



Chancellor House Holdings  
(Pty) Limited

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## PRIVACY POLICY

### 1. Audience

1.1. This policy applies to all visitors and members to our website.

### 2. Purpose of this Policy

2.1. We respect your privacy and take the protection of personal information seriously. The purpose of this policy is to describe the way we collect, store, use and protect information that can be associated with a specific natural or juristic person and can be used to identify that person ("**Personal Information**").

2.2. Personal Information:

2.2.1. Includes

- a) Certain information collected on entering competitions through Facebook comments.
- b) Optional information that you voluntarily provide to us.
- c) additional data that you provide to CHH in comments CHH Platforms, especially in forms of discussion boards and using the comment features of blogs ("**comment data**").
- d) your IP address, information about the amount of data transferred, stored in access log files ("**usage data**").
- e) first name, last name, date of birth, email address, country, job title, phone number, fax number, company name, and additional information that you provide when contacting us using our Websites, especially information provided in free text fields of contact forms ("**contact data**").



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- f) additional data that you provide to CHH while subscribing for any of CHH products and/or services etc. ("**subscription information**");
- g) email address, phone number, name, company name and country provided when subscribing to a newsletter or other marketing information of CHH ("**direct marketing data**").
- h) Personal Information sent by your web browser, i.e., information about your type of web browser, your operating system, and selected settings (e.g., language, region, font size, font types and other configuration) may be collected ("**browser data**").

#### 2.2.2. **Excludes**

- a) Information that has been made anonymous so that it does not identify a specific person;
- b) Permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- c) Non-personal statistical information collected and compiled by us and information that you have provided voluntarily in an open, public environments or forum including (without limitation) any blog, chat room, community, classifieds or discussion board. Because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy.

### 3. **Our Privacy Statement**

- 3.1. Recognition of the right to privacy including the right to protection against the unlawful collection, retention, dissemination, unauthorised distribution and use of personal information is our commitment to you as our client, visitor and/or



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user (the “user”) of our website and/or CHH Platforms. Our privacy statement is aligned to the principles of the Protection of Information Act, 2013 (Act No. 4 of 2013) (“**POPIA**”) and your referred to section 1 of the aforesaid Act, (“**Definitions**”) to appraise yourself with the meaning of all wording in capital letters or our Website Terms.

3.2. CHH in its role as ‘*responsible party*’ appreciates your visit on our website and interest in our company and our service offering. To ensure a high level of transparency and security, our privacy statement as set forth below will inform you about the nature, scope and purpose of any collection, use and processing of personal information transmitted to us via our website or recorded by us.

#### 4. **CHH Platforms**

4.1. Our website also references and include links to CHH Platforms. As a rule, these are identified by stating the platform type and respective third-party Internet address or the company/product logo in such platform. CHH has no influence whatsoever on the contents and design of websites of other providers linked to CHH Platforms. By referencing/linking these external websites we do not adopt their contents as our own.

#### 5. **Cookie Notice**

5.1. We may use various technologies to collect and store information when you interact with us via our website and/or CHH Platform. Please refer to our [cookie policy](#) by clicking here for more information.

#### 6. **Legal Basis for Processing**

6.1. We process Personal Information about you as a Responsible Party as described in this Privacy Policy, where such Processing is in our legitimate interests and in compliance with your privacy interests or fundamental rights and freedoms. Our legitimate interests typically include improving, maintaining, providing, and enhancing our technology, and services; and ensuring the security of the Website and CHH Platforms.



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## 7. **Lawfulness of Processing**

- 7.1. We commit to Processing your Personal Information lawfully, within reason and in a manner that respects your right to privacy and aligned to the purpose for which it is Processed, taking into account the adequacy and relevance thereof at all times.
- 7.2. The lawfulness for the Personal Information Processing is the performance of a contract or steps prior to communicating, engaging with you and/or referring you to our associates. Using this Personal Information is required to ensure that we are able to provide you with the information or assistance you require from us. Without this personal information you will not be able to communicate, engage with or being referred to our associates.

## 8. **Transfer of Personal Information outside South Africa**

- 8.1. We will not transfer any personal information across a country border without complying with the provision of section 72 of the POPIA and your prior written consent.

## 9. **Consent, Justification and Objections**

- 9.1. In so far that you have given the consent, CHH will also use your direct marketing data for marketing purposes, e.g., to send newsletters. The lawfulness for Processing your direct marketing data is our legitimate interest, e.g., to improve our communication, engagement, services, or your consent.
- 9.2. In so far that you have given the consent, we will also use your browser data for market research and the improvement of our Website CHH Platforms and services, and to improve your user experience. The lawfulness for Processing your browser data is your consent or our legitimate interest.
- 9.3. In so far that you have given the consent, we will also collect your usage data for statistical purposes, for the analysis of advertisement on our Website, CHH Platforms and for adapting the advertisement for our services to better match your interests. Log files are only used for statistical analysis of the visitors of



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our Website. The usage data is deleted after having been analysed. The lawfulness for Processing this usage data is for statistical purposes is our legitimate interest, e.g., internal organization, or your consent.

- 9.4. We will also use your usage data for internal system-specific purposes to secure our Website, CHH Platforms, and IT systems from malicious attacks by third parties. The lawfulness is a balancing of interests of the conflicting interests of the security of the IT systems on our part and your potentially conflicting interests in a non-processing of the usage data by us. Taking into account the security and organizational measures of the Processing of the usage data by CHH, we consider your rights and interests appropriately taken into account and protected.
- 9.5. Beyond these purposes, we use and Process your Personal Data only if you have expressly granted your prior consent thereto and if you have been informed about such purposes.

**Please note that: -**

- a) you can object, at any time for the Processing of your Personal Information irrespective of the purpose, on reasonable grounds (unless legislation allows for such Processing) by sending us an email [info@chh.co.za](mailto:info@chh.co.za), in a prescribed manner.
- b) providing the direct marketing data and browser data is optional. If you do not provide this Personal Information, you will not receive any direct marketing information from us, and your data will not be used to improve your user experience and will not be used for statistical; and
- c) Once we obtain the abovementioned objections, we will no longer Process your Personal Information.

10. **How Do we Use Your Personal Information**

- 10.1. We use your Personal Information:



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- a) To improve our products and your experience on the company sites and/or CHH Platforms.
- b) Evaluate the use of the company sites, CHH Platforms, products and/or services.
- c) Analyse the effectiveness of our advertisements, competitions, and promotions.
- d) Personalise your website and/or platform use experience as well as evaluate (anonymously, and in the aggregate) statics on website activity, such as what time you visited it, whether you have visited it before and what site referred you to it.
- e) Make the company sites and/or platforms easier to use and to better tailor the company sites. platforms and/or our products and services to your interest and needs.
- f) Help speed up your future activities and experience on the company sites and/or platforms. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time.
- g) Collect information about the device you are using and link this to your Personal Information so as to ensure that each company site and/or platforms presents the best web and/or platform experience for you.
- h) To contact you regarding products and/or services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us, and the communication is relevant or related to that prior request and made within any timeframes established by established by applicable laws.
- i) To suggest products and/or services (including those of relevant third parties) which we think may be of interest to you.
- j) To offer you the opportunity to take part in competitions or promotions.



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- k) To provide you with products and/or services that you request from us.
- l) To respond to your queries or comments.

10.2. Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction when we delete information from our services, we may not immediately delete residual copies from our products and/or services we may not immediately delete Personal Information from our backup systems.

10.3. **NOTE:** You can ***opt out*** of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to ***opt out***.

## 11. **Purpose**

11.1. Our intention in collecting, Processing and using your Personal Information is to the extent required to:

- a) fulfil the respective purposes, being for Processing your contact data, comment data, subscription data, purchasing data and/or job application data etc.
- b) Providing products and/or services that you make use of using our website and/or CHH Platforms, these are amongst others, downloads, discussion boards, individual requests (e.g., using a contact form), blogs or other offerings of CHH.

## 12. **Further Processing**

12.1. The further processing of your Personal Information will be compatible with the purpose for which it was initially collected. Your Personal Information will be received by our personnel and/or associates and we commit to ensuring that the use of your Personal Information will be aligned to our Privacy Statement to you.



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12.2. Your Personal Information will be Processed by personnel and/or associate of CHH in the respective departments, on a need-to-know basis:

- a) **Contact Data:** any departments that might be involved to Process your request.
- b) **Comment Data:** marketing or the respective service offering departments that are responsible for operating the [Drafting note: Insert the name of the Company]'s Platforms.
- c) **Application for Accommodation:** HR and the departments that are responsible for the placing students in the accommodation that you applied for.
- d) **Direct Marketing Data:** marketing departments.
- e) **Browser Data and Usage Data:** marketing and the IT departments that are responsible for operating the Website and CHH Platforms.

12.3. CHH has contracted external data processing service providers to collect, Process, or use Personal Information on behalf its and according to the instructions of CHH. Such service providers support CHH, especially relating to hosting and operating the Website and CHH's Platforms, marketing purposes, statistical analysis, improving the Website and CHH's Platforms and sending our email newsletters. If these external companies have access to Personal Information respective 'Data Protection Agreements' are in place.

12.4. Beyond that, we do not forward your Personal Information to other third parties, unless we are obliged to do so by virtue of statutory provisions or order of any judicial or other public authorities or you have explicitly given your consent for that purpose. In particular, your Personal Information will not be sold, leased, or exchanged.

### 13. **Information sent by Email**

13.1. Provided that you have given CHH your Contact Data for communication or direct marketing purposes and consented to the receipt of advertising and





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newsletters, we will Process your Personal Information in order to communicate with you on the basis of your interests or to send you advertising and/or marketing information. **The legal basis for the Processing of Personal Information for direct marketing purposes is your consent or our legitimate interest in direct mail communication. You can revoke your consent at any time and object to Processing for direct marketing purposes at any time by clicking on "opt out".**

13.2. **Providing your Contact Data for direct marketing purposes is voluntary. If you do not provide these to us, you will not receive any advertising from us.**

#### 14. **Participation in Chancellor House Holding's Platforms**

14.1. On our website, we offer you the opportunity to participate in CHH Platforms. In order to use them, it may be necessary to enter certain Personal Information (email address, first name and last name, company name and country, contact number ("**Contact Data**") to enable us to identify and, where appropriate, comply with the obligation to retroactively identify authors of illegal content. The details of this Contact Data are voluntary for you. **Please note that you may not be able to use CHH Platforms if you do not want to provide your Contact Data. This is associated with no further disadvantages.**

14.2. When participating in the CHH Platforms your Personal Information is not disclosed to other participants unless you have consented thereto in your user profile. In this context, our Website Terms pertaining to CHH Platforms apply when registering for access to CHH Platforms.

#### 15. **Data Protection for Minors**

15.1. The offers and services on this Website and/or CHH Platforms are not directed at children. We therefore assume that we will not become aware of any Personal Information pertaining to children and as such we will not be collecting any Personal Information purporting to be that of a minor.

#### 16. **Technical and Organizational Data Protection**



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16.1. We implement the technical and organizational measures that are commercially reasonable in relation to the respective purpose of data protection, in order to protect the information provided by you against abuse and loss. Such data is stored in a secure operating environment that is not accessible to the public. In addition, each of our employees is instructed on data protection and obliged to enter into a confidentiality agreement.

17. **Our Security**

17.1. We take appropriate and reasonable technical and organizational measures to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the Processing of the Personal Information. For further information about our security practices and/or security of your Personal Information, you may contact us at CHH.

18. **Retention and Restriction of Records**

18.1. Your Personal Information will be kept by us as long as necessary to provide you with the requested service. If CHH Platforms no longer need your Personal Information to comply with contractual or legal obligations, they will be deleted from our systems or anonymized accordingly so that identification is not possible, unless CHH has to keep the information, including your Personal Information, to comply with legal or regulatory obligations (e.g. statutory retention periods which may arise from the commercial laws or tax laws and may in principle be 5 to 10 years or, if during the statutory limitation periods, which are regularly 5 years, but may be up to 10 years, evidence must be secured).

19. **Data Subject Rights**

19.1. Under applicable law, you have the right under certain circumstances to: (i) request information about your stored Personal Information, (ii) rectification of your Personal Information, (iii) restriction of processing of your Personal Information, (iv) deletion of your Personal Information, (v) data portability, (vi)



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revocation of your consent for processing of your Personal Information and (vii) object to the processing of your Personal Information.

- 19.2. To exercise these rights, please contact our Information Officer at: [info@chh.co.za](mailto:info@chh.co.za). We respond to all requests we receive from users wishing to exercise their Personal Information protection rights in accordance with POPIA. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your contact, we will either direct the contact to reach out to you, or, if appropriate, we may respond directly to their request.
- 19.3. You also have the right to file a complaint with the Information Regulator at <http://www.justice.gov.za/inforeg/>.
- 19.4. Please feel free to direct any questions, comments, or complaints regarding this privacy statement or the privacy practices of CHH to our Information Officer: [info@chh.co.za](mailto:info@chh.co.za)

## 20. **Detail of Data Subject Rights**

- 20.1. **Right to information:** You have the right to ask us for confirmation of the Processing of your Personal Information in question and, if so, of your right to information about such Personal Information. The right to information includes, among other things, the Processing purposes, the categories of Personal Information being processed and the recipients or categories of recipients to whom the Personal Information is disclosed. You may also have the right to receive a copy of the Personal Information that is the subject of the Processing. However, this right is limited in that, the rights of others may limit your right to receive a copy.
- 20.2. **Right to rectification:** – You may be entitled to request the correction of incorrect Personal Information concerning you. In consideration of the purposes of processing, you have the right to request the completion of incomplete Personal Information, including by means of a supplementary statement.



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- 20.3. **Right to erasure (“Right to be forgotten”)**: - Under certain conditions, you have the right to ask us to delete your Personal Information and to delete Personal Information.
- 20.4. **Right to restriction of Processing**: – Under certain circumstances, you have the right to demand that we restrict the processing of your Personal Information. In this case, the corresponding data will be marked and processed by us only for specific purposes.
- 20.5. **Right to data portability**: - Under certain circumstances, you have the right to receive the Personal Information relating to you that you have provided to us in a structured, commonly used and machine-readable format and you have the right to transfer that data to another person without obstruction by us.
- 20.6. **Right to revocation of consent**: – If you have given your consent for some data processing activities, you may revoke your consent at any time with future effect. Such revocation shall not affect the lawfulness of the processing on the basis of the consent until the revocation.
- 20.7. **Right to object**: – For reasons arising from your particular situation, you have the right to object to the processing of Personal Information relating to you on the basis of Section 11 of Condition 2 of Part 3, POPIA (data processing based on legitimate interests). If you object, we will no longer process your Personal Information unless we can establish compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purposes of asserting, exercising or defending legal claims.