



WinWin International Privacy Policy for Web

1. Introduction

- 1.1. WinWin International ('**WWI**') is a blended learning and strategic communications specialist offering traditional, digital, immersive and multimedia solutions.
- 1.2. For purposes of this policy “we”, “us”, “our” refers to WWI, and “you”, “your”, “user” refers to the data subject.
- 1.3. WWI is committed to processing all personal information lawfully, transparently, securely, and in accordance with the Protection of Personal Information Act 4 of 2013 ('**POPIA**'), the European Union’s General Data Protection Regulation 2016/679 ('**GDPR**'), and other relevant privacy legislation.
- 1.4. If you do not agree with this privacy policy, you are prohibited from using the website and must immediately refrain from doing so. Furthermore, if you do not agree with this privacy policy, or the terms of use, you should not provide any of your personal information to WWI.
- 1.5. This privacy policy sets out WWI’s approach towards the use of your personal information. By submitting your personal information to us, and/or by using the website, you will be regarded as having given your consent – where necessary and appropriate – for the processing of personal information referred to in this policy. Consequently, by continuing to use the website, you acknowledge and agree that WWI may collect, use and transfer your personal information in accordance with this policy, and applicable legislation.

2. Overview of the information we collect

- 2.1. We may from time-to-time need your personal information in order to process your job application, or to contact you in relation to any query, complaint or comment. We may also need your information to improve our service offerings, or to contact you with information

about our company – this information will be collected in accordance with this policy, and applicable legislation.

- 2.2. Furthermore, and in accordance with POPIA, we may use your personal data to carry out our obligations arising from any contract with you, to notify you about changes to our goods or to the website, to assist with business development, and in connection with any legal proceedings, or where we have a right or duty to disclose the information in terms of law or industry codes.

3. Specific information we may hold

We may, for example, collect and use the following information about you:

- Name and surname
- Email address
- Contact telephone number
- ID number
- Physical and postal address
- Education and qualifications
- Work experience and skills
- Race
- Gender
- General health
- Home language
- IP Addresses
- Location

and any other information which we reasonably need to perform our duties in pursuance to any agreement we may have with you, or to fulfil our regulatory or business obligations.

In addition, we may, from time-to-time, use third party services (such as Google Analytics) that collect, analyse and monitor log data pertaining to the website in order to optimize, improve and audit the products and services we offer.

4. Specific Information we may share

- 4.1. We will only share your information with third parties that we have trusted relationships with, and selected third parties who perform services on our behalf. All service providers are

bound by contract with us to maintain the security of your personal information and to use it only as permitted by us, in accordance with this policy and in accordance with applicable law.

5. How we use your information

5.1. We undertake to only process your information insofar it is adequate, relevant and not excessive for the purposes set out below. Further, we will only use your personal information for a purpose compatible with that for which it was collected.

5.2. We will use your information to:

- operate and manage your agreement with us or correspondence you may have with us;
- carry out, monitor and analyse our business;
- contact you via social media or by email, SMS, letter, telephone or in any other way about our products and services as allowed for in law, unless you tell us that you prefer not to receive marketing communications;
- to form a view of you as an individual and to identify, develop or improve products or services that may be of interest to you;
- carry out market research, business and statistical analysis;
- perform other administrative and operational purposes including the testing of systems;
- comply with our regulatory or other obligations;
- carry out any other reasonable business operation considering our business and the relationship between the parties.

5.3. Your information may also be used for other purposes for which you give your permission or where we are permitted to do so in law or it is in the public interest to disclose the information.

5.4. You may on reasonable grounds object to the processing of your personal information, after which we undertake not to continue to process such information, except as provided for in law.

6. Cookies and Web Beacons

- 6.1. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.
- 6.2. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website or even order goods. You may ask for a full list of the cookies we collect by sending us an email to incident@winwinza.com.
- 6.3. Our website may contain electronic image requests (sometimes referred to as "web beacon" requests) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

7. How do we store your data?

- 7.1. Information will be stored securely by WWI – we will take all reasonable security measures to ensure the integrity and confidentiality of your information.
- 7.2. Data will be stored in WWI's SQL databases which are IP and password locked and require security certificates to access.
- 7.3. The SQL databases are hosted by leading international service provider Google Cloud Compute. All databases are encrypted and secured.

8. Your Data Subject Access Rights (Access, Deletion and Correction)

- 8.1. Save as provided herein, the provision of personal information by any data subject to WWI is entirely voluntary – you may withdraw your consent at any time, or you may contact us at incident@winwinza.com to:
 - 8.1.1. enquire about what personal information we hold of yours; and/or
 - 8.1.2. request us to delete and/or correct your personal information; and/or
 - 8.1.3. object to us processing your personal information on reasonable grounds pertaining to your particular situation.

- 8.2. WWI will only retain personal information for as long as it is required to provide the services requested, and will under the instruction and authority of the Information Officer, ensure that all personal information is deleted when it is no longer required to perform the services or for archival or legal purposes.
- 8.3. Requests must be made in writing to the WWI Information Officer, and provide adequate proof of the requester's identity to the satisfaction of WWI.
- 8.4. We will confirm free of charge whether we hold any personal information about you.

9. Information Officer and Responsible Party

- 9.1. The responsible party for the implementation of this Policy is WWI and operationally the Information Officer.
- 9.2. If you have any requests, or queries regarding WWI's use of data in terms of any applicable laws, please contact the Information Officer: Sean King, incident@winwinza.com.

10. Safeguarding Personal Information and Data Breach

- 10.1. WWI will take reasonable and adequate technical and organisational measures to ensure your personal information is secure, accurate, reliable and up-to-date.
- 10.2. In the event of loss of, damage to or unauthorised destruction of any personal information held by WWI and/or a security breach that enables a third party unlawfully to access the personal information of data subjects the Information Officer will notify the necessary Regulators and the data subjects affected as soon as reasonably possible, subject to legitimate law enforcement requests to delay notice and reasonable measures to identify the data subjects affected, determine the scope of compromise data, and to restore the integrity of WWI's information systems.

11. Changes to this policy

- 11.1 We may amend this policy from time-to-time. Please check our website periodically to inform yourself of these changes.

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