

## Privacy Policy

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This policy was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This policy applies to

Prolab Business Services trading as Arran Access

Registration number: 2016 / 505533 / 07

And its subsidiaries

(hereinafter The Company)

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This Privacy Policy describes our policies and procedures on the collection, use and disclosure of Your information when you make use of our services. It details Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve our services. By using our services You agree to the collection and use of information in accordance with this Privacy Policy.

This Privacy Policy applies to personal information that Arran Access Collects through our website: [www.arranaccess.com](http://www.arranaccess.com), any email sent to our Company, or through any of our social media pages.

### Definitions:

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

- **Account** means any platform you use to interact or engage with our Company
- **Company** (referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement) refers to Arran Access, Gauteng, Johannesburg.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device, either temporarily for your browsing session or permanently. Cookies provide a way for the website to recognize you and keep track of your preferences and your browsing history.
- **Country** refers to South Africa
- **Data** means information in electronic form
- **Data subject** means the person to whom personal information relates
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

- **IP Address** means a unique address that identifies a device on the internet or a local network.
- **Personal Information or Data** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:
  - Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - Information relating to the education or the medical, financial, criminal or employment history of the person;
  - Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - The biometric information of the person;
  - Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - The views or opinions of another individual about the person; and
  - The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- **POPIA** means the Protection of Personal Information Act.
- **Service** refers to all our services, website, social media and email interaction and engagements.
- **Service Provider** means any natural or legal person who possesses the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or assist the Company in analysing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Traffic Data or Usage Data** means any data processed for the purpose of the conveyance of a communication on an electronic communications network in respect of that communication and includes data relating to the routing, duration or time of a communication.
- **User** means a person who uses a computer or other device to access this website or any of our Social Media pages, blogs or to send us an email.
- **Website** refers to Arran Access Website or Social Media Pages, accessible from [www.arranaccess.com](http://www.arranaccess.com)
- **Web browser** means an application used to access and view this website. Well known web browsers include Internet Explorer, Google Chrome and Safari.
- **You** means the individual accessing or using the Service, or the Company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Please be advised that we do not collect Personal Information unless You provide it to us. If You provide it to us the information is held by the Company's Register and Information Officer.

Personally identifiable information may include, but is not limited to:

- First and last name
- Email address
- Phone number
- Physical address
- Age
- Race
- Gender
- Usage Data

### **Usage Data and Disclosure**

We will only use personal information that you provide to us for the purposes for which you provided it. We will not make Your personal information available to any third party unless this is necessary for the purpose for which You provided the information. We will only disclose Your information to third parties in limited circumstances where authorised by POPIA or should You provide Us with written consent to do so.

Under certain circumstances, the Company may be required to disclose Your personal Data and Information if required to do so by law or in response to valid requests by public authorities ( e.g: A court or a government agency).

We may use Your personal information for the purpose of administering and improving our site, improving our services or communicating with You.

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

### **Information from Third-Party Social Media Services**

The Company uses Social Networking Services such as Facebook, Twitter, Instagram and Blogger to communicate with the public about its work. When You communicate with the Company through these services, that Social Networking provider may collect Your Personal Information for its own purposes. These services may track Your use of the Company's website on those pages where their links are displayed. If You are logged into those services (including any Google service) while using the Company's website, their tracking will be associated with Your profile with those service providers. These services have their own privacy policies which are independent of the Privacy Policy of the Company.

If You chose to provide the Company with Personal Information through any Third-Party Social Media service or App You are giving the Company permission to use, share and store it in a manner consistent with this Privacy Policy.

### **Website Analytics, Tracking Technologies and Cookies:**

You may visit any of our sites or Social Media without providing any Personal Information. The website servers will in such instances collect the IP address used by the Data Subject / You to access the website, but not the email address or any other personal identifiable information. The information on IP addresses is aggregated to measure the number of visits, the average time spent on the website, pages viewed, etc. The Company analyses non-identifiable traffic data to improve our service, via a third party programme namely Google Analytics.

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information to improve and analyse our service.

The Company may collect, hold, and use statistical information about the website visits to help us improve the website. Such information includes:

- Your IP address
- The search terms You used
- The pages accessed on the Company's site and the links visitors clicked on
- The date and time You visited the website
- The referring website (if any) through which You clicked through to the Company's site, and
- The type of web browser You use

The traffic data is aggregated and is not personally identifiable. Our website analysis will also respect any "do not track" setting You may have set on Your web browser.



Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web Browser.

Cookies or Tracking Technologies do not collect any personal information about You.

### Use of Your Personal Data:

Should you provide Us with Your Personal Data the Company may use it for the following purposes:

- **To provide and maintain Our Service:** including to monitor the usage of our Service.
- **For the purpose of Consent:** to use Your information for any of the items or services requested by You.
- **To Contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application’s push notifications regarding updates or informative communications related to the functionalities, products or contracted services, events, notices, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which offer that are similar to those You have already enquired about or shown interest to, unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifiable usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, marketing and Your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with service providers to monitor and analyse the use of Our service, to contact You.
- **With Partners and/or Affiliates:** We may share your information with Our partners or affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our Partnered Company’s and any other joint venture partners or companies that We control or that are under common control with Us.
- **With other Users:** When You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your written Consent.

### Retention of Your Personal Data:

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Data Usage for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

### Security of Your Personal Data:

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and the POPI Act.



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Prepared by: Chantelle Morrison  
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#### **Transfer of Your Personal Data:**

Your information, including personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to – and maintained on computers located outside of your city, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your Country.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

No transfer of Your Personal Data will take place to an Company or a country unless there are adequate controls in place including the security of Your data and other personal information.

#### **Children's Privacy:**

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact us. If We became aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on Consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

#### **Links to Other Websites:**

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any this party sites or services.

#### **Your right to access and correct personal information:**

The Company will provide you with access to any personal information We have about You. You may also request the Company to correct Your personal information. Kindly contact the Information Officer at [info@arranaccess.com](mailto:info@arranaccess.com) to access or correct your personal information.

You can ask to be removed from any of the Company's subscription lists or Database at any time.

#### **Changes to this Privacy Policy:**

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### **Contact Us:**

If you have any questions about this Privacy Policy, You can contact us by email: [info@arranaccess.com](mailto:info@arranaccess.com)

This Privacy Policy was adopted and updated by the Members of Arran Access on 14 June 2021.