
PROTECTION OF PERSONAL INFORMATION AND PRIVACY POLICY COMB COMMUNICATIONS PROPRIETARY LIMITED

COMB COMMUNICATIONS PROPRIETARY LIMITED (“Comb Communications”) has pioneered the use of ground-breaking technology in the market place and has a track record spanning over ten years with more than one million gate openings daily. Comb Communications has grown into a business that is leading the way into the future of integrated systems and web service platforms and will continue to deliver state-of-the-art offerings that set the benchmark in the industries of the future all whilst leveraging “the internet of things” and making life easier with more intuitive technology.

Comb Communications provides smart access control solutions and intuitive management thereof through current technologies and web-based applications, along with the backing of a design focused development house. The functional products manufactured are integrated with design-focused web-based platforms that provide the power to control any form of access.

Comb Communications knows that current and potential customers, those persons and entities who are suppliers to us and all our employees care how personal information about them is used and shared. This policy describes the types of personal information that we may collect, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect the privacy of those persons and entities we deal with.

As used throughout this policy, the terms "**the Company**", "**us**" or "**we**" refers to **COMB COMMUNICATIONS PROPRIETARY LIMITED** and its agents in South Africa.

Contact Details

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Purpose and Objective

This policy governs the collection, use and disclosure of personal data provided to Comb Communications. It directs how we gather, store and handle personal data of Data Subjects, customers and other stakeholders, in accordance with relevant data protection legislation.

The Protection of Personal Information Act describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. This includes name, contact details, nationality and identity number.

This policy complies with the principles contained in the Electronic Communications and Transaction Act 25 of 2002 (ECT), for electronically collecting personal information and the right to notify data subjects how we handle personal information given to Comb Communications as per the Protection of Personal Information Act 4 of 2013 (POPIA).

We shall disclose in writing, upon request, the specific purpose for which we use, collect and store your personal information. We will also keep a record of that personal information and the specific purpose for which we have used it.

We will not use your personal information for any purpose, other than that which we disclosed to you herein, unless you give us your express written permission to do so, or unless we are permitted/required to do so, by law.

Introduction

By providing us with any information you will be agreeing to the provisions set out below, together with any other terms you have agreed with us where relevant. Please ensure you have read and understood these terms before you send us any information. They will apply to any information you have already provided.

If you are a customer or client of Comb Communications (and/or any of its subsidiaries), details of the information we collect and how we use it will also be set out in the terms and conditions of the relevant product or service. In the event of a conflict between this Data Protection Policy and the terms and conditions of your specific product or service, the terms and conditions of your specific product or service will take precedence.

We reserve the right to revise or supplement this Data Protection Policy from time to time at our sole discretion, and you agree to revisit this policy regularly on our website to ensure you are familiar with the most current version. By continuing to deal with us you will be agreeing to any such changes.

You must not send us personal information about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this policy. This is because we will assume he or she has consented – although we may still ask for confirmation from them. Where you do give us information about someone else, or someone else discloses a connection with you, that information may be considered with your other personal information.

We treat your privacy very seriously and we understand that you will wish to know how we will use the information we collect from or about you. We use your personal information in accordance with this Data Protection Policy and will fully comply with all applicable South African legislation. It is important that you take all necessary and appropriate steps to protect your data yourself (for example, by ensuring that all passwords and access codes are kept secure).

Use of Our Website

If you use our website, you must keep your access details (including, your user name and password) confidential and not allow other people to use it. You also accept full responsibility for all activities that occur under your access details or password and accept responsibility for sharing your user name and password. Comb Communications may refuse to provide products and/or services to you if we are unable to verify any information that you provide to us.

You agree that the following actions shall be material breaches of these terms and conditions:

- signing in as, or pretending to be, another person;
- transmitting material that violates, or could violate, the intellectual property rights of others or the privacy of others;
- using interactive services in a way that is intended to harm, or could result in harm to you or to other users of the Site;
- gathering information about others without obtaining their prior written consent;
- You also agree that any use of your access details shall be regarded as if you were the person using such information.

Comb Communications does not guarantee the operation of our website or the information, content, tools or materials on our website. You agree that you use our website at your own risk.

Security and Confidentiality

We understand the value of your personal information and therefore will take all reasonable steps to protect your personal information from loss, misuse or unauthorised alteration, access or disclosure, by the following:

- Your personal information is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of your information.
- Comb Communications uses SSL Web Server Certificates to offer secure communications.
- We constantly monitor the latest internet developments to ensure our systems evolve as required. We also test our systems regularly to ensure that our security mechanisms are up to date.
- Comb Communications does not make any warranties or representations that content shall be entirely safe or secure. We are subject to the Protection of Personal Information Act 4 of 2013, which we comply with

Your attention is drawn to the fact that information transmitted via the Internet is susceptible to monitoring and interception. Users bear all risk of transmitting or storing information in this manner. Comb Communication will not be liable for any loss, harm or damage suffered by you as a result of transmitting or storing any information on this system. Please be aware that any unsolicited confidential or personal information sent or stored via the system cannot be guaranteed to remain safe, secure or confidential and storing such information on the system should be avoided.

Third Party Links

The website may contain links to third party websites, or you may be directed to Comb Communication through a third-party website. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them.

We are not responsible for any representations, information, warranties or content on any website of any third party, we do not exercise control over third parties' privacy policies, and you should refer to the policy of any such third party to see how they protect your privacy.

Protection

This policy seeks to protect Comb Communications from various very real data security risks including; Breaches of confidentiality through data breaches, hacking risks, and the risks of liability in relation to its clients, third party's data acquired from such clients and all its own employees. The rules and standards set out in this policy applies regardless of:

- whether personal data relates to a client or an employee of Comb Communications, and/or
- is stored electronically, digitally, on paper, or on other materials, or through other methods.

General rules relating to Personal Data Personal data shall always be:

- processed fairly and lawfully, in accordance with legal standards applicable to such data or data categories;
- obtained only for specific lawful purposes;
- adequate, relevant and not excessive;
- accurate, and kept up to date;
- held for no longer than necessary for the purpose it was obtained for;
- processed in accordance with the rights of data subjects;

All personal data shall be deemed confidential information and be handled as such. The only person/s entitled to access data covered by this policy, will be those who need to access it for the execution of their direct work services or required outputs. Under no circumstances will data or personal information be shared outside the scope of required work outputs, or informally. In the event of any doubt, an employee shall be entitled to access confidential information only after obtaining authorisation from their line manager or a senior manager, where any work output requiring access is unusual or out of the ordinary. Employees will receive induction and on-the-job training in relation to all security standards applicable to such employee's service delivery and work outputs involving personal information of data subjects.

Employees shall keep all data secure by taking sensible practical precautions and complying with all rules, practices and protocols:

- Strong passwords shall always be used;
- Passwords shall not be shared under any circumstances; Note: In the exceptional circumstance that a password may require to be shared, it shall only take place after explicit, provable authorisation has been procured from a senior manager or line manager before sharing it, and then only for the stated purpose. All necessary steps shall be taken after a password has been shared in such exceptional circumstances, to reset it to a strong, unique password to avoid future data compromise or breach.

Disciplinary Code and Incorporation of this Policy into the Employee's Employment Contract

This data protection policy governs every employee of Comb Communication, both during his/her services to it, and to the extent applicable, after termination of services. To the extent that this policy sets out workplace rules (as defined) governing the employee in the course of his/her work and services to the company, it shall form part of the company's Disciplinary Code and Procedure and is hereby also incorporated into it. A breach of any rule in relation to the protection of personal data set out in this policy shall, in the event of breach thereof, form the basis of disciplinary action. In appropriate circumstances a breach hereof proven in a disciplinary enquiry may lead to dismissal. The imposition of any disciplinary sanction or dismissal shall not preclude the company from instituting civil proceedings against an employee who acted in breach of this policy where such breach has resulted in liability, loss, reputational damage and/or other damages to the company in the course of pursuing its commercial operations.

All employees shall continually be responsible for ensuring the safeguarding, protection and avoidance of any unauthorised disclosure or breach of data personal data in the execution of employment duties and services to Comb Communications, or otherwise in the course of rendering services or being associated with the company.

We will collect, store, and use the following categories of personal information about you:

- Names and titles
- Addresses, including physical, registered, invoice, delivery and site addresses
- Contact details such as telephone numbers, mobile numbers, facsimile numbers and email addresses
- Registration details such as Company Registration Number, Government Business Code, Government Corporation Code, AEO Number, Chamber of Commerce Number, Credit Agency Code, Driving Licence Number, Global Tracking Name, Road Carrier Registration Number, SEPA Creditor Identifier, Shipping Company Carrier / Principal Code and Standard Industrial Classification
- Customs information including Customs Carrier Code, Customs Client Code, Customs Controlled Premises Code, Customs Manifest Provider Code, Customs Supplier Code, Trader Excise Number, Deferment Approval Number
- Tax status information including Company VAT Number
- Bank account details including Account Number, Account Name
- Information concerning your financial standing and credit worthiness

- Preferred language, date of birth and nationality
- Passport and identity information
- Information extracted through Google analytics
- Payment defaults, civil legal matters and judgements
- CCTV footage
- Information about your use of our information and communications systems

Uses of the Information

We do not sell, trade, share or rent your personal information to any third party for marketing purposes unless you have given your permission for us to do so.

We may, for an indefinite period, unless otherwise notified by you, use the information provided by you for promotional, marketing, research and profiling purposes. We will add your contact details to our database and may also send you emails from time to time about our offers and offers of our third-party advertisers.

Additionally, we may use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner;
- To provide you with information, products or services that you request from Us or which We feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered between you and Us;
- To allow you to participate in interactive features of our service, when you choose to do so;
- To notify you about changes to our service; and
- We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and We or they may contact you about these by post or telephone.

IF YOU DO NOT WANT US TO USE YOUR DATA IN THIS WAY, OR TO PASS YOUR DETAILS ON TO THIRD PARTIES FOR MARKETING PURPOSES, PLEASE NOTIFY US BY ONE OF THE RELEVANT COMMUNICATION METHODS.

We may disclose your personal information to third parties:

- If We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets;
- If Comb-Communications or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply Our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Comb-Communications, Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent or guardian and the processing, transferring or disclosing of your information as set out above will be undertaken strictly in accordance with South African legislation.

We may contact you about products and services available by Comb Communications that we believe may interest you from time to time. We may do this by post or by phone unless you have told us in writing not to; and by e-mail, text or other electronic means if you have told us in writing that we can. You may tell us in writing at any time if you change your mind. We will respect any election by you, through signing up to a preference service or otherwise, not to be contacted by a certain method of communication unless and until you notify us in writing that you wish to be contacted by such method again.

Your personal information may be passed to and used by companies within the Comb Communication Group and our agents and sub-contractors who administer or process the information on our behalf. Please contact our office at our above address for an up-to-date list of the current members of Comb Communication Group

In addition to the personal information you submit, we may collect information about your computer including, where available, your IP address, operating system and browser type for system administration. We collect aggregated site-visitation statistics using cookies. We do not track individuals' use of the site. When someone visits the site, a cookie is placed on the customer's machine (if the customer accepts cookies) or is read if the customer has visited the site previously.

The use of any Comb Communications Mobile App

By using a Comb Communications App, you acknowledge and agree to the Privacy Policy of the App. The Privacy Policy relates to our collection and use of the personal information you supply to us through your use of the services on the App. This policy accordingly governs the way your personal information will be dealt with by Comb Communications. Personal information for the purposes of this document means all information specific to you which is provided to us through your use of our App (i.e. information that identifies you).

Liability

Although Comb Communications endeavours to ensure the system is secure and updated regularly, we cannot be held liable for any loss harm or damage suffered as a result of the use of the system or users who fall subject to hacking, data loss etc. We do not guarantee that the system will be available all the time or at any specific time, that access will be uninterrupted, that there will be no delays, failure, errors or omissions or loss of transmitted information. We reserve the right to modify the system at any time. We shall not be liable to you for any physical loss or damage as a result of your use of this computer or system. Comb Communications has taken all reasonable steps to reduce the risks of viruses and other interferences or vulnerabilities, but cannot certify that the system is immune to all viruses or defects and therefore does not accept any liability for any damage suffered or loss sustained as a result of any transmission, use of the system or its effect on or compromising of any

other systems and/or device. You have sole responsibility for adequate protection and back up of any data or information.

Limitation of Liability

The information contained on this website is given for general information and interest purposes only. Whilst we try and ensure the information contained on the website is accurate and up to date, we cannot be responsible for any inaccuracies in the information. As a result, you should not rely on this information, and we recommend that you take further advice or seek further guidance before taking any action based on the information contained on this website. Our liability to you as explained herein remains unaffected by this. We do not accept any liability for any acts or omissions resulting from your decision or opinion formed based on your use of the website. Use of this website is at your sole risk. We shall not be liable for any loss or damage whatsoever and howsoever arising as a result of your use of or reliance on the information contained on the website to the maximum extent permitted by law. We do not guarantee that this website will be compatible with all or any hardware and software which you may use. We do not guarantee that this website will be available all the time or at any specific time, that access will be uninterrupted, that there will be no delays, failure, errors or omissions or loss of transmitted information. We reserve the right to withdraw or modify this site at any time. We shall not be liable to you for any physical loss or damage to your computer as a result of your use of this website, including any damage arising as a result of a virus. You have sole responsibility for adequate protection and back up of data and/or equipment.

Disclaimer

We specifically state that the information contained on this website is intended exclusive for jurisdictions falling inside the Republic of South Africa, and any products or services offered on this website are intended for the Republic of South Africa only. Those who access this website do so on their own initiative and are therefore responsible for compliance with applicable local laws and regulations. By accessing each part of this website, the entrant has agreed that he/she has reviewed the website in its entirety including any legal or regulatory terms.

Severability

If any part of these terms and conditions is found by any court or other competent authority to be invalid, unlawful or unenforceable then such part shall be severed from the rest of the terms and conditions which shall continue to be valid and enforceable to the fullest extent permitted by law.

Access rights

You may request details of personal information, which we hold about you under South African legislation. If you think any information, we have about you is incorrect or incomplete, please write or e-mail us as soon as possible. We will correct or update any information as soon as possible.

Governing Law and jurisdiction

These terms and your use of our website are governed by and construed in accordance with laws of The Republic of South Africa and any disputes will be decided only by the courts of The Republic of South Africa.

Changes to this privacy policy

We reserve the right to update this privacy policy or any privacy notice at any time. Any changes we may make to this policy in the future will be posted on this page, so we recommend that you check this page from time to time to take policy of any changes we make, as they are binding on you if you provide us with information after such a change has been made. We may also notify you in other ways from time to time about the processing of your personal information.

Notices and Revisions

If you have any concern about privacy at the Company, please e-mail us a thorough description and we will try to resolve the issue for you. Our business changes constantly and our privacy policy and our website terms and conditions will also change from time to time. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our website frequently to see recent changes. Unless stated otherwise, our current privacy policy applies to all information that we have about you and your account. However, we stand behind the promises we make and will never materially change our policies and practices to make them less protective of member information collected in the past without the consent of affected members.