

Date: 24 August 2017

## **URUP PRIVACY POLICY**

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## **1. ABOUT THIS POLICY**

- 1.1. We takes cognisance of the right to privacy as enshrined in the Constitution of the Republic of South Africa and the relevant legislation to protect the right to privacy, such as the Protection of Personal Information Act.
- 1.2. This policy sets out what categories of information URUP may collect from you when you use the software as well as how URUP processes that information.
- 1.3. By using the Website or the Software you warrant that you are over the age of 18 (eighteen) years old and acknowledge that URUP may collect the information, as contained herein, from you.
- 1.4. If you have any questions about this policy or do not agree with it, please contact URUP at [legal@urup.com](mailto:legal@urup.com) before using the software. URUP may amend this policy from time to time, so you should check this page from time to time to ensure that you are aware of any changes that have been made.
- 1.5. This policy is effective from 10 June 2016.
- 1.6. By using any part of the software or providing information to URUP you consent to URUP processing your information as set out in this policy.

## **2. INCORPORATION BY REFERENCE**

- 2.1. This policy incorporates the provisions (and their subordinate provisions) as contained in the general terms and conditions of URUP by reference.
- 2.2. The provisions incorporated into this policy from the terms and conditions must be read as being applicable to this policy, to the extent doing so does not materially change their meaning.
- 2.3. In the event that the provisions of this policy conflict with the terms and conditions, the provisions of this policy will prevail to the extent of the conflict.

## **3. MINORS**

- 3.1. If you are not yet 18 (eighteen) years old, you may only use URUP with the consent of a parent, guardian or competent person.
- 3.2. In the event that we have collected personal information from a child younger than 18 (eighteen) years, without the necessary consent, we will delete that information as soon as reasonably possible.
- 3.3. If you believe that we may have collected any information about a child younger than 18 (eighteen) years without the necessary consent required to do so, please notify us immediately.

## **4. INFORMATION COLLECTED BY URUP:**

- 4.1. THROUGH THE SOFTWARE:

- 4.1.1. In general, you may navigate the software without directly providing URUP with any personal information.
- 4.1.2. Any domain name information that URUP collects is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the software and the web pages viewed.
- 4.1.3. URUP uses this information to measure the usefulness as well as the usability of the software and to improve its contents. However, additional services may be only available if URUP has certain information about you.
- 4.2. AUTOMATICALLY:
  - 4.2.1. When you use the software, URUP automatically receives and records information from your browser and device platform, including interaction data, the hardware used to access our software, your mobile service provider, the operating system, your location, IP address, cookie information which includes your preferences for the software, surfing patterns and the page you requested. This information is stored in URUP's server logs.
  - 4.2.2. URUP only uses this data in aggregate form and URUP may provide this aggregate information to URUP's associates to indicate how URUP's customers, collectively, use the software, so that URUP's associates may also understand how users make use of the software.
- 4.3. COOKIES
  - 4.3.1. URUP may use cookies, files that store information on your hard drive or in your browser, to determine whether you have visited the website where the software is hosted before and make it easier for you to maintain your preferences on the website and software.
  - 4.3.2. By seeing how you use the software, URUP can tailor the software around your preferences and measure usability of the software.
  - 4.3.3. You can, should you choose to, disable cookies in your browser and delete all cookies currently stored on your computer. You can do this by modifying your browser's preferences appropriately.
- 4.4. FROM YOU:
  - 4.4.1. Information about the content and services you express an interest in when you use the software;
  - 4.4.2. Your name and contact information, including email address and company details which you may choose to submit to URUP when you interact with the software;
  - 4.4.3. Information about your location or similar location based information;

- 4.4.4. Information regarding your personal or professional interests, demographics, experiences with URUP's services and contact preferences in order to provide you with further correspondence about URUP's services.
- 4.4.5. We will take reasonable steps to ensure that your personal information is complete, accurate, not misleading and updated where necessary.

## **5. FACEBOOK / TWITTER**

Your engagement information may be shared and posted to your Facebook or Twitter account should you elect this option.

## **6. SECURITY**

- 6.1. URUP is committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure URUP has physical, technical and administrative measures in place which safeguard the personal information URUP collects through the software. URUP uses encryption when collecting or transferring sensitive personal information, including passwords, or other information.
- 6.2. We have a responsibility to notify you if your personal information is accessed or acquired by an unauthorised person and we will notify you by way of electronic mail to your e-mail address.
- 6.3. We will collect your personal information directly, unless the collection of your information by another source will not prejudice you.
- 6.4. Despite our efforts to ensure the privacy and security of your data, the Internet is not a secure medium and your privacy cannot be guaranteed at all times.
- 6.5. We will not be responsible for any damages you or any third party may suffer as a result of the transmission of confidential or disclosed information that you make through our Website or Software, or for any errors or any changes made to any transmitted information.

## **7. LINKING**

- 7.1. Upon the client's request, URUP may link to other third party websites which are not within its control.
- 7.2. URUP will not be responsible for the protection of any personal information which you provide to third parties.
- 7.3. You should exercise caution and view privacy statements applicable to third party websites or services.

## **8. HOW URUP USES YOUR PERSONAL INFORMATION**

### **8.1. PROCESSING:**

- 8.1.1. We process information lawfully by insuring that we are:

- 8.1.1.1. accountable;
  - 8.1.1.2. purposes specific;
  - 8.1.1.3. further processing is limited;
  - 8.1.1.4. maintaining quality information; and
  - 8.1.1.5. security safeguards are in place.
- 8.1.2. If you choose not to provide your personal information to us, it may result in us being unable to provide goods and services to you;
- 8.2. URUP USES YOUR PERSONAL INFORMATION FOR THE FOLLOWING REASONS:
- 8.2.1. to render services to you;
  - 8.2.2. to provide services you have requested and to notify you about important changes to the software;
  - 8.2.3. to respond to your inquiries and complaints or to process your requests in relation to your information;
  - 8.2.4. to follow up on any inquiries and complaints as part of URUP's customer care procedures;
  - 8.2.5. to update URUP's records about you and for the purpose of retaining records about you;
  - 8.2.6. to communicate with you in the course of URUP's ordinary business activities;
  - 8.2.7. to improve URUP's content and services by making them easier to use and by providing access to certain sections of the software;
  - 8.2.8. to prevent or detect any unlawful activities; and
  - 8.2.9. to evaluate the effectiveness of URUP's marketing and for the purposes of research, training and statistical analysis in order to improve URUP's services.
- 8.3. Should URUP request any personal information from you, URUP will furnish you with details on how the personal information you provide will be used.
- 8.4. URUP or its associates may contact you by e-mail, phone, fax or post for the purposes set out in this section.
- 8.5. By submitting such information to URUP, you are deemed to have agreed to URUP or its associates contacting you using these methods of communication.
- 8.6. URUP or its associates will continue to contact you using the methods you chose until you advise URUP or its associates in writing that you no longer wish to be contacted using such methods.

- 8.7. Please note that you are required to accept at least one of the above methods as your chosen method of receipt of communication from URUP.

## **9. SHARING YOUR PERSONAL INFORMATION**

- 9.1. URUP will not transfer, disclose, sell, distribute or lease your personal information to third parties other than on the following basis:
- 9.1.1. where URUP has your consent to do so for the purpose of providing a service to you;
- 9.1.2. where it is required by URUP's associates who may, directly or indirectly, render certain services to URUP or to you or in undertaking activities linked to the operation of such services on URUP's behalf; or
- 9.1.3. where the disclosure is in compliance with legal and/or contractual requirements that URUP is subject to, including, but not limited to, intergovernmental agreements.
- 9.2. URUP will not pass your personal information to third parties (other than on the basis set out in this policy and in accordance with appropriate disclosure requirements URUP may be subject to) without your consent.

## **10. ACCESSING YOUR PERSONAL INFORMATION**

- 10.1. If you think that any personal information URUP holds about you is incorrect or incomplete, please write to or e-mail URUP ([info@urup.com](mailto:info@urup.com)) as soon as possible. URUP will take the necessary steps to ensure that your personal information is corrected and/or updated.
- 10.2. You may also request access to the information we store about you by sending a request to us at [info@urup.com](mailto:info@urup.com).

## **11. REMOVAL OF PERSONAL INFORMATION**

You may send a written request that we anonymize your personal information. Due to the design of the URUP platform we cannot delete records we will however anonymize your profile removing all personal information.

## **12. RETENTION**

- 12.1. We retain records of your personal information only for as long as we are required to do so by law or for as long as we reasonably require such retention for the purposes of rendering our services.
- 12.2. As soon as we no longer require your personal information, this information is destroyed and/or deleted in a manner that prevents reconstruction in an intelligible form.

**13. OBJECTION TO DIRECT MARKETING**

If you object to your personal information being used for the purposes of direct marketing as defined in the Consumer Protection Act, or for the purposes of unsolicited electronic information, please send a written request to us to remove your details from the database at [info@urup.com](mailto:info@urup.com) and we will remove the information within five (5) days.

**14. REGULATOR OF PERSONAL INFORMATION**

Although the POPI Act makes provision for a Regulator to protect your personal information, this has not been established yet. In the interim, if you have a complaint, please contact us on [info@urup.com](mailto:info@urup.com).

This Privacy Policy was updated on Thursday, 08 September 2016