# Spark! Website www.spark-sme-services.co.za Privacy Policy

THIS PRIVACY POLICY FORMS PART OF OUR WEBSITE TERMS AND CONDITIONS OF USE. IF YOU DO NOT AGREE WITH ANY TERM OF THIS PRIVACY POLICY, YOU MUST CEASE YOUR ACCESS OF THIS WEBSITE IMMEDIATELY.

#### 1. Definitions

The following words and phrases have these meanings in this document:

- 1.1. "Personal Information" is as defined in POPI.
- 1.2. "POPI" means the Protection of Personal Information Act currently in force in the Republic of South Africa.
- 1.3. "Process" in relation to Personal Information means to collect, organize, store, modify, retrieve, refer to, distribute, or erase, or otherwise as defined in POPI.
- 1.4. "Site" means Internet World Wide website at URL www.spark-sme-services.co.za.
- 1.5. "You" or the "user" means any person who accesses this Site for any purpose.

#### 2. Status and Amendments

- 2.1. We respect and recognize the importance of protecting your privacy. This privacy policy statement sets out our information gathering and dissemination practices in respect of the Site.
- 2.2. This Privacy Policy forms part of the Terms and Conditions of Use of this Site. If you do not agree with this Policy then you may not use this Site and are required to cease doing so immediately.
- 2.3. We reserve the right to amend the terms and conditions of this Privacy Policy at any time without notice. It is your duty to be aware of the current version of this Privacy Policy. Please refer to the last revision number and date at the top of this document. Continued use of the Site subsequent to any amendments having been effected constitutes your acceptance of the Privacy Policy as amended.

## 3. Collection and Processing of Personal Information

3.1. Where you submit Personal Information via the Site the following principles are observed in the handling of that information:

- 3.1.1. We will only collect Personal Information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
- 3.1.2. We will only Process Personal Information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.
- 3.1.3. Personal Information will only be processed for a purpose compatible with that for which it was collected, unless you have consented to an alternative purpose in writing or we are permitted by POPI or in terms of national legislation of general application.
- 3.1.4. We will not disclose any Personal Information relating to you to any third party unless your prior written agreement is obtained or we are required to do so by law. In this regard your attention is drawn to the Terms and Conditions for Learners.
- 3.1.5. We will destroy or delete any Personal Information that is no longer needed by us for the purpose it was initially collected, or subsequently processed.
- 3.2. Note that, as permitted by POPI, we may use Personal Information collected to compile profiles for statistical purposes. No information contained in the profiles or statistics will be able to be linked to any specific user.

## 4. Collection of anonymous data

- 4.1. We may use standard technology to collect information about the use of this Site, as per the standard Google Adwords methodology.
- 4.2. Cookies by themselves will not be used to personally identify users but we may use them to compile de-identified statistics relating to use of services offered or to provide us with feedback on the performance of this Site.
- 4.3. The following classes of information may be collected in respect of users:
- 4.3.1. The browser software used;
- 4.3.2. IP address;
- 4.3.3. Date and time of activities while visiting the Site;
- 4.3.4. URLs of internal pages visited; and
- 4.3.5. Referring websites, search engines and the like.
- 4.3. If you do not wish cookies to be employed to customise your interaction with this Site it is possible to alter the manner in which your browser handles cookies. Please note that, if this is done, certain services on this Site may not be available.

# **5. Security**

5.1. We will take appropriate, reasonable technical and organizational measures as required by applicable law to protect the information submitted to or collected by this Site from loss, misuse, unauthorized disclosure, alteration or destruction.

#### 6. Links to other Websites

6.1. We have no control over and accept no responsibility for the privacy practices of any third party websites to which hyperlinks may have been provided and we strongly recommend that you review the privacy policy of any website you visit before using it further.

# 7. Queries

7.1. If you have any queries about this Privacy Policy please contact us by emailing admin@spark-sme-services.co.za.