

PRIVACY POLICY – AVA

This privacy policy is complementary to, and should be read and understood together with, the general terms and conditions of use set out in the General Terms and Conditions of Use.

At Guardian Eye (Pty) Ltd, we take your privacy and your trust in us very seriously. This privacy policy provides you with information about how we collect, use and disclose your personal information.

1. This Privacy Policy

This privacy policy applies when you visit or use our website/s, app/s and other services that refer or link to this privacy policy (each, a "Service"). This privacy policy may be supplemented by additional privacy statements, terms or notices provided to you.

AVA owns or administers the Service, as identified therein, is the primary controller of your personal information provided to, or collected by or for, the Service.

We will indicate within service Orders what types of personal information are required and those that are requested. You may choose not to submit the requested information, but that may limit or prohibit the services that AVA can provide to you.

2. Information We Collect

We collect information about you in three ways: directly from your input, from third-party sources, and through automated technologies.

2.1 Data You Provide to Us

The types of personal information that we collect directly from you depend on how you interact with us and the Service, which may include:

- Contact details, such as your name, email address, postal address, social media handle, and phone number;
- Account login credentials, such as usernames and passwords, password hints and similar security information;
- Payment information, such as a credit or debit card number;
- Company name, registration numbers, VAT number and address;
- Comments, feedback and other information you provide to us, including search query data and questions or information you send to customer support; or
- Interests and communication preferences, including preferred language.

2.2 Data From Your Organisation

We may obtain personal information about you from the organisation with which you are employed or affiliated to activate and manage your access to and use of the organisation's subscription to the Service, including:

- Contact details, such as your name and organisational email address, postal address, and phone number;
- Other account registration information such as job title; or
- Organisational user ID

2.3 Data From Other Sources

We also may obtain contact details and other information about you from other third parties, including:

- Social networks when you grant permission to the Service to access your data on one or more networks;
- Businesses with which we offer co-branded services or engage in joint marketing activities; or
- Publicly-available sources and data suppliers from which we obtain data to validate or supplement the information we hold.
- Credit bureaus from which we obtain credit ratings;
- Third-party databases used to verify your (or your representative's) identity and address as is required by us in law.

2.4 Data From Service Use, Including Cookies

The Service may automatically collect information about how you and your device interact with the Service, including:

- Computer, device and connection information, such as IP address, browser type and version, operating system and other software installed on your device, mobile platform and unique device identifier and other technical identifiers, error reports and performance data;
- Usage data, such as the features you used, the settings you selected, your URL click stream data, including date and time stamp and referring and exit pages, search terms you used, and pages you visited or searched for on the Service;
- For educational Services, the course modules and test questions you view, answer or complete; or
- For location-aware Services, the region, city or town where your device is located to provide you with more relevant content for where you are in the world.

We collect this data through our servers and the use of cookies and other technologies. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. We may use cookies and other technologies to store your preferences and settings, help you with signing in, provide targeted ads and analyse site operations. You can control cookies through your browser's settings and other tools. However, if you block certain cookies, you may not be able to register, login, or access certain parts or make full use of the Service. For more details, see the cookie policy of the Service.

3. How We Use Your information

Depending on how you interact with the Service and us, we use your personal information to:

- Provide, activate and manage your access to and use of the Service;
- Process orders, installation, activation, upgrade, downgrade, of your Service;
- Provide technical, product and other support and to help keep the Service working, safe and secure;
- Enhance and improve the Service and our other products, events, and services and to develop new products, services and benefits;
- Offer you customised content and other personalisation to make the Service more relevant to your interests and geography;
- Respond to your requests, inquiries, comments and concerns;
- Notify you about changes, updates and other announcements related to the Service and our other products and services;
- Deliver targeted advertisements, promotional messages, notices and other information related to the Service and your interests;
- Provide you with promotional messages and other information about products, events and services of ours, our affiliates and third parties such as sponsors;
- Identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns and evaluating our business performance, or in different ways according to a customer agreement; or
- Comply with our legal obligations, resolve disputes, and enforce our agreements.

If you are an administrator of an organisation with a subscription to the Service, we will use your details to communicate with you about your organisation's subscription and related services.

4. Sharing of Your Information

4.1 Your Organisation

If you access the Service through a subscription administered by your organisation, your personal information and specific usage data gathered through the Service may be accessed by or shared with the administrators authorised by your organisation for usage analysis, subscription management and compliance, training course progress, performance and remediation, cost attribution and departmental budgeting.

4.2 Our Service Providers

Dependent upon the Services provided, we share information with our service providers, suppliers, agents and representatives, including but not limited to, electronic communications network operators, payment processors, customer support, email service providers, event venues and service providers, IT service providers, marketing service providers, research providers, mailing houses and shipping agents.

The purpose of sharing the information is to process the information as necessary to provide the Service, complete a transaction or fulfil your request or otherwise on our behalf based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures.

4.3 For Legal Reasons

We also will disclose your personal information if we have a good faith belief that such disclosure is necessary to:

- meet any applicable law, regulation, legal process or other legal obligation;
- detect, investigate and help prevent security, fraud or technical issues; or
- protect the rights, property or safety of AVA, our users, employees or others; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or a merger with another company.

5. Grounds for Processing

When we collect or otherwise process any personal information within the scope of the Protection of Personal Information Act (POPIA), we do so:

- where necessary to provide the Service, fulfil a transaction or otherwise perform a contract with you or at your request before entering into a contract;
- where necessary for our compliance with applicable law or other legal obligation;
- where necessary for the performance of a task carried out in the public interest;
- where necessary to enable our customers to comply with their legal obligations;
- where applicable, with your consent; or
- where necessary to operate our business, protect the security of our systems, customers and users, detect or prevent fraud, or fulfil our other legitimate interests as described in sections 2-4 above, except where your privacy rights override our interests.

Where we rely on your consent to process personal information, you have the right to withdraw your consent at any time, and where we rely on legitimate interests, you may have the right to object to our processing.

6. Data Retention

We retain your personal information for as long as necessary to provide the Service and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements.

7. Locations of Processing

Your personal information is collected, stored and processed in South Africa. We take steps, including through contracts, intended to ensure that the information continues to be protected wherever it is in a manner consistent with the standards of protection required under POPIA.

8. Data Security

We implement technical and organisational measures to seek to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information.

9. Your Communications Preferences

You can customise and manage your communications preferences and other settings when you register with the Service, by updating your account features and preferences, by using the "opt-out" mechanisms such as "unsubscribe" or other means provided within the communications that you receive, or by contacting us. We reserve the right to notify you of changes or updates to the Service whenever necessary.

10. Accessing and Updating Your Information

10.1 Your Account

The Service may allow registered users to directly access and review their account information and make corrections or updates upon login at any time. Keeping such information up to date is the responsibility of the user.

10.2 Your Rights

You have the right under POPIA, as may be applicable, to request free of charge:

- access to your personal information;
- rectification or erasure of your personal information;
- restriction of our processing of your personal information, or to object to our processing; and
- portability of your personal information.

If you wish to exercise these rights, please submit your request in writing to us. We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

11. Changes

We will update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Service or by other means.