

# CycloWorx - Privacy Policy

## 1. INTRODUCTION

This website [www.CycloWorx.com](http://www.CycloWorx.com) (the Website) is operated by CycloWorx ("CycloWorx").

References to "CycloWorx", "we", "us", "our" and "ours" in this Privacy Policy shall mean CycloWorx.

The terms "you", "your" and "yours" when used in this Privacy Policy shall mean any user of this Website.

## 2. PURPOSE OF THIS PRIVACY POLICY

We are committed to the privacy and confidentiality of information provided to us. The purpose of this Privacy Policy is to provide information to assist you to understand how we collect, use and share your personal information and to inform you of our privacy policy with regard to any personal information collected by us from you directly and/or through the Website or the use of our products or services.

Personal information means information which identifies you, and includes inter alia information such as your name, email address, telephone number, biometric information, as well as any other personal data collected and shall include any information which you provide to us.

By visiting this Website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this Privacy Policy.

## 3. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We are committed to informed and limited collection of essential personal information.

### 3.1 Personal information collected through the use of our Website

Various technologies may be used on our Website in order to improve it, make it more user-friendly, effective and secure. These technologies may lead to personal information being collected automatically by us or by third parties on behalf of us. Examples of such technologies include cookies, flash cookies and web analytics. This technology does not identify you personally; it simply enables us to compile statistics about our visitors and their use of our Website.

This personal information can include the following:

- the user's IP address;
- the date and time of the visit;
- the referral URL, being the site from which the visitor has come;
- the pages visited on our website;
- information about the browser used, such as the browser type and version, operating system, and so forth.

### 3.1.1 What you should know about cookies

Cookies are small text files generated by a website and stored in your web browser.

CycloWorx uses cookies to ensure your visit to our website is as pleasant as possible. There are different types of cookies with different uses, some of them allow you to browse this Website and make use of certain features and others give us ideas of your browsing experience on this Website. This allows us to improve our Website and make your future visit to our Website as pleasant as possible.

Cookies by themselves cannot be used to discover your identity nor do they damage your computer. You can set your browser to notify you when you receive a cookie, which enables you to decide whether you would like to accept it or not.

Kindly note that should you choose not to accept cookies from our Website this may limit our Websites functionalities or performance.

### 3.2 Personal Information provided by you

Certain personal information which has been provided to us by you will also be processed, this includes but is not limited to:

- Your contact information, including your first and last name, address, email address and your telephone number;
- If you have contacted us telephonically or by email, the details of the conversation and the contact history may be recorded;
- Personal information which we reasonably need to perform our duties for purposes of marketing to you, any agreement we may have with you, or to operate your account or any CycloWorx service that you have signed up, or provide any CycloWorx product;
- Any personal information which we require to fulfil our regulatory or other business rights and obligations.

All of the above personal information is characterized by the fact that you have provided this information yourself. We use this information for the purposes described in this privacy policy. You can always have your personal information corrected or object to further processing.

### 3.3 Personal information received from third parties

CycloWorx may collect personal information about you from third parties such as fraud agencies, or Banks, in order to verify information about you. Collection from third parties will always relate to your existing relationship with us.

## 4. USE AND ANALYSIS OF YOUR PERSONAL INFORMATION

CycloWorx will only process your information insofar as it is adequate, relevant and not excessive for the purposes set out below:

- For purposes relating to your agreement or relationship with us;
- To keep you informed generally about new products or services, unless you opt out;

- Bill you according to your agreement with us, or to take the appropriate amount of credit from you;
- To administer this Website and help us improve our products or services;
- Respond to any questions or concerns you may have about using our products or services;
- Carry out research and statistical analysis including to monitor how customers use our products or services on an anonymous or personal basis;
- Prevent and detect fraud or other crimes, recover debts or trace those who owe us money;
- If you contact customer service, we will use your personal information (including your contact history) so that customer service is able to process your request and provide you with the best service possible.

## 5. SHARING YOUR PERSONAL INFORMATION

It is of utmost importance to CycloWorx that your personal information is treated with care and confidentiality and therefore CycloWorx undertakes not to sell your personal information to third parties.

We will however share your personal information with third parties as set out in this policy, if required by law or if you have consented to it. Your personal information shall be shared with the following third parties:

- Any company we use to provide a product or service on our behalf or to provide a product or service to us;
- Any payment system we may use;
- Partners or agents that conduct customer satisfaction surveys and any other surveys related to the products or services provided to you;
- Where applicable, credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies;
- Law enforcement agencies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- We'll release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers;
- If we go through a corporate re-structure or we are sold to another organisation, we may transfer any personal information we hold about you to that organisation.

## 6. KEEPING YOUR PERSONAL INFORMATION SECURE

We are committed to implementing leading data security safeguards.

Where we use service providers who are working on behalf of CycloWorx, these third parties are granted access to the personal information they require in order to carry out the particular service. The service providers are contractually obliged to treat all personal information in the strictest confidence. It is also contractually forbidden for them to use the personal information in any other

way than required. The necessary steps are taken to ensure that our service providers protect the confidentiality of your personal information.

We will also share your personal information with employees who need access to it in order to fulfil their employment duties. The same principles that apply to service providers will also apply to employees.

Should you choose to disclose your information on social plug-ins such as Google, Facebook, Twitter and Pinterest or use third-party services that allow you to post reviews or other information publicly, it is imperative to note that such third party could use that information. As such, you should ensure that you are familiar with the terms of use, privacy and cookie policies of such social plug-ins.

## 7. RETENTION OF PERSONAL INFORMATION

CycloWorx will retain your personal information for no longer than is necessary for the purposes stated in this Policy, unless the retention of your personal information is required or authorised by law or if you have consented to the retention of your personal information.

## 8. HOW TO UNSUBSCRIBE OR OPT-OUT

If you no longer wish to receive marketing messages from us, please contact our customer services team and you'll be 'opted out'.

## 9. ACCESS AND CORRECTIONS TO PERSONAL INFORMATION

Under the law, you have the right to access, correct, amend, delete your personal information or to object to the processing of your personal information.

Upon receipt of your written request and enough information to permit us to identify your personal information, we will disclose to you the personal information we hold about you.

We will also correct, amend or delete any personal information that you tell us is inaccurate and notify any third party recipients of the necessary changes.

Requests to delete personal information are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

## 10. UNAUTHORISED THIRD PARTY ACCESS TO YOUR INFORMATION

Regardless of the security measures CycloWorx has in place to protect your personal information, such as firewalls and encryption methods, you acknowledge that it may be accessed by an unauthorised third party, for an example as a result of an illegal activity. As such, CycloWorx cannot be held liable for any access to your personal information by an unauthorised third party.

## 11. GOVERNING LAW

The laws of South Africa will govern any dispute or claim arising out of or relating to your use of this Website.

## 12. COMPLAINTS

Should you believe that CycloWorx has utilised your personal information contrary to applicable law, you undertake to first attempt to resolve any concerns directly with CycloWorx.

If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator, who is empowered to monitor and enforce compliance by public and private bodies within the provisions of the Promotion of Access to Information Act, 2 of 2000, and the Protection of Personal Information Act, 4 of 2013.

## 13. NOTIFICATION OF CHANGES TO PRIVACY POLICY

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing products and services. Due to these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices do change, we will update this Privacy Policy to describe our new practices. Should such Privacy Policy be updated, we will notify you of such change. We also encourage you to check our Website regularly for any such changes.