



PRIVACY POLICY

(This policy will appear in a Notice format on the website.)

1. INTRODUCTION

- 1.1 This Policy sets out the responsibilities and obligations of all persons who make use of, or access or receive information and communications via its electronic communication facilities and resources including its website, email and social media platforms and how all users of these facilities and resources are to ensure that when using these resources that they respect and process another's Personal Information lawfully and in accordance with the provisions of the law.
- 1.2 In terms of the Protection of Personal Information Act, 4 of 2013 (POPIA) everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one's Personal Information.
- 1.3 In order to give effect to this right, iR Worx is under a duty to provide any person whose Personal Information is processed by it, (known as a "Data Subject") with a number of details pertaining to the use of and subsequent processing of the Data Subject's Personal Information, before such Personal Information may be used or processed by iR Worx.
- 1.4 Whilst iR Worx is committed to protecting all person's rights to privacy and who in consequence will ensure that Personal Information is used appropriately, transparently and according to applicable law, iR Worx has to ensure that these rights to privacy are balanced with other rights such as the right to use and have access to iR Worx's information and services including its online and social media platforms and applications.

2. KEY DEFINITIONS

Key definitions in this document:

2.1 **"confidential information"** shall include:

- 2.1.1 all information that iR Worx has an interest or obligation to keep confidential by law, contract or otherwise; and
- 2.1.2 secret knowledge, trade secrets, intellectual property, know-how, processes and techniques, technical detail, method of operating, cost and source of material, pricing and purchasing policies and other matters which relate to iR Worx's business in respect of which information is not readily available in the ordinary course of business to a competitor of iR Worx;
- 2.1.3 personal information;

2.2 **"data subject"** means the person to whom personal information relates;

2.3 **"electronic communication"** means any communication of information by electronic means;

2.4 **"electronic communications systems"** means all systems used by iR Worx that enable electronic communications, including (without limitation) the Internet, voice mail, electronic mail and facsimiles;

2.5 **"employee"** means a part- or fulltime employee of iR Worx, including any contractor with access to iR Worx information systems;

2.6 **"information"** means representations of information in any form generated, sent, received or stored and includes:

- 2.6.1 voice, where the voice is used in an automated transaction; and
- 2.6.2 a stored record;

2.7 **"information system"** means a system for generating, sending, receiving, storing, displaying or otherwise processing data messages and includes electronic communications systems;

- 2.8 **“intellectual property”** shall include all copyright, rights in business names, trademarks, trade names, service marks, patents, designs and/or inventions, as well as all rights to source codes, trade secrets, and all other rights of a similar character (regardless of whether such rights are registered and/or capable of registration) and all applications and rights to apply for protection of any of the same;
- 2.9 **“interconnect”** means to link two telecommunications systems so that users of either system may communicate with users of, or utilise services provided by means of, the other system or any other telecommunication system
- 2.10 **“operator”** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;
- 2.11 **“owner”** means, in respect of information, the person nominated as custodian of such information in terms of this policy, being the CEO;
- 2.12 **“personal information”** has the meaning given to it in POPIA, being information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- 2.12.1 information relating to the 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 of the person;
 - 2.12.2 information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.12.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.12.4 the biometric information of the person;
 - 2.12.5 the personal opinions, views or preferences of the person;
 - 2.12.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 2.12.7 the views or opinions of another individual about the person; and
 - 2.12.8 the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
- 2.13 **“processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
- 2.13.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.13.2 dissemination by means of transmission, distribution or making available in any other form; or
 - 2.13.3 merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 2.14 **“records coordinator”** means the person nominated by board of directors as such from time to time, being the ISO; and
- 2.15 **“responsible party”** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;
- 2.16 **“sensitive information”** means information designated as “internal use only”, “confidential”, or “secret” in terms of this policy.

3. APPLICATION

The Privacy Policy and website statement are applicable to:

- 3.1 All iR Worx electronic platforms and facilities, including social media, websites and / or email, whether owned by, established by, used by, hosted by and / or accessed by iR Worx, and
- 3.2 All and any Data Subject(s), who may access and make use of the aforementioned electronic platforms and facilities, including, without detracting from the generality thereof, employees, students, clients and suppliers.
- 3.3 All the Personal Information which is owned by iR Worx and which is provided to any responsible parties and / or operators as a result of such person accessing or making use of the social media and electronic platforms.

4. ACCOUNTABILITY

- 4.1 iR Worx takes the privacy and protection of a Data Subject’s Personal Information very seriously and will only process a Data Subject’s Personal Information in accordance with POPIA and the terms of this Privacy Policy.

- 4.2 In turn where iR Worx provides any of its Personal Information to a Responsible Party or Operator, then such person will be required as a condition of receiving such information, to process such Personal Information in accordance with POPIA and the terms of this Privacy Policy.
- 4.3 Accordingly, the relevant data privacy principles relating to the processing of Personal Information, whether that belonging to iR Worx or that belonging to data subject (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will apply without exception, save where POPIA provides for such an exception, to all and any Personal Information provided by iR Worx to another or received by iR Worx as a result of the use of iR Worx's electronic platforms and facilities.

5. CONSENT TO PROCESS

- 5.1 Data subjects must be informed that they acknowledge and agree to processing of information when they access or use the iR Worx electronic platforms and facilities including all websites and URL's, any sites housed under its domain names and or social media platforms, and / or when sending or receiving emails using the iR Worx email.
- 5.2 The data subject agrees to the below:
- i. Acknowledgement to have read and understood this Privacy Policy and Website Statement and related provisions;
 - ii. Agreement to be bound by this Policy and Statement;
 - iii. Agreement to comply with this Policy and Statement; and
 - iv. Consent to process and further process the required Personal Information for the required purpose, in accordance with this Privacy Policy.

6. RECEIPT, USE AND SHARING OF PERSONAL INFORMATION

- 6.1 iR Worx will receive Personal Information pertaining to a Data Subject when the Data Subject applies, query or request via iR Worx's electronic platforms or facilities, including via its website, application or by way of email, telephone or via social media.
- 6.2 On receipt of the application, request or query, iR Worx will thereafter use and process the Data Subject's Personal Information for the purpose of the query and for a variety of related purposes, which will all depend on the application, query or request, and which without detracting from the generality thereof may include for purposes of:
- 6.2.1 identifying and / or verifying the Data Subject's details;
 - 6.2.2 providing information, products and / or services or details in connection therewith or pertaining thereto, that the Data Subject, may have requested;
 - 6.2.3 trade application and / or purchasing;
 - 6.2.4 managing any information pertaining to the Data Subject;
 - 6.2.5 further processing or general administration purposes;
 - 6.2.6 legal or contractual purposes;
 - 6.2.7 improving iR Worx's quality of its products and services;
 - 6.2.8 detecting and preventing fraud and money laundering;
 - 6.2.9 recovering unpaid monies and / or any other amount due to iR Worx;
 - 6.2.10 debt collection;
 - 6.2.11 research, analytical and statistical purposes including Beta Testing;
 - 6.2.12 carrying out analysis and consumer / customer profiling;
 - 6.2.13 identify other products and services which might be of interest to the Data Subjects;
 - 6.2.14 informing a Data Subject about iR Worx products and services.
- 6.3 In order to correctly handle any application, request or query, and in order to perform the purposes described above, iR Worx may from time to time share a Data Subject's Personal Information with the following parties:
- 6.3.1 employees, which will only be done on a need to know basis;
 - 6.3.2 suppliers, which will only be done on a need to know basis;
 - 6.3.3 carefully selected business partners who provide products and services which may be of benefit to a Data Subject which will only be done on a need to know basis; and
 - 6.3.4 operators such as service providers and agents who perform services on behalf of iR Worx which will only be done on a need to know basis and in terms of a Group operator agreement.

- 6.4 iR Worx does not share a Data Subject's Personal Information with any third parties who have not been described above, unless:
- 6.4.1 It is legally obliged to provide such information to another for legal or regulatory purposes;
 - 6.4.2 It is required to do so for purposes of existing or future legal proceedings;
 - 6.4.3 The onward transmission or sharing of Personal Information is necessary for the pursuance or protection of iR Worx' legitimate interests or that of the Data Subject or a third party;
 - 6.4.4 iR Worx may use in its prevention of fraud, loss, bribery or corruption activities another agent or service provider under a mandate to provide such service. This agent or service provider needs to process the Data Subject's Personal Information for the purpose of investigating and or preventing any act of fraud, loss, bribery or corruption,
Under all of the abovementioned circumstances, iR Worx will take reasonable measures to ensure that such Personal Information is only provided to the recipient, if such recipient undertakes to keep the Personal Information confidential and secure.
- 6.5 Device Permissions for Personal Data Access**
- 6.5.1 Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.
 - 6.5.2 By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.
 - 6.5.3 The exact procedure for controlling app permissions may be dependent on the User's device and software.
 - 6.5.4 Please note that the revoking of such permissions might impact the proper functioning of this Application.
 - 6.5.5 If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by this Application.
 - 6.5.5.1 *Approximate location permission (non-continuous):* Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.
 - 6.5.5.2 *Call permission:* Used for accessing a host of typical features associated with telephony.
 - 6.5.5.3 *Camera permission, without saving or recording:* Used for accessing the camera or capturing images and video from the device. This Application does not save or record the camera output.
 - 6.5.5.4 *Contacts permission:* Used for accessing contacts and profiles on the User's device, including the changing of entries.
 - 6.5.5.5 *Microphone permission:* Allows accessing and recording microphone audio from the User's device.
 - 6.5.5.6 *Phone permission:* Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the "phone state", which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.
 - 6.5.5.7 *Photo Library permission:* Allows access to the User's Photo Library.
 - 6.5.5.8 *Precise location permission (non-continuous):* Used for accessing the User's precise device location. This Application may collect, use, and share User location Data in order to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the exact position of the User on a continuous basis.
 - 6.5.5.9 *Sensors permission:* Used for accessing data from sensors that Users may use to measure what is happening inside their body, such as for instance, heart rate.
 - 6.5.5.10 *SMS permission:* Used for accessing features related to the User's messaging including the sending, receiving and reading of SMS.
- 6.6 iR Worx does not transfer Personal Information across South African Borders at this time.
- 6.7 Where iR Worx in future may need to transfer the Data Subject's Personal Information across the South African borders, it will before it does so, ensure that the recipient thereof agrees to be bound by EU Information Protection laws out in binding corporate rules or binding agreements that provide an adequate level of protection and uphold the principles for the reasonable and lawful processing of such Personal Information.

7. RECEIPT, USE AND SHARING OF iR WORX PERSONAL INFORMATION

- 7.1 iR Worx, on receipt and in response to a query or request received from a Data Subject, may transmit via its website, or by way of email, telephone or via social media, its own Personal Information, which Personal Information on receipt by the requesting or receiving party, may only be used for the purpose relating to the initiating of the request or query and for no other purpose.
- 7.2 The recipient undertakes that it will not use this Personal Information for any other purpose or share this information with any other party, save where it has been given express permission to do so by iR Worx.

8. INFORMATION QUALITY, OPENNESS, DATA SUBJECT PARTICIPATION

- 8.1 Whilst iR Worx will make all effort to ensure the integrity and accuracy of a Data Subject's Personal Information, this may not at all times be possible.
- 8.2 Following this, the website notice must state that the Data Subject accepts the responsibility for keeping his / her or its Personal Information up to date, and undertakes to inform iR Worx of any changes to his / her and its Personal Information.
- 8.3 A Data Subject has a right of access to any Personal Information which iR Worx holds and where applicable may request the correction of any inaccuracies in or to any such Personal Information.
- 8.4 Any access request must be done by way of a formal iR Worx Public Access to Information process. (Refer to the PAIA Manual)

9. SECURITY AND PERSONAL DATA

- 9.1 iR Worx makes all reasonable effort to keep its social media and electronic platforms including its website secure at all times, however it cannot guarantee the security of any information provided to or by iR Worx through its website, e-mail, internet or social media sites and cannot be held responsible for any loss or unauthorized use or interception of information transmitted via these social media and electronic platforms or sites, including its Internet, which is beyond reasonable control.
- 9.2 The website may contain links to other websites outside iR Worx's control and is not responsible for the content, privacy or security of these other third party-controlled websites.
- 9.3 iR Worx's website might be tracking the users' cookies as the web site / company is currently undertaking Google AdWords remarketing of any other Google AdWords feature that tracks such cookies. iR Worx shall under no circumstances be using any sensitive information of any nature on any of our remarketing tags.
- 9.4 iR Worx shall duly endeavor to adhere to all of the current in-effect policies of Google related to remarketing or any other form of Google advertising in all of its Google AdWords marketing campaigns. (In instances of possible non-conformity to such, iR Worx shall endeavor to rectify such in a prompt manner.)
- 9.5 iR Worx makes use of social plugins of social networks such as Facebook, Instagram and Twitter but has no influence on or control over the extent of the data retrieved by the social networks' interfaces. iR Worx can accordingly not be held responsible or liable for any processing or use of Personal Information transmitted via the social plugins.
- 9.6 For information on purpose and extent of the data retrieval by the social network concerned and about the rights and settings which are available to access for the protection of private information, the data subject must refer to the data protection information of the social network in question.
- 9.7 iR Worx's social media and electronic platforms including its website and telephone facilities and use of them will be monitored on a regular basis including the recordable and interception of content placed on or stored on said facilities which is done for security, integrity and quality assessment purposes. A Notice to this effect must appear on the website.
- 9.8 Subject to the provisions above, iR Worx shall implement the appropriate technical and organizational security measures which are required in order to protect all Personal Information and related data which it holds from and / or against unauthorized access, accidental or willful manipulation, loss or destruction.

10. MONITORING AND REVIEW

This policy was implemented on 3 May 2021 and shall be regularly monitored and reviewed.