

**Worktrainer Compliance Solutions**

**South Africa (Pty) Ltd.**

(Company Registration 2013/135178/07)

Trading as



# **PRIVACY POLICY**

**PREPARED IN TERMS OF PROTECTION OF PERSONAL  
INFORMATION ACT 4 OF 2013 (“POPI”)**

This Privacy Policy explains how Worktrainer Compliance Solutions South Africa Pty. Ltd., company registration number 2013/135178/07, trading as “Worktrainer Compliance”, (“we”, “our” or “us”), collects and handles your personal information, whether it has been directly collected by us, or has been provided to us while providing services to our clients. It applies to all personal information, whether it has been collected or received offline or online, including through our website.

## Personal Information

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The types of personal information we may collect about you may include

### 1. INFORMATION WE MAY COLLECT

#### 1.1 *Contact Information*

When you provide us with your contact information, whether through use of our services, completing a form on our website, or through an interaction with our sales or customer support team, we may collect your contact information. This information may include your name and email address.

#### 1.2 *Usage Information*

We may collect usage data about you whenever you interact with our Services. This may include which web pages you visit, what you click on, when you performed those actions, and other activities.

#### 1.3 *Device & Browser Data*

We may collect data from the device you use to access our services, such as your IP address and browser type. This information may also tell us your location.

#### 1.4 *Cookies & Page Tags*

We may use third party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymous data about visitors to our websites. This data includes usage and user statistics.

#### 1.5 *Referral Data*

If you navigate to our website from an external source, such as a link on another website or via an email, we may record information about the source that referred you to us.

### 1.6 *Other Data you submit*

We may collect your personal information or data if you submit it to us in other contexts. For example, by giving us a testimonial or endorsement.

### 1.7 *Social Media Interaction*

We may collect personal information about you when you interact with us using social media, or other channels such as LinkedIn.

### 1.8 *Third Parties*

We may collect your personal information or data from Third Parties if you give permission to them to share your personal information with us, or where you have made that information publicly available online.

## **2. INFORMATION SPECIFIC TO ADMINISTRATORS**

### 2.1 *Registration Details*

When you register an account, or another administrator creates an account for you, we may collect your name, company name, email address, password, and other information.

### 2.2 *Billing Details*

If you use a credit card for billing, our credit card processor or payment gateway may collect information such as your cardholder's name, billing address, email address, credit card number, expiry date, and credit card security code. Worktrainer does not collect this type of information.

### 2.3 *Account Settings*

You may be able to set or update various preferences and personal details on your account settings page or your profile. For example, your name, email address or default language.

## **3. INFORMATION SPECIFIC TO EMPLOYEES**

We may collect the following types of personal information directly from you, your employer, or a third party

### 3.1 *Your name*

### 3.2 *Images of you*

### 3.3 *Your contact details, including email address, mailing address, street address, and telephone number*

### 3.4 *Details of performance management*

### 3.5 *Your age and date of birth; and*

### 3.6 *Your health and sensitive information, as set out below.*

# Collection & Use of Personal Information

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We use your personal information for a variety of purposes. How and what information we collect about you will depend on the way you use our services, for example, whether you are an Administrator, Employer, visitor to our website, or a member of staff. In each case, the information we collect and hold is reasonably necessary for our business, including providing you with the services you would expect from us.

For **ADMINISTRATORS**, we may use your personal information

- *To create an account with us*  
We need to collect and use your personal information to allow you to create an account and log into that account.
- *To provide you with services*  
This includes providing you with access to our platform, use of our programme, and customer support. This may require us to access your personal information so that we can assist you with technical issues.
- *To manage our Services*  
We use your personal information internally to measure and analyse user behaviour so we can provide our services. Some of these purposes include
  - monitoring, maintaining, and improving our service offering
  - enforcing contracts and policies where potential breaches exist; or
  - preventing potentially illegal, undesirable, or abusive activities.
- *To contact you about services or your account*  
At times we may need to contact you via email, mail, or telephone to tell you about matters such as changes to our services, terms or policies.
- *For marketing purposes*  
We may also send you news and information about our products or services that you either request from us, or we believe may interest you. In most cases, we will contact you via email.
- *In response to legal requests, or to prevent harm*  
If we receive a legal request, or are informed of a situation that may potentially cause harm to someone, we may need to inspect your personal information or data in order to respond appropriately to that request or threat.

For **VISITORS** to our website, we may use your personal information to

- *Contact you for marketing purposes*  
If you sign up to our newsletter, we may send you news and information about our products or services.
- *Manage our services*  
We use your personal information internally to measure and analyse user behaviour so we can provide our services and improve those services.

For **EMPLOYEES** or staff members, we may use your personal information to

- *Provide services to our clients*  
We collect, use, and store your personal information to provide services to our clients to help mitigate risk and create a safe workplace for you.

## Disclosure of Personal Information to Third Parties

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We will share your personal information with Third Parties only in ways described in this Privacy Policy.

To provide you with our services, we will often need to disclose your personal information to our staff or the service providers we use to operate our business. Examples of our service providers include hosting services, project management software, email service providers, system monitoring services, customer support services, and website analytics. These companies are only authorised to use your personal information as necessary for us to provide our services to you.

In most cases, the information that we disclose to our staff or service providers will be directly necessary to provide our services to you. However, there may be occasions where we need to disclose your personal information to other Third Parties or for other purposes, including to

- *Our staff, suppliers, or professional advisors*  
We may need to disclose your personal information to people who work for us or are for one of our suppliers.
- *Prevent illegality or enforce our terms and policies*  
If you engage in or threaten any unlawful activity, we may reasonably believe that it is necessary to disclose your personal information to the police, a relevant authority or enforcement body, or your internet service provider, employer, supervisor, or network administrator.

- *Perform actions you request or consent to*  
You may specifically authorise us to disclose your personal information to a Third Party. For example, to resolve a dispute regarding our Terms, or to integrate a third-party service. We may also disclose your personal information to a Third Party with your prior consent.
- *Comply with legal requests*  
In some situations, we may be compelled to disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose your personal information to Third Parties such as law enforcement officials, or to comply with court orders, such as subpoenas or other legal processes.
- *Merge or sell our business*  
If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email, and/or a prominent notice on our website, of any change in ownership, uses of your personal information, and choices you may have regarding your personal information.

By providing us with personal information, you acknowledge that some Third Parties may not be regulated by the South African Protection of Personal Information (“POPI”) Act of 2013, and if any Third Party engages in any practice that contravenes the principles of the POPI Act, it would not be accountable under South African legislation, and you will be unable to seek redress under this Act.

## Treating Sensitive Personal Information

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Sensitive information is a sub-set of personal information, that is given a higher level of protection under South African Privacy Principles. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information, or biometric information.

Employers may provide us with sensitive information for them to comply with their reporting requirements. We may receive the following information from employers

- Details of work health and safety incidents
- Existing health conditions
- Medical certificates or other health information; and
- Return to work documentation which may contain health information.

Sensitive information may be used or disclosed if required or authorised by law.

# Controlling your Personal Information

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- ***Choice and consent***

By providing personal information to us, you consent to us collecting, holding, using, and disclosing your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us; however, if you do not, it may affect your use of this website or the products and/or services offered on or through it.

- ***Information from Third Parties***

If we receive personal information about you from a Third Party, we will protect it as set out in this Privacy Policy. If you are a Third Party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

- ***Restrict***

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

- ***Access***

You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information.

- ***Correction***

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

- ***Complaints***

If you wish to make a complaint about how we have handled your personal information, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

- ***Unsubscribe***

To unsubscribe from our e-mail database, or opt-out of communications including marketing, please contact us using the details below.

## Storage & Security

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We are committed to ensuring that the personal information we collect is secure. To prevent unauthorised access or disclosure, we have put in place comprehensive and effective physical, electronic, and managerial procedures to safeguard and secure personal information, and to protect it from misuse, interference, loss, and unauthorised access, modification, and disclosure.

Nevertheless, we cannot guarantee the security of any information that is transmitted to, or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take appropriate measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## Cookies & Web Beacons

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We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. If, and when you choose to provide our website with personal information, this information may be linked to the data stored in the cookie.

We may use Web Beacons on our website from time to time. Web Beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page, or to deliver a cookie to the browser of a visitor viewing that page.

## Links to other websites

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Our website may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Variations

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We may, at any time, and at our discretion, vary this Privacy Policy by publishing changes to this policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

## Contact

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For questions, corrections, complaints, or opt-out requests, please contact us at [info@worktrainer.co.za](mailto:info@worktrainer.co.za)