

# Privacy Policy

GenLeads Pty Ltd Information Officer contact details:

- Physical Address: 59 Kerk Street, Shop 4a, Highveld Visitors Centre, Ermelo, Mpumalanga
- E-mail: [info@genlead.co.za](mailto:info@genlead.co.za)
- Telephone number: 0170040212
- WebSite: [www.genlead.co.za](http://www.genlead.co.za)

In this policy, “we”, “us” or “the Company” refers to GenLead Pty Ltd.

Genleads Pty Ltd operates the [www.Genleads Pty Ltd.co.za](http://www.GenleadsPtyLtd.co.za) website, as well as the Genleads Pty Ltd mobile application, found on the Apple App Store and Google Play Store, referred to as the “Service”.

This page informs you of our policies regarding the collection, use, and disclosure of Personal Information when you use our Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

## **Definition of Personal Information**

According to the Act “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, COR Concepts also includes the following items as personal information:

All addresses including residential, postal, and email addresses.

## **The information we collect**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information (“Personal Information”) may include, but is not limited to:

- Name
- Email address
- Contact numbers
- Location
- Banking Details for invoicing
- Company Details ie: VAT Nr, Reg Nr and all necessary info required in order to do our invoicing
- Certain services require us to allow for cookie tracking where the user can opt in or out

We collect technical information when you use our Service. This includes information such as Internet Protocol (IP) address, the type of device you use, your device operating system and browser type, a unique device identifier, the path you take through our Service, the time and date of your visit and other information about your session on our Service.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage 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 Service.

All personal information that is supplied to us must be accurate, up-to-date, not misleading, and complete in all respects. You undertake to immediately advise us of any changes to your personal information should any of these details change.

## **How we collect information from you**

We collect information from you in a variety of ways. It may be:

- Provided directly by you;
- Collected from a device associated with you or your household;
- Cookie Tracking

Provided directly by you;

You actively share information with us in various ways. For example, you share information when you:

- Create an account on our Service.;
- Request customer service or contact us;
- Post a review or comment on one of our social media pages, or post a rating, review, or other user-generated content on our Service; and
- Participate in a contest, sweepstake, promotion, or survey.

Collected from a device associated with you or your household;  
You passively provide us information through technology. Some of this information may be linked to you personally. This information helps our Service work correctly and supports our customer marketing and analytics efforts – our work to understand our customers’ needs and provide information about our products and services.

All Personal Information which you provide to us will be used and/or retained only for the purposes for which it is collected, whereafter it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

## **How we use your information**

We collect and process your Personal Information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly. We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;

- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

## **Transferring personal information to third parties and overseas**

Customer personal information may be shared with the following categories of recipients:

- Cloud-based storage facilities and data center
- Authorities and regulatory bodies
- Business service providers

We have agreements in place to ensure that service providers comply with the privacy requirements as required by the Protection of Personal Information Act.

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organization, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

## **Children's Privacy**

We do not knowingly collect personally identifiable information from children. If you are a parent or guardian and you are aware

that your child has provided us with Personal Information without your consent, please contact us. We will delete such information from our Service immediately.

## **Information Security**

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information remains secure and industry best practices are followed.

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

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

## **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **What happens if we have a security breach?**

We have an existing security policy and implement and continually updates its security systems. We have developed a procedure we follow if we have a security breach (compromise) as defined in section 22 of POPIA. Part of this procedure is that we will let you know about it as soon as possible and let you know what steps you can take to protect yourself. We will also notify the Information Regulator and if appropriate the South African Police Services so that they can take appropriate action. If you become aware of any security breach (or if you think there may have been a security breach) then please let us know as soon as possible by contacting us using the contact details at the beginning of this Privacy Policy.

## **Your Rights: Access to information**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us with the contact details at the beginning of this Privacy Policy and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to payment of a legally allowable fee.

## **Correction of your information**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to Personal Information we may hold about you. To do this, simply contact us with the contact details at the beginning of this Privacy Policy and specify what information you require. We would appreciate it if you would keep your personal information accurate.

## **How to complain to the Information Regulator**

Genleads Pty Ltd use of personal information is governed by PAIA and POPIA and the Information Regulator is responsible for making sure that Genleads Pty Ltd complies with these laws. Complaints can be lodged with the Information Regulator. These are their details:

- Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Complaints E-mail: [complaints.ir@justice.gov.za](mailto:complaints.ir@justice.gov.za)
- General enquiries E-mail: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)
- Website: <https://www.justice.gov.za/inforeg/index.html>

## **How to contact us**

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal

information, please contact us with the contact details at the beginning of this Privacy Policy.

## **Changes To This Privacy Policy**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If our Service is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to provide our Service to you.

## **LAST UPDATED**

Wednesday, 30 June 2021