

1. **Introduction**

- (1) Ramsay Webber is committed to safeguarding the privacy of visitors to our website and recognises the importance of protecting your privacy and your personal information (as defined in Protection of Personal Information Act 4 of 2013 - **POPI**) collected by us when you use this website.
- (2) You are not required to provide any personal information on the public areas of this website. However, you may choose to do so voluntarily by using certain website functionality or subscribing to newsletters.
- (3) This privacy policy represents our best attempts to balance your reasonable privacy expectation and our legitimate business interests and, therefore we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information.
- (4) By continuing to use this website you agree that we may "collect, collate, process and/or store" your personal information (as these terms are defined in POPI) (**process**) to provide you with access to the website and the website content or for any other legitimate purposes.
- (5) Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify you and the relevant regulator, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede any investigation.

2. **Types of personal information we may process**

- (1) The types of personal information that we may process include information necessary for our legitimate business interest and the categories of personal information defined in POPI which may include your name and surname, identity or passport numbers, e-mail and physical addresses, postal address, contact information, information relating to your occupation and the pages of the website viewed by you.
- (2) We will limit the types of personal information we process only to those which are necessary for our legitimate business interests.

3. **Processing of personal information**

- (1) Personal information may be processed when you complete application forms for subscription, when you browse the site or when you submit information pursuant to website prompts.

- (2) You acknowledge that all personal information processed by us may be stored by us and used for any of the purposes listed below.

4. Use of personal information

We will only use the information you provide to us on these sections of the website in order to process the relevant application or registration form.

5. Sharing of personal information

- (1) You consent that we may disclose your personal information third party service providers where necessary and agree that once your information has been deleted it may be shared under the following circumstances, namely –
 - (a) to our agents, advisers, service providers and suppliers (our SEO agency, creative, brand, digital and media agencies) Microsoft, Google and other research agents);
 - (b) to monitor web traffic: web servers serving the website automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits;
 - (c) for statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the website (for product development purposes);
 - (d) to government and law enforcement agencies, where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of this policy or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

6. Your rights

- (1) You have the right to –
 - (a) to request that we correct, destroy or delete any of your personal information that we have processed in accordance with this policy. The personal information that you may request us to correct, destroy or delete is personal information that has been processed that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.

- (b) withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that the withdrawal does not affect the processing of your personal information –
 - (i) before the withdrawal of your consent; or
 - (ii) if the processing is in compliance with an obligation imposed by law on us; or
 - (iii) where such processing is necessary for the proper performance of a public law duty by a public body;
 - (iv) as required to finalise the performance of a contract in which you are a party; or
 - (v) as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- (c) object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.
- (d) make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests; our legitimate interests or the legitimate interests of a third party to which the information is supplied.
- (e) object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- (f) not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- (g) not to be subjected to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you.
- (h) submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in

accordance with this policy. The Information Regulator's contact details will be published by the Government in due course in terms of POPI.

- (i) institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.
- (2) Decisions that you may not be subjected to are decisions that result in legal consequences for you or affect you to a substantial degree –
- (a) without being for the execution of a contract that you have received performance for; or
 - (b) decisions made that are not in terms of law or of a code of conduct that specifies what appropriate measure must be taken to protect your legitimate interests.

7. Use of cookies

- (1) Cookies are pieces of information a website transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving your preferences and tracking your online habits, traffic patterns, and making sure you do not see the same advertisement too often. The use of cookies is an industry standard.
- (2) We may place a cookie on your browser to store and sometimes track information about you.
- (3) While most browsers are initially set up to accept cookies, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. Please note that some parts of the website will not function properly if you refuse cookies.

8. Use of IP address

- (1) An IP address is a number that is automatically assigned to a computer whenever it is connected to the Internet. We log IP addresses or the location of computers on the Internet.
- (2) We collect IP addresses for the purposes of system administration and to audit the use of the website. We do not ordinarily link IP addresses to personal information, which means that your session may remain anonymous. However, we cannot guarantee that this will always be the case, as it may be necessary to identify a particular user when it is necessary to enforce compliance with the Privacy Policy or to protect our website, its users or other interests.

9. Links to other sites

When you are using the website, you could be directed to other sites that are beyond our control. These other web sites may send their own cookies to you collect data or solicit personal information. We do not control the privacy policies of those third party web sites.

10. **Contact Information**

- (1) If you have any questions in relation to this policy please contact us at: info@ramweb.co.za.
- (2) If you currently receive marketing information from us which you would prefer not to receive in the future please email us at info@ramweb.co.za.