



**clingglobal**

**Clinglobal Privacy Notice**

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# Purpose and Scope

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This website is owned by Clinglobal. Personal Information (defined below) provided may be accessible to Clinglobal's affiliates, vendors and suppliers in other countries. If you are visiting this site from a country other than South Africa, your Personal Information collected on this site will be transferred outside of your country. The level of legal protection for Personal Information is not the same in all countries and the laws may be more protective in your country than in the countries where we process your information. However, we will take reasonable efforts and security measures as described in this Privacy Statement in an effort to keep your information secure. By using this site, you consent to the collection, storage, and processing of your Personal Information in South Africa and in any country to which we may transfer your information in the course of our business operations. If there is any conflict between the terms in this privacy policy and the local legislation, the local legislation shall govern.

We respect the privacy of everyone who visits this website. As a result, we would like to inform you regarding the way we would use your Personal data. We recommend you read this Privacy Notice and Consent so that you understand our approach towards the use of your Personal data. By submitting your Personal data to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this notice. By using this web site, you acknowledge that you have reviewed the terms of this Privacy Notice and Consent to Use of Personal data (the "Privacy Notice and Consent") and agree that we may collect, use and transfer your Personal data in accordance therewith.

If you do not agree with these terms, you may choose not to provide any Personal data, but this may impact on our ability to support you as a customer or supplier. This Privacy Notice and Consent forms part of our Terms and Conditions of Use and such shall be governed by and construed in accordance with the relevant laws. This Notice explains how we obtain, use and disclose your personal data, as is required by the General Data Protection Regulation. At Clinglobal we are committed to protecting your privacy impact and to ensure that your Personal data is collected and used properly, lawfully and openly and has therefore established a comprehensive privacy program. This Privacy statement applies to all "Clin" group of companies operations as well as websites, mobile applications and digital services ("websites") that link to or post it.



# Responsibility

The Data Protection Officer (DPO) is responsible to implement appropriate policies, practices and procedures to support all the Articles listed, supported by members of the Data Protection Team (DPT).

# Definitions

<b>Personal data / information</b>	<p>According to the POPI Act (South Africa only) “Personal information” means data relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act (South Africa only), which has more specific examples if you need them, can be found at the following link:</p> <p><a href="http://www.gov.za/documents/download.php?f=204368">www.gov.za/documents/download.php?f=204368</a></p> <p>For the definition of “Personal data” as used in the GDPR please see the text of the GDPR, Article 4 available from <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L.2016.119.01.0001.01.ENG&amp;toc=OJ%3AL%3A2016%3A119%3ATOC">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L.2016.119.01.0001.01.ENG&amp;toc=OJ%3AL%3A2016%3A119%3ATOC</a></p>
<b>Cookies</b>	<p>Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any data stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.</p>



# Collection of personal data

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We collect and process your Personal data mainly to provide you with access to our services and products, to help us improve our offerings to you, to support our contractual relationship with you and for certain other purposes explained below. The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.

We collect data directly from you where you provide us with your personal details, for example when you purchase or supply a product or services to or from us or when you submit enquiries to us or contact us. Where possible, we will inform you what data you are required to provide to us and what data is optional.

Examples of data we collect from you are:

- Name
- Address
- E-mail address
- Telephone/cell number
- User-generated content, posts and other content you submit to our web site.

We also collect data about you from other sources as explained below.

With your consent, we may also supplement the data that you provide to us with data we receive from other companies in our industry in order to offer you a more consistent and personalized experience in your interactions with Clinglobal.

# Collection of non-personal data

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We may automatically collect non-Personal data about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this data and it is only used to assist us in providing an effective service on this web site. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this website.



# Cookies policy

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We use the term “cookies” to refer to cookies and other similar technologies covered by the GDPR & POPI Act (South Africa only) on privacy in electronic communications.

## **What is a cookie?**

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any data stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

## **Why do we use cookies?**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer. For further details on the various types of cookies that we use, please read our cookie policy.

## **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third-party websites for data regarding their use of cookies.

How do I reject and delete cookies?

We will not use cookies to collect personally identifiable data about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third party suppliers by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further data on cookies generally. For data on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly.



# How we use your data

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We will use your Personal and Non-Personal data only for the purposes for which it was collected or agreed with you, for example:

- Analyse the effectiveness of our advertisements, competitions and promotions.
- Collect data about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal data so as to ensure that the site presents the best web experience for you.
- Evaluate the use of the site, products and services.
- For audit and record keeping purposes.
- For market research purposes.
- For monitoring and auditing site usage.
- Help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal data and will not request the same data a second time.
- In connection with legal proceedings.
- Make the site easier to use and to better tailor the site and our products to your interests and needs.
- To advertise vacant positions and give you the opportunity to apply for such by making use of our BambooHR application software.
- Offer you the opportunity to take part in competitions or promotions.
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it.



# How we use your data continued

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- Suggest products or services (including those of relevant third parties) which we think may be of interest to you.
- To assist with business development.
- To carry out our obligations arising from any contracts entered into between you and us.
- To conduct market or customer satisfaction research or for statistical analysis.
- To confirm and verify your identity or to verify that you are an authorised customer for security purposes.
- To contact you regarding products and 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 applicable laws.
- To notify you about changes to our service.
- To respond to your queries or comments.
- We will also use your Personal data to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
- Where we collect Personal data 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 data from accidental or malicious destruction, when we delete data from our services, we may not immediately delete residual copies from our servers or remove data from our backup systems.
- 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 data and means necessary to opt out.



# Disclosure of personal data

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We may disclose your Personal data to our business partners who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your Personal data with, and obtain data about you from:

- Third parties for the purposes listed above.
- Other companies in our industry when we believe it will enhance the services and products, we can offer to you, but only where you have not objected to such sharing.
- Other third parties from whom you have chosen to receive marketing data.

We may also disclose your data:

- Where we have a duty or a right to disclose in terms of law or industry codes.
- Where we believe it is necessary to protect our rights.



# Personal data security

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We are legally obliged to provide adequate protection for the Personal data we hold and to stop unauthorised access and use of personal data. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal data is secure.

Our security policies and procedures cover:

- Acceptable usage of personal data.
- Access to personal data.
- Computer and network security.
- Governance and regulatory issues.
- Investigating and reacting to security incidents.
- Monitoring access and usage of personal data.
- Physical security.
- Retention and disposal of data.
- Secure communications.
- Security in contracting out activities or functions.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal data that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal data agrees to treat your data with the same level of protection as we are obliged to.



# Access to your personal data

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You have the right to request a copy of the Personal data we hold about you. To do this, simply contact us at the numbers/addresses listed on our contact us page and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our GDPR and POPI Act (South Africa only) Policy.

# Correction of your personal data

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You have the right to ask us to update, correct or delete your personal data. We will take all reasonable steps to confirm your identity before making changes to Personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal data accurate and up to date by notifying us of any changes, we need to be aware of.

# Retention of personal data

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Clinglobal will retain your data in compliance with the GDPR & POPI Act and in compliance with other applicable legislation.



# Automated decision making

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Clinglobal does not use Automated Decision Making in connection with your personal data.

## Changes to this notice

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Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

## Lodging a complaint

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You are entitled to lodge a complaint with the data protection authority in your relevant European Union or European Economic Area state. The list of contacts is available at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

In South Africa please contact the Information Regulator South Africa at [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za) or visit <https://www.justice.gov.za/infoereg/index.html> for more information.



# How to contact us

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If you have any queries about this notice or believe we have not adhered to it, or need further data about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal data, please contact us at the numbers/addresses listed on our website <https://clinglobal.com> in the organisation PAIA Manual.

Clinglobal	Phone: +27(0) 51 445 2424
Contact Details	Email: <a href="mailto:privacy@clinglobal.com">privacy@clinglobal.com</a>
	Or contact the Clin group Data Protection Officer: Dr Lizel Roets, <a href="mailto:lizel.roets@clinglobal.com">lizel.roets@clinglobal.com</a>

