

iPulse Systems & IQSuite.cloud
Personal Data Privacy Policy

About the Privacy Policy

We respect your privacy, and we are committed to protecting the privacy of the users the **IQSuite.cloud** Windows application, web-based application and/or mobile application product range including but not limited to **IQSuite.cloud, EnrolIQ.cloud, ClockIQ.cloud, TenantIQ.cloud, VisitorIQ.cloud, GuestIQ.cloud, ReportIQ.cloud and DashboardIQ.cloud**.

A summary of the type of information that is collected when you use **IQSuite** and how this information will be used is set out in this Privacy Policy. We seek to employ best practice when it comes to the collection and processing of personal information. It is important that you take all necessary and appropriate steps to protect your data yourself, for example, by ensuring that all passwords and access codes are kept secure. If you follow a link to any other website or use any other application, please check their policies before you submit any personal information to those websites/applications.

This Privacy Policy is effective from 1 May 2020 onwards and governs both the online and offline access to and use of the Application and related services for new and existing users, as it relates to the intellectual property rights owner of **IQSuite** (the "Licensor"); **IQSuite**'s content suppliers; and **iPulse Systems (Proprietary) Limited**, registration number **2009/023286/07** (collectively known as "The Companies").

Your Consent and Agreement

BY USING THE APPLICATION AND RELATED SERVICES:

- **YOU CONSENT TO THE COLLECTION, STORAGE, USE AND TRANSFER OF YOUR PERSONAL INFORMATION, WHICH INCLUDES IF APPLICABLE YOUR BIOMETRIC DATA, BY THE COMPANIES FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY; AND**
- **YOU FURTHER AGREE THAT YOU HAVE READ, UNDERSTOOD AND ACCEPT THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND THE TERMS OF USE ASSOCIATED WITH THE USE OF IQSUITE, AS WELL AS OUR PROMOTION TO ACCESS TO INFORMATION POLICY.**

We reserve the right to change our Privacy Policy as necessity dictates. Continued use of the Application and related services implies acceptance of this Privacy Policy, our Terms of Use, and our Promotion of Access to Information Policy, as updated from time to time.

All disputes over privacy and your data shall be governed as set out in this Privacy Policy, our Terms of Use, and our Promotion of Access to Information Policy.

What is personal information?

Personal information is information which identifies you as an individual, and includes:

- your biometric information;
- your name if it appears with your other personal information or if your name itself would reveal information about you;
- information relating to your 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;
- information relating to your education or medical, financial, criminal or employment history;
- any identifying number symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to you;
- your private or confidential correspondence (including correspondence that can reveal your original private or confidential correspondence);
- the views or opinions of another individual about you;
- any other information defined as "Personal Information" in terms of the Protection of Personal Information Act 4 of 2013 (**"POPI"**); and
- any other information included under "personal data" and "special categories of personal data" in terms of the General Data Protection Regulation 2016/679 (**"GDPR"**).

Information collected

The Companies may collect your personal information through your access and use of **IQSuite**, during conversations or correspondence with The Companies' representatives, or when you use the services and/or purchase goods and/or complete an online application form.

The Companies may collect, store, and transfer personal information from you in connection with and for the following purposes:

- Know Your Customer (KYC) requirements;
- Anti-Money Laundering and/or Counter Terrorism Financing Legislation, Rules and Regulations, as relevant to your country;
- Financial Intelligence Centre Act 38 of 2001 legislation, as amended (FICA); • Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 legislation, as amended (RICA);
- The provision of any product or service that The Companies and/or our affiliates may offer now or in the future;
- Orders, activations, and registrations for any products or services;
- Creation of a user profile on **IQSuite** and verification of such profile;
- Information requests or complaints;
- Employment applications;
- Registration for events; and
- Visits or browsing on The Companies' websites

The Companies may collect, store, and transfer the following types of personal information, including, but not limited to:

- Personal and business contact information, such as name, address, telephone number, and email address;
- Biometric information, including but not limited to facial, fingerprint and voice;
- All information and documentation required in terms of Anti-Money Laundering and/or Counter Terrorism Financing Legislation, Rules and Regulations, as relevant to your country;
- All information and documentation required in terms of FICA;
- All information and documentation required in terms of RICA;
- All information and documentation required in terms of other legal and/or business requirements relating to KYC;
- Other unique information such as user IDs and passwords, product functionality, product and service preferences, contact preferences, educational and employment history;
- Any information necessary for us to provide the services you have requested;
- Geo-location information such as your IP address or physical location;

- Details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- Any additional information relating to you that you provide to us directly through **IQSuite** or indirectly through use of **IQSuite**, offline or online, through our representatives or otherwise; and
- Information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

The Companies will store your personal information electronically. By registering on **IQSuite**, you also expressly consent to allow The Companies to collect information about your computer or phone/ mobile device, including where available your IP address, operating system, and browser type, for system administration and to report aggregate information to our webmasters. This information reveals nothing personal about you. It is statistical data about our users' browsing actions and patterns which does not identify any individual and allows us to ensure that content from our site is presented in the most effective manner for you and for your computer.

BY SUPPLYING YOUR PERSONAL INFORMATION AND USING THE APPLICATION AND RELATED SERVICES, YOU CONSENT TO THE COLLECTION, STORAGE, USE AND TRANSFER OF YOUR PERSONAL INFORMATION, WHICH INCLUDES YOUR BIOMETRIC DATA, BY THE COMPANIES.

How the information collected is used

Personal information provided to The Companies by you will only be used for the purposes it was provided as well as for the purposes listed in this Privacy Policy. Considering the nature of the services we offer; we may share your information to our third-party service providers to provide our services to you. In the provision of the services, we may also allow other users to access your personal information, provided you have agreed to any such user being granted access. Personal information will not be sold to third parties or provided to direct marketing companies or other such organisations without your permission. We may disclose your personal information to third parties if we are under a duty to disclose or share such information to comply with any legal obligation or to protect the rights, property or safety of The Companies, its clients, or others.

The Companies may use your information to:

- To carry out our obligations arising from any contracts entered between you and us;
- Provide the services and/or products to you, which may necessitate sharing your personal information with third party service providers located in South Africa as well as outside of South Africa;
- Provide third parties with your KYC formation and documentation for the purposes of validating and verifying your identity and residence (or place of business);
- Manage our relationship with you and the service providers;
- Provide you with access to protected areas of our website and other applications;
- Communicate with you about The Companies' products, services, or support as well as that of our affiliates and service providers and send marketing communications in connection therewith;
- Provide support to you in respect of the products or services;
- Improve our products and services and develop new products and services;
- Provide personalised promotional offers;
- To allow you to participate in interactive features of our service;
- Allow you to participate in contests and surveys;
- Answer enquiries, provide information, support or advice about existing and new products or services;
- Assess and improve the performance and operation of **IQSuite**;
- To keep your contact details up to date and provide updated details to The Companies' service providers and suppliers where necessary;
- Prevent and detect security threats, fraud, or other malicious activity; and
- To process and respond to any complaint made by you.

If you are asked to provide your credit card information, such credit card information is used only for payment processing and fraud prevention. This information is not used for any other purpose by us or our financial services providers and will not be kept longer than necessary for providing the services unless you ask us to retain your credit card information for future purchases.

Demographical and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of **IQSuite**. Any disclosure of this information will be in aggregate form and will not identify individual users.

If you subscribe for data, news, announcements, alerts or any such information to be emailed to you from The Companies, we will hold your details on our database until such time as you chose to unsubscribe from this service. You may do this at any stage by selecting the appropriate option in the alerts section of this site.

Transfer of your personal information to other countries

Considering the use of cloud service providers and cloud-based technology in **IQSuite**, the personal information which we collect from you will be transferred to and stored on a cloud server located in South Africa. It may also be processed by staff operating outside your country who work for The Companies or for one of our affiliates, partners, or associates.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, which includes hosting on secure servers, encryption of transactions and password protection. Where we have given you (or where you have chosen) a password which enables you to access certain parts of **IQSuite**, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

BY SUPPLYING YOUR PERSONAL INFORMATION, AND USING IQSUITE AND RELATED SERVICES, YOU CONSENT TO THE COLLECTION, STORAGE, USE AND TRANSFER OF YOUR PERSONAL INFORMATION, WHICH INCLUDES YOUR BIOMETRIC DATA, BY THE COMPANIES TO AND IN ANOTHER COUNTRY.

Storing of personal information

We will only retain your personal information for as long as is necessary. We undertake to delete those components of your personal information which we no longer require for legal record keeping. We will keep your personal information for only so long as we need it to:

- honour your choices;
- fulfil the purposes described in this document; or
- as required or permitted by applicable laws and regulations.

Protection of your personal information

We implement generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration, or destruction. Unfortunately, the transmission of information via the internet is not always completely secure. Please be advised, therefore, that we cannot fully eliminate security risks associated with the storage and transmission of personal information and any submission of personal information is at your own risk.

Links to other applications and websites: please note that this Privacy Policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. Our services may provide a link or otherwise provide access to third party sites. We provide these links merely for your convenience. We have no control over, do not review, and are not responsible for third party sites, their content, or any goods or services available through the third-party sites. Our Privacy Policy does not apply to third-party sites, and any data you provide to third-party sites, you provide at your own risk. We encourage you to review the privacy policies of any third-party sites with that you interact with.

Compliance with the Children's Online Privacy Protection Act

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), and we therefore do not knowingly collect any information from anyone under 16 years of age. Our website, products and services are all directed to people who are at least 16 years old or older.

For purposes of GDPR and POPI, note that the minimum age (18 in South Africa, and between 13 and 16 in certain European Union Member States) and definition of a "child" may vary based on country/region and on local law. If you become aware that a "child" has provided The Companies with personal information without parental consent, please contact our Data Protection Officer immediately at **legal@ipulse.systems**. If we become aware that a child has provided us with personal information without parental consent, we will take steps to remove the data and cancel the child's account.

Your rights in relation to your personal information

You may have certain rights under your local law (GDPR, POPI, Promotion of Access to Information Act) in relation to the personal information we hold about you. You may have a legal right to:

- Obtain confirmation as to whether we process personal information about you, receive a copy of your personal information and obtain certain other information about how and why we process your personal information;
- The right to withdraw consent:
  - Where we process personal information based on consent, individuals have a right to withdraw consent at any time, unless the personal information is processed to fulfil legal requirements.
- The right to request for your personal information to be updated, amended, or rectified where it is inaccurate (for example, if you change your address) and to have incomplete personal information completed;
- The right to delete your personal information in the following cases:
  - The personal information is no longer necessary in relation to the purposes for which they were collected and processed;
  - Our legal ground for processing is consent, you withdraw consent, and we have no other lawful basis for the processing;
  - Our legal ground for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to the processing and we do not have overriding legitimate grounds;
  - Your personal information has been unlawfully processed; or
  - Your personal information must be erased to comply with a legal obligation to which we are subject.
- The right to restrict personal data processing in the following cases:
  - For a period enabling us to verify the accuracy of personal information where you contested the accuracy of the personal information;
  - Your personal information has been unlawfully processed and you request restriction of processing instead of deletion;
  - Your personal information is no longer necessary in relation to the purposes for which they were collected and processed but the personal information is required by you to establish, exercise, or defend legal claims; or
  - For a period enabling us to verify whether the legitimate grounds relied on by us override your interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.
- The right to object to the processing of your personal information in the following cases:
  - Our legal ground for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or
  - Our processing is for direct marketing purposes.
- The right to data portability:
  - The right to receive your personal information provided by you to us and the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal information is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.

You can exercise your rights at any time by contacting our Data Protection Officer at **legal@ipulse.systems**. We will respond to your request within 30 days.

Use of cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Our web applications and mobile applications use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

Some cookies we use are from third party companies, such as Google Analytics, to provide us with web analytics and intelligence about our sites. These companies use programming code to collect information about your interaction with our sites, such as the pages you visit, the links you click on and how long you are on our sites. This code is only active while you are on **IQSuite**. For more information on how these companies collect and use information on our behalf, please refer to their privacy policies: Google at Google Privacy & Terms.

By using **IQSuite** you agree that we can place cookies on your device as explained above. If you want to remove existing cookies from your device, you can do this using your browser options. If you want to block future cookies being placed on your device, you can change your browser settings to do this. Please bear in mind that deleting and blocking cookies will have an impact on your user experience as parts of the site may no longer work. Unless you have adjusted your browser settings to block cookies, our system will issue cookies as soon as you visit our site or click on a link in a targeted email that we have sent you, even if you have previously deleted our cookies.

Applicable Law

This Privacy Policy will be governed by the laws of the Republic of South Africa. You consent to the jurisdiction of the South African Courts for any dispute which may arise out of this Privacy Policy.

Changes to our Privacy Policy

If we decide to change our Privacy Policy, we will include those changes in the Application.

Disclosures required in terms of section 43 of the Electronic Communications and Transactions Act 25 of 2002

Full company name:	iPulse Systems (Proprietary) Limited
Registration number:	2009/023286/07
Country of incorporation:	South Africa
Physical address:	Unit 19, Yacht Club Office Park, 2 Dockrail Road, Foreshore, Cape Town, South Africa
Telephone number:	+27 (860) 478-573
Website URL:	www.ipulse.systems
Email address:	legal@ipulse.systems

Data Protection Questions

If you have any questions regarding this Privacy Policy, you may contact our **Data Protection Officer** at the following email address: **legal@ipulse.systems**

Related Documents

This document should be read in conjunction with the iPulse Promotion of Access to Information Policy and the iPulse Terms & Conditions of Use.