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**IDA RISK MANAGEMENT (PTY) LTD**  
**Website and Application Terms of Use and Privacy Notice**

**Introduction**

IDA RISK MANAGEMENT (Pty) Ltd ("IDA RISK") is a Registered Financial Services Provider. By accessing any of our services or websites ("**Websites**"), you agree to access and use the services or Websites in accordance with these terms and conditions, which we update from time to time. Please consider these terms and conditions carefully before using or accessing any of the services or Websites. Should you not agree with any term or condition set out herein, please cease using and accessing our services or Websites.

**About this Privacy Notice**

This Privacy Notice applies when you visit and/or use any of our services or Websites and other IDA RISK products and/or services. We may update this Privacy Notice from time to time and if we make any material changes, we will notify you when you next access our websites, and/or products and services.

**Data Privacy**

IDA RISK takes data privacy seriously. We are committed to safeguarding the privacy and security of personal information that we may collect from users of our websites, products, services and/or our clients. The purpose of this Privacy Notice is to explain how we collect, use, store and otherwise process personal information. We may indicate within the registration processes of our products and services and other registration forms 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 IDA RISK is able to provide to you. Our processes and operations are in compliance with and pursuant to the Protection of Personal Information Act, 2013 ("**POPI Act**").

**Third Party Products and Services**

This Privacy Notice does not apply to any third-party products, services and/or websites that you may access through links from our websites. We are not responsible for those products, services and/or websites or how they process your personal information. If you follow a link to any such products, services

and or websites, you must consider their privacy notices before you submit any personal information to such third parties.

### **How do we collect Personal Information?**

#### ***Information you give us***

You may give us personal information and other information about yourself by registering on the websites, completing forms on the Websites, using or accessing our products and/or services or by corresponding with us by email, phone or otherwise. This includes information you provide when you register to use the websites, use or access our products and/or services, request products on the websites or the Applications, participate in social media platforms on or through the websites, enter a competition, promotion or survey and when you report a problem with our websites and/or the Applications. The information you give us may include your name and surname, birth date, gender, country of residence, closest city, address, email address, phone number, age, photograph, username, password and other registration information.

We may also obtain personal information about you from your employer in order to activate and manage your access to and use of your employer's use of our products and services.

#### ***Information we collect about you and your device***

Each time you access or use the Websites or the Applications, we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, non-personal browsing habits and click patterns; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the websites (including date and time), products you viewed, purchased or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, any phone number used to call our customer service number and related uses.

#### ***Information we collect about you via advertising***

From time to time, we may place advertisements on third party websites. When you view or otherwise interact with our advertisements, we and our partners may use various technologies (such as cookies) to collect and store information about you including cookie data and anonymised IDs for attribution and advertising purposes. We use these technologies to help us understand more about our customers and the effectiveness of our advertisements.

### ***Information we receive from other sources***

We may receive information about you if you use any of the other websites we operate (particularly in our group of companies) or the other services we provide.

For our auto related products and services, the motor vehicle dealerships, commercial banks, insurers, and value-added product providers use our various products and services for the efficient functioning of the vehicle finance process. The transactional information is processed through our products and services as part of the sale and finance transaction.

### ***Location Information***

We may also collect information about your location, based on your device (such as X-Y coordinate data) when you access the Websites or the Applications.

### **How do we use the collected information?**

We may use the information we have collected about you, including your personal information, in the following ways:

- to allow us to provide you with our products and services;
- to conduct customer satisfaction surveys, assist our customers to maintain and manage their relationships with you and other data products related to the valuation and pricing of vehicles in South Africa;
- to allow us to provide you with other information, products or services that you request from us or which we feel may interest you, subject always to your right to 'opt out' of any such correspondence;
- to process payment details in order to complete the purchase of any product or service;
  
- to allow you to participate in interactive features of the Websites and/or our Applications when you choose to do so;
- to conduct competitions and promotions;
- to contact you about products and services you have requested;
- to notify you about changes to the Websites, the Applications and products and services we offer;
- to ensure that content from the Websites and the Applications is presented in the most effective manner for you and for your device;

- to enhance and improve our products and services and to develop new products, services and benefits;
- to administer the Websites and the Applications and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to ensure the Websites and the Applications is safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

We may also use data held about you for another purpose, but only where such purpose is communicated to you at the point of collecting the personal information from you.

### **Data Retention**

IDA RISK strives to meet your expectations insofar its products and services are concerned. Accordingly, we retain your information for so long as it is necessary to provide the products and services to you, complete the transactions you have requested or for other important purposes to enable us to comply with our legal obligations, maintain appropriate and complete business and financial records, resolve disputes, maintain security and to detect and prevent fraud and the abuse of our products and services. If you access any of our products or services through your employer's subscription or account, we retain the account holder's contact details after the termination of the access to our products and services to continue our communications with you. You may object, at any time, to this communication by changing your preferences or unsubscribing to these communications, by clicking the hyperlinks in those communications.

### **Cookies**

A computer cookie is a small piece of data stored on your device by our Websites when you use or access the Websites. The purpose of a cookie is to identify specific users and improve your web browsing experience. Our Websites uses cookies to give you a personalised experience that suits your online behaviour, which include personalising content and advertisements, providing social media features and to analyse our traffic. We may also from time to time share information about your use of our Websites and Applications with our social media, advertising and analytics partners.

### **Our Partners**

We have a number of partners who may obtain certain of your personal information from us as part of our products and/or services. If and to the extent that our partners wish to process your personal information, they must do so in compliance with the POPI Act, including a notification to you as may be appropriate

pursuant to section 18 of the POPI Act. Our partners include the motor vehicle dealerships, commercial banks, insurers, value-added product providers.

### **Your rights**

In terms of the POPI Act, you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information. Amongst other things, you may object to your personal information being processed pursuant to section 11(3) of the POPI Act. To do so, please lodge your request in the prescribed manner using the prescribed form, which you may submit to the email address [POPIA@Lightstone.co.za](mailto:POPIA@Lightstone.co.za).

Pursuant to section 23 of the POPI Act, you may request us to confirm, free of charge, whether we hold any of your personal information. You may also, against payment of the prescribed fee, request the record or a description of the personal information about you held by us, including information about the identity of all third parties, or categories of third parties who have access to this information. You are required to provide adequate proof of identity in order to exercise these rights.

You are also advised of your rights pursuant to section 24 of the POPI Act to request us to i) correct or delete your personal information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or ii) destroy or delete a record of your personal information if we are no longer authorised to retain it in terms of section 14 of the POPI Act.

### **Contact Us**

You may contact us with any queries or concerns regarding this Privacy Notice at [POPIA@Lightstone.co.za](mailto:POPIA@Lightstone.co.za).

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