



PRIVACY POLICY

IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (POPI)

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1. Introduction

We recommend you read this Policy so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By providing us with your personal information, you acknowledge that you have reviewed the terms of this Policy (the “Policy”) and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to proceed and not to provide us with any personal information. This Policy forms part of our Terms and Conditions and such shall be governed by and construed in accordance with the laws of South Africa. This Policy

explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At CMA Info we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

2. Who We Are

CMA Info CC (hereinafter referred to as “CMA Info”), with registration number 2005/085875/23, is a South African-based company offering a web-based subscription to property information.

3. The Information We Collect

3.1 Collection of Personal Information

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

We source Personal Data from the public domain such as the Deeds Office, advertising as well subscribers.

Other additional sources would be statistical information such as Google Informatics.

We get information directly from business partners, suppliers, clients, site visitors and customers signing up to use our services and products.

There are various types of categories of information we gather including

Marketing – this is consumer, household, business non – personal information

Public records – census data, geographic data, property data form local authorities and recorded deeds office data.

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

We will ask you when we need information that personally identifies you (personal information) or allows us to contact you.

Examples of information we collect from you are

- Name;
- Address;
- ID Number.
- Copy of ID document for verification purposes only. Not retained;
- Company details including company name, registration number, physical/postal address and contact details;
- Email address;
- Telephone/Cell number;
- Company details.

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

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in a similar industry in order to offer you a more consistent and personalised experience in your interactions with CMA Info.

3.2 Collection of Non-Personal Information

We may automatically collect non-Personal Information 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 information and it is only used to assist us in providing an effective service on this website. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this website.

3.3 Cookies Policy

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On our website, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing related activities. A secondary type of cookie referred to as “user-input” cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved as a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser’s cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our Website's features.

Further information about managing cookies can be found in your browser's help file or through sites such as www.allaboutcookies.org.

Other third-party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identifies you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

By navigating on our web site or entering your login details to access areas reserved for registered users, you agree that we can place these cookies on your computer or internet enabled device.

4. How We Use Your Information and Access

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

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.
- For market research purposes.
- To assist with business development.
- For the detection and prevention of fraud, crime, 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.
- We will also use your Personal Information 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.
- For monitoring and auditing site usage.
- To evaluate the use of the site, products and services.
- To analyse the effectiveness of our advertisements, competitions and promotions.
- To 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.
- To make the site easier to use and to better tailor the site and our products to your interests and needs.
- To help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time.
- To collect information 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 Information so as to ensure that the site presents the best web experience for you.
- 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 suggest products or services (including those of relevant third parties) which we think may be of interest to you.
- To offer you the opportunity to take part in competitions or promotions.
- 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 information and means necessary to opt out.
- To respond to your queries or comments.
- Where we collect Personal Information 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 information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.

We occasionally hire other companies to provide limited services on our behalf, including packaging, mailing and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

5. Disclosure of Personal Information

We may disclose your Personal Information to our service providers 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 Information with, and obtain information about you from:

- third parties for the purposes listed above;
- other companies in a similar 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 information.

CMA Info will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- conform to the edicts of the law or comply with legal process served on CMA Info;
- protect and defend the rights or property of CMA Info, and,
- act in urgent circumstances to protect the personal safety of users CMA Info's Websites or the public.

6. Personal Information Security

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

Our security policies and procedures cover:

- physical security;
- computer and network security;
- access to Personal Information;
- secure communications;
- security in contracting out activities or functions;

- retention and disposal of information;
- acceptable usage of Personal Information;
- governance and regulatory issues;
- monitoring access and usage of private information;
- investigating and reacting to security incidents.

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

CMA Info has taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honoured. We take strong precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

Your personal information is never shared outside the company without your permission, except under conditions explained above. Inside the company, data is stored in password-controlled servers with limited access. Your information will be stored and processed in South Africa only.

Retention of Personal Information,

For historical referencing, accuracy, updating purposes and statistical purposes, we keep personal information for as long as necessary with regard to deeds office data, property data, employees, subscribers, enquiries and job candidates.

7. Access to your Personal Information

7.1 Your Right to Personal Information

You may request free of charge for CMA Info to confirm if it has personal information on you. The link to the "POPI Data Subject Request Form" is <https://www.cmainfo.co.za/privacy.aspx> Alternatively, you should complete POPIA Form 1 <https://www.cmainfo.co.za/Docs/Form-1-Objection%20to%20Processing.pdf>

We will take all reasonable steps to confirm your identity before providing any details regarding personal information.

7.2 Access to data

You further have the right to request a copy of the Personal Information we hold about you.

The link to the "POPI Data Subject Request Form" is <https://www.cmainfo.co.za/privacy.aspx>

Alternatively, to do this, you should complete POPIA Form 1 <https://www.cmainfo.co.za/Docs/Form-1-Objection%20to%20Processing.pdf>

We will take all reasonable steps to confirm your identity before providing any details regarding personal information.

In accordance with POPIA Section 23 (1)(b), CMA Info cc may charge a fee for providing this information

8. Correction of your Personal Information

You have the right to ask us to update, correct or delete your Personal Information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you.

8.1 Correct and or Update data

You may request your personal information be updated or corrected.

The link to the "POPI Data Subject Request Form" is <https://www.cmainfo.co.za/privacy.aspx>

Alternatively, please complete POPIA Form 2 <https://www.cmainfo.co.za/Docs/Form-2-Request%20Change%20or%20Delete.pdf>

We will then update this information should any of it be wrong.

8.2 Object to processing data

You may object to the processing of your personal information unless the processing of your personal information is in accordance with any lawful purpose

Any objection to the use of personal information. The link to the "POPI Data Subject Request Form" is <https://www.cmainfo.co.za/privacy.aspx>.

Alternatively, the objection should be submitted on POPIA Form 1 <https://www.cmainfo.co.za/Docs/Form-1-Objection%20to%20Processing.pdf>

We will take all reasonable steps to confirm your identity before providing any details regarding personal information.

We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up to date by notifying us of any changes we need to be aware of.

9. Definition of Personal Information

According to the POPI Act “**Personal Information**” means information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link: <https://www.gov.za/documents/protection-personal-information-act>

10. Changes to this Notice

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

11. How to Contact Us

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your Personal Information, please contact us by email at privacy@cmainfo.co.za. Be certain the words Privacy Policy are in the Subject line.

12. Additional Laws

We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected or to obtain access to your own information without having to use the request for access to information procedure in terms of Promotion of Access to Information Act, 2002 (“PAIA”). Any other information required will need to be obtained in accordance with the access to information procedure as set out in PAIA.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

Your attention is drawn to the definition of Personal Information contemplated in section 1 of POPI (as may be amended from time to time) and that you are permitted to make a complaint to the Information Regulator in the event of any interference with the protection of your Personal Information. The contact details of the Information Regulator are:

Complaints e-mail	:	complaints.IR@justice.gov.za
General enquiries e-mail	:	inforeg@justice.gov.za