, discloses, and safeguards the Personal Information it processes in the course of its business.

2. Definitions

2.1. In this Policy, in addition to the other terms that have been defined in the body of the Policy, Afhco makes use of the following terms:

2.1.1. "**Personal Information**" means all information which may be considered to be personal in nature or information about an identifiable natural and / or existing juristic person (where applicable) in terms of the Electronic Communications and Transactions Act 25 of 2002 ("**ECTA**"), the Consumer Protection Act 68 of 2008 ("**CPA**") and the Protection of Personal Information Act 4 of 2013 ("**POPIA**"); and

2.1.2. "**User, you, your or yourself**" refers to any person who makes use of the Website for any purposes whatsoever, whether or not such use is free of charge or paid for.
In addition, unless the contrary is specified, terms that are used in the Policy that are specifically defined in POPIA, are given the meanings ascribed to them in POPIA.

2.2. In addition, unless the contrary is specified, terms that are used in the Policy that are specifically defined in POPIA, are given the meanings ascribed to them in POPIA.

3. What personal information does Afhco collect and why?

3.1. Afhco may collect Personal Information in conducting its ordinary business operations, including through the use of its Website. In processing such Personal Information, Afhco at all times ensures that (i) it complies with the provisions of POPIA, and (ii) such Personal Information is used for legitimate business purposes.

4. Obtaining Consent

4.1. Afhco does not, except where otherwise permitted by law, collect, use or disclose your Personal Information without your consent.

5. Use and disclosure of personal information

5.1. Afhco operates its Website, and conducts its business in general, in accordance with South African legislation. Afhco considers it imperative to protect the privacy interests of data subjects.

5.2. In the event that Afhco sends Personal Information outside of South Africa (including if such information is hosted offshore), Afhco will ensure that it takes all reasonable steps to ensure that it complies with all applicable laws in this regard, including POPIA.

6. Retention of personal information

6.1. All Personal Information retained on Afhco's database, including such information obtained through the use of the Website, is in accordance with the retention provisions set out in the applicable laws and regulations of South Africa, including those set out in POPIA.

7. Your rights in relation to your personal information

7.1. It is important to note that you have rights in relation to your Personal Information.

7.2. You have the right to contact Afhco at any time to ask Afhco to confirm that it holds your Personal Information (at no charge);

7.2.1. provide you access to any records containing your Personal Information or a description of the Personal Information that Afhco hold about you (subject to payment of a prescribed fee); and / or

7.2.2. confirm the identity or categories of third parties who have had, or currently have, access to your Personal Information (also subject to payment of a prescribed fee).

7.3. When you make a request regarding your Personal Information, Afhco will take reasonable steps to confirm your identity.

7.4. There may be times when Afhco cannot grant access to your Personal Information, including where granting you access would (i) interfere with the privacy of others, or (ii) result in a breach of confidentiality. Afhco will always provide you with reasons if this is the case.

7.5. If you are of the view that any Personal Information that Afhco holds about you is incorrect in any way, including that it is inaccurate, irrelevant, outdated, incomplete or misleading, you are allowed to ask Afhco to correct it. If you believe that any Personal Information that Afhco holds about you is excessive or has been unlawfully obtained, you can ask Afhco to destroy or delete it. You may do the same if you think that Afhco has retained it for longer than necessary, given the purpose. Afhco will do so unless there are good grounds not to (such as that Afhco is required to hold it for a period prescribed by any applicable legislation).

7.6. It is important, however, to understand that if you withdraw your consent for Afhco to use some of your Personal Information, it may affect the quality and level of service that Afhco can provide to you.

8. Security

8.1. Afhco has adopted a security model to protect your Personal Information that complies with generally accepted information security practices and procedures. As part of Afhco's security systems, Afhco has implemented fire-wall technology, password controls, encryption processes and antivirus software. This is in addition to the physical security measures adopted by Afhco to ensure that it takes all appropriate, reasonable technical and organisational measures to prevent (i) loss of, damage to, or unauthorised destruction of Personal Information, and (ii) unlawful access to or processing of Personal Information. Afhco has a stringent security policy in place that every officer, employer and supplier of Afhco must adhere to.

8.2. Afhco confirms that it takes all reasonable measures to:

8.2.1. identify all reasonably foreseeable internal and external risks to any Personal Information in its possession or under its control;

8.2.2. establish and maintain appropriate safeguards against any risks that are identified by Afhco;

8.2.3. regularly verify that these safeguards are effectively implemented by or on behalf of Afhco; and

8.2.4. ensure that such safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

9. Cookies Policy

9.1. This is our Cookie Policy which works hand-in-hand with our Privacy Policy. This policy is intended to provide you with a description of what cookies are, what it will be used for, and a guidance on how to manage it when browsing our website.

9.2. What are cookies?

When visiting our website, small text files, referred to as 'cookies', could be stored on your device. Even though these cookies do not store personal information, it may collect personal identifiers such as your name or email address which allow us to link personal information with your device. This ultimately allows us to recognise your device whenever you visit our website.

9.3. Why the cookies are used?

The cookies on our site are used to:

9.3.1. tailor and improve your experience on our website by remembering your preferences, location and device;

9.3.2. provide you with content that suits your preferences

9.3.3. ensure advertisements are tailored to your preferences

9.4. Which cookies are used?

Our websites make use of an array of cookies. You are able to remove these cookies at your own discretion. For example, you may decide to delete the cookie as soon as you leave our website or maybe only in a month's time. These cookies will remain on your device until you delete them. The following cookies are used on our website:

9.4.1. essential cookies: This is necessary to ensure the website is able to function properly.

9.4.2. functional cookies: These cookies help our website to remember information about you such as your preferences or log-in details e.g. username and password.

9.5. Personal Information

Our cookies collect the following personal information from you:

9.5.1. name and surname;

9.5.2. contact details (cellphone and email);

9.5.3. log-in password;

9.6. No other personal information is collected on our website unless you provide this to us by either:

9.6.1. lodging a complaint

9.6.2. providing feedback/ a compliment

9.6.3. your email and other contact details will be processed when logging a complaint or providing feedback/ a compliment.

9.7. Usage and disclosure

The information provided will be used in accordance with the purpose you provided it to us.

But the other information specifically provided to us when you for example, submit a complaint, will not be disclosed to anyone outside of Afhco. Your personal information will only be disclosed to Third Parties where circumstances are limited and where it is in accordance with the POPI Act requirements e.g. for legal proceedings.

9.8. Website Analytics

Afhco website servers will collect the IP address you use to visit our website. This information is then used to analyse specific information such as e.g. determining how many individuals visited the website, how long they stayed on the website etc. Our Third Party, e.g. Google Analytics uses this information to improve Afhco's website.

9.8.1. Below is a list information collected when visiting our website, which is used for its improvement:

9.8.1.1. When you visited the website [date and time]

9.8.1.2. Your IP address

9.8.1.3. The pages you accessed

9.8.1.4. Your web browser e.g. Google Chrome, Microsoft Edge etc.

9.8.2. The website will/does not override any settings on your browser e.g. 'do not track'

9.9. Links to Social Networking Services

Afhco makes use of LinkedIn, Facebook, Twitter, You Tube and Instagram to communicate with its clients about its work. These platforms may collect your personal information for its own purpose, should you communicate with us via these platform.

The above-mentioned platforms may track your use of our website if you clicked on a link to our website through the platform.

9.10. How to delete the cookies?

It is possible, that your browser may be set to automatically accept cookies. However, you are able to manually delete the cookies. We have provided steps on how to delete cookies in Google Chrome below.

9.11. How to remove cookies in Google Chrome:

- Open Google Chrome.
- Click on the three dots in the top-right corner of your browser. A drop-down menu will appear.
- Click on Settings in the drop-down menu. Settings will open in a new tab.
- Click on 'Clear browsing data'.
- A new tab will open. The tab will be called 'Basic'.
- It will provide a list of items you can delete e.g., browsing history, cached images, and files, etc. You need to select 'Cookies and other site data'. Choose the time from when you would like to delete your browsing history e.g., all-time, last hour, etc.

- If you have logged into your Gmail account on the device, be sure to sign out, or else the cookies (and possibly history, whichever options you selected) on other devices you are signed into will be deleted too.
- Once you have selected 'Cookies and other site data' and the time range, you can click on 'Clear data'.

Please note, not accepting cookies may lead to you being unable to access our website or specific content displayed on the website.

10. Third-party Websites

10.1. The Website may contain links to third party websites. In the event that you follow a link to any of these websites, it is important to note that these websites have their own terms of use and privacy policies and that Afhco does not accept any responsibility or liability for them. If you (i) are a client of Afhco, or (ii) are a user of the Website, and you have purchased products or services from Afhco, Afhco may use your contact details to send you details of any new similar products or services which Afhco thinks you would be interested in. In doing so, Afhco will at all times comply with any applicable direct marketing laws.

10.2. Any communications that you do receive from Afhco pursuant to clause 11.1 will set out how to opt out of receiving future communications from Afhco, free of charge, if you no longer wish to receive material for any reason whatsoever. Afhco will only send you marketing messages when you tick the relevant boxes at certain times when engaging with Afhco.

10.3 As Afhco is not responsible for any representations, information, warranties and / or content on any Website of any third party (including websites linked to this Website), Afhco does not exercise control over third parties' privacy policies and the onus is on the User to refer to the privacy policy of any such third party before providing them with any of your Personal Information.

11. Updating of Privacy Policy

11.1. Afhco, in its sole discretion, reserves the right to update, modify or amend this Policy from time to time with or without notice. You therefore agree and undertake to review the Policy whenever you visit the Website. Save as expressly provided to the contrary in this Policy, any amended version of the Policy shall supersede and replace all previous versions thereof.

12. Contact Information

12.1 Questions, concerns or complaints related to this Policy or Afhco's treatment of Personal Information should be directed to Customer Services at customerservices@afhco.co.za