

*****EXTERNAL POLICY DOCUMENT*****

[TO BE TRANSPOSED ON THE NLIGHTEN WEBSITE]

NLIGHTEN [DATA PROTECTION] PRIVACY POLICY/STATEMENT

1 INTRODUCTION

- 1.1 Nlighten Customer Service Improvement Co Proprietary Limited with registration number 2005/007595/07 ('we', 'us', 'our', 'Nlighten') is a company that offers a top-class customer and client experience in building businesses with a specific focus on novelty and purpose.
- 1.2 Our business model is premised on capitalising on people, any organisation's most vital asset. Thus our success is derived from the impetus, empowerment and innovation that we pro-actively create and implement as robust customer experience strategies to afford any organisation a stellar reputation with its customers and a loyalty to inspire a continuous relationship and continuous sales.
- 1.3 We value our clients and business partners. We understand the importance of protecting personal information. It is for this reason that the protection of your personal information is a priority. We endeavour to maintain the confidentiality of your personal information and process your personal information in compliance with Data Protection Legislation.¹
- 1.4 This privacy policy ("**Privacy Policy**") explains how we collect, use, transfer and protect your personal information. This notice may be revised from time to time as and when necessitated by the changes in our growing business. **Kindly take note that Nlighten may review and update this Privacy Policy from time to time and such Privacy Policy will be made available on our website.**

2 WHAT IS PERSONAL INFORMATION

¹ **Data Protection Legislation** – This refers to the Protection of Personal Information Act 4 of 2013 ("**POPIA**") and in line with the principles and obligations as set out in the EU General Regulation on Data Protection 2016/679 ("**GDPR**").

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- 2.1 In terms Data Protection Legislation, personal information is information that may be used to identify an individual or, as applicable, a company.
- 2.2 Examples of personal information include, but are not limited to –
 - 2.2.1 name;
 - 2.2.2 identification number;
 - 2.2.3 contact information;
 - 2.2.4 financial information;
 - 2.2.5 information relating to race, gender or sexual orientation;
 - 2.2.6 age;
 - 2.2.7 physical or mental health;
 - 2.2.8 disability; and
 - 2.2.9 language.

3 OUR LEGAL BASIS FOR COLLECTING AND PROCESSING PERSONAL DATA/INFORMATION

- 3.1 We process personal data based on the following three pillars to ensure that the necessary legal basis for processing information is in place –
 - 3.1.1 **Consent** – which you are free to give or refuse. Consent options will be available when you visit our website for the first time. You can change your decisions at any time. We only have access to and process information that you voluntarily give us via email or other direct contact from you. If you change your decision it will not affect or impact on the lawfulness of the processing of your personal data based on consent before your withdrawal. We are the sole owners of the information that we collect on our website.
 - 3.1.2 **Contract** – we use personal information for the purpose of satisfying our obligations related to contracts and agreements that we enter into with our clients and business partners.

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3.1.3 **Legitimate Interest** – we may use personal information if such personal information is considered to be of a legitimate interest, and if correspondingly, the privacy rights of our clients and business partners do not override this interest. In order for us to establish the legal basis for which information is collected, an assessment will be made during which a mutual interest between us and the individual identified has been confirmed. This legal basis is predominantly related to our services, and we may send information regarding these services to our clients and business partners based on legitimate interest.

3.2 Nlighten requires its clients to take note of the above to ensure that the required legal basis for processing personal information is firmly in place.

3.3 Furthermore, Nlighten will always inform its clients and business partners about their privacy rights and the purpose for which we collect personal information.

4 PURPOSE FOR COLLECTION AND PROCESSING OF PERSONAL DATA/INFORMATION

Nlighten works hard to find and introduce new clients to our services as well as improve the quality of our website. We want to ensure that we communicate this clearly with you and directly with anyone who visits our website. In order to do this we need to collect and process data. We have broken down the purpose and reasons in the table below to present to you, practically, the data that will be gathered by our tools –

NAME OF PURPOSE	REASON
Identification and contact information	✓ building a relationship with you ✓ provide training for you and your team which is crucial to building customer loyalty and strategy
Analytics	✓ improving site user interface
Telephone recordings	✓ offer our services i.e. conducting surveys

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NAME OF PURPOSE	REASON
	<ul style="list-style-type: none"> ✓ research purposes and understanding your business goals and what you want your customers to take away from their experience with your business
Information that will assist us to provide products and services to you	<ul style="list-style-type: none"> ✓ to provide you with a tailor made service specific to your company's needs in order to better your customer service and manage your customer expectations
Information regarding marketing preferences	<ul style="list-style-type: none"> ✓ sending marketing materials relevant to your particular interests

5 TYPES OF PERSONAL DATA/INFORMATION THAT WE COLLECT AND PROCESS

5.1 Please note that we may collect personal information which includes, but is not limited to the below –

NAME OF PURPOSE	PERSONAL DATA USED
Identification and contact information	<ul style="list-style-type: none"> ✓ first name and surname ✓ email address ✓ telephone number/s ✓ physical address, state, province, city, ZIP/Postal code
Analytics	<ul style="list-style-type: none"> ✓ behaviour on our website ✓ device information ✓ IP address
Telephone recordings	<ul style="list-style-type: none"> ✓ recordings of telephone calls between you and our representatives or call centres

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NAME OF PURPOSE	PERSONAL DATA USED
Information that will assist us to provide products and services to you	<ul style="list-style-type: none">✓ location✓ details of your business objectives and products/services that you provide
Other sensitive information	<ul style="list-style-type: none">✓ sensitive information voluntarily provided by you
Information regarding marketing preferences	<ul style="list-style-type: none">✓ browser cookies✓ behaviour on our website✓ IP address✓ preferred method to contact you

6 HOW LONG WE STORE PERSONAL INFORMATION

6.1 Our Website

6.1.1 Nlighten stores your personal information for as long as we find it necessary to fulfill the purpose for which we collected your personal information in addition to taking into consideration our need to answer your queries or resolve any potential difficulties in order to comply with the legal requirements under Data Protection Legislation, to attend to any legal complaints and/or claims as well as for safeguarding purposes.

6.1.2 Essentially, we may retain personal information for a reasonable period of time subsequent to your last interaction with us. When the personal information that we have collected is no longer of use and required, we will remove and delete the personal information in a secure manner.

6.1.3 It is important to take note that we may process personal information for statistical purposes, however in these instances, such personal information will be anonymised.

6.2 Our Services

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- 6.2.1 We collect and use personal information you provide to Nlighten only for the purposes of assisting you to create a robust and detailed plan of how to best serve your customers. Information that we collect and process throughout our working relationship with you is used only for communication with you and the team that makes up your business and to evaluate where your business needs to grow in terms of a quality customer experience.
- 6.2.2 We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.
- 6.2.3 We may also retain your personal information to the extent and duration that we have a legitimate interest to process your personal information depending on, amongst others, the nature and lifespan of the service that we provide to you.
- 6.3 We will upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged to retain.

7 TRANSFER OF INFORMATION

- 7.1 Nlighten will transfer personal information to a third country in terms of applicable Data Protection Legislation. Where we transfer personal information outside of the Republic of South Africa ("**RSA**") –
- 7.1.1 we will ensure that the third party who is the recipient of the personal information is subject to data protection legislation that affords a similar and adequate level of protection; or
- 7.1.2 we will obtain consent, where such consent is required; or
- 7.1.3 we will do so where the transfer of personal information is required for the conclusion and/or performance of a contract between Nlighten and you.

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7.2 Where our services require that we conduct a survey outside the borders of the RSA in a third country, it remains your obligation and duty to ensure that the data subject's consent to the transfer of personal information to the RSA has been granted, should consent not be required, that a legitimate basis exists for such transfer and approval has been granted by the third country regulator (if required) for such transfer from the third country.

7.3 It must also be noted that Nlighten may transfer your personal information, to the extent applicable, in the event of a change in business ownership, such as by merger, acquisition, or other proceeding involving the transfer, sale, or divestment of business assets . Nlighten's failure to do so may result in –

7.3.1 the violation of Data Protection Legislation;

7.3.2 diminished value of the information; and

7.3.3 legal disputes.

8 SHARING INFORMATION WITH THIRD PARTIES

8.1 Our Website

8.1.1 We will not sell personal information to anyone. We will use your information to respond to you, regarding the reason for which you contacted us. We will not share your information with any third party outside of our organisation, other than as necessary to fulfil your request. Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this Privacy Policy.

8.2 Our Services

8.2.1 We will not share, sell or trade personal information to any third parties without your consent, except for **third-party service providers who work on our behalf**. We may pass your information on to our business partners with the purpose of providing services to you and on our behalf.

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8.2.2 We will only disclose your personal information if we are required to do so by law or if we, as a company, reasonably believe that disclosure of your personal information is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, Nlighten will take all the necessary steps to ensure that your privacy rights continue to be protected.

8.2.3 Unless you ask us not to, we may contact you via email in the future to tell you about specials, new services, or changes to this Privacy Policy.

9 HOW WE USE THE PERSONAL INFORMATION

Nlighten uses the collected personal data for various purposes such as –

- 9.1 to provide you with services;
- 9.2 to notify you about changes to our services and/or our products;
- 9.3 to provide you with customer support;
- 9.4 to gather analysis or valuable information from so that we may improve our services; and
- 9.5 to detect, address and prevent any technical issues that may arise.

10 YOUR RIGHTS AS A DATA SUBJECT

10.1 As a data subject, you have a number of data privacy rights. These rights include the right to request from Nlighten access to, correction or deletion of your personal data or restriction of processing concerning your data or to object to the processing of your personal information.

10.2 In addition to the above you have the following rights –

- 10.2.1 the right to be informed;
- 10.2.2 the right of access;

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- 10.2.3 the right to rectification;
- 10.2.4 the right to erasure;
- 10.2.5 the right to restrict processing;
- 10.2.6 the right to information portability;
- 10.2.7 the right to withdraw;
- 10.2.8 the right to object.

11 SECURITY

- 11.1 We take precautions to protect your information that we collect and process. When you submit information via our website, your information is protected both online and offline. We use encryption to protect information that is transmitted online and are equally security conscious in relation to protecting your information offline and how this information is handled and stored offline.
- 11.2 Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to your information. The computers/servers in which we store your information are kept in a secure environment.
- 11.3 Our data protection/information officer is responsible for ensuring that Nlighten is fully compliant with Data Protection Legislation and that the laws and the provisions of our own policy are understood and implemented consistently and effectively by all those with data handling responsibilities.

12 CONTACT US

If you have any complaints, concerns or questions regarding –

- 12.1 personal data/information and how we treat your personal data/information;

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- 12.2 our policy;
- 12.3 making a complaint in relation to how we have processed your personal data/information; or
- 12.4 how to exercise your rights as a data subject

please address your complaint, concern or question to our Information Officer –

Name: Farah Viviers

Postal Address: Nlighten Customer Service Improvement Co Proprietary Limited
Postnet Suite 183
Private Bag X16
Constantia
7848

E-mail address: farah@nlighten.co.za / informationofficer@nlighten.co.za

Telephone number: +27 21 794 7533