

Our reference : Website Privacy Policy
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WEBSITE PRIVACY POLICY

A copy of this policy is published and updated on our website from time to time.

1. INTRODUCTION

LEGACY ENVIRONMENTAL MANAGEMENT CONSULTING (PTY) LTD (“we”) respect our users’ privacy and will not collect, use, store or distribute Personal Information without your permission.

This Privacy Policy sets out our commitment to protect your privacy and Personal Information, as well as our, and your various rights and obligations in this regard. By accessing and using our website, you agree to be legally bound by the provisions of this policy.

Please note that this Privacy Policy relates to your use of our website in general. We have also adopted a **Privacy Notice**, as well as a **PAIA manual** as part of our personal information protection compliance framework, relating more specifically to the processing of your Personal Information outside of the context of this website.

You can access the Privacy Notice by clicking on the following link: **Privacy Notice**

You can access the PAIA manual by clicking on the following link: **PAIA Manual**

2. BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

Any use of your Personal Information must be for a lawful purpose, which must be specified. In the case of our website, the Personal Information requested from you (e.g., your name, address, email, billing information, etc.) is necessary for the entering into and the performance of a lawful contract between us and you, under which terms, you may use and enjoy the website and our services. We may additionally use the information to promote our services within our subscription base and, with your express permission, may share it with third party or affiliate companies interested in marketing similar products to you.

3. PRIVACY AND SECURITY OF YOUR INFORMATION

We will process your information only on instructions from you and will maintain the confidentiality and security of such information in accordance with the standards required by law, which requires us to adopt reasonable safeguards to protect the integrity and confidentiality of such information from unauthorised access, loss or destruction, having due regard to generally accepted practices and procedures or any applicable industry specific rules or professional regulations.

Except as otherwise provided in this Privacy Policy, we will keep your Personal Information on secure servers. We may also provide you with the capability to transmit your Personal Information via secured and encrypted channels if you use a similarly equipped web browser.

We will not be liable to you, or any other person, in respect of any unauthorised loss, destruction, access, or processing of your information which occurs notwithstanding our adherence to the above-mentioned security measures.

We will not disclose your information to any person other than in the manner contemplated in this Privacy Policy. We may, however, disclose your information if we are legally required to do so in respect of an official investigation by a duly authorised organ of state in the performance of their mandate, or by order of a court or tribunal of competent jurisdiction. In such instances, we will notify you of such disclosure, unless we are legally precluded from doing so. You agree that we will not be liable to you, or any other person, as a result of such legally required disclosures.

4. TYPES AND USES OF INFORMATION COLLECTED

Information types

Traffic Data

We automatically track and collect the following categories of anonymous information when you visit our website, which does not personally identify you, but is helpful for marketing and security purposes:

- IP addresses
- Domain servers
- Types of computers accessing the website
- Types of web browsers used to access the website

We may also use “cookies” to customise content specific to your interests. This is done in a secure manner.

Personal Information

In order for you to access certain services that we offer via our website, we may require you to provide us with certain information that personally identifies you. Such information may include some or all of the following categories (examples are used for illustrative purposes only):

Information type	Examples
Contact information	Email address, telephone or cell phone number, physical or postal address, billing address
Geographical information	Your time zone or location
Demographic information	Your age and gender
Identification information	Your name, surname, identity or passport number, online username or alias

If you communicate with us, regardless of the method used, any information provided in such communication may constitute Personal Information. If you choose to participate in one of our optional activities or events on the website, the information asked for will be collected and retained by us for marketing purposes as described below.

Uses

Use by us

We use information submitted by you while using the website for the following specific purposes:

- To provide you with the information contained on the website.
- To render services, or sell products to you, as advertised on, or provided via the website.
- To advertise or promote further services to you, should you opt to receive such marketing material from us.
- Statistical and historic purposes, in which case the information is anonymised.
- Any legal process or dispute where we need to rely on such information in order to protect our rights.

Sharing of your information with third parties

We may share certain categories of information we collect from you with the following parties for the following purposes, to the extent that such information is reasonable, adequate and not excessive in relation to such purposes:

- Your information may be shared with our operators in relation to the functionality of the website and any products or services offered thereon, including, but not limited to, hosting, billing, payment facilitation, communications, data storage, backups and security.
- We may share some of your contact information with third parties who may want to market related services to you, but only if you authorised us to do so.

As required by law, we only share your Personal Information with operators where we have an express written agreement with them in which they warrant that they will treat your Personal Information subject to the same reasonable and appropriate security measures as we are required to adhere to, including breach notification provisions.

It may be necessary for your information to be transmitted to operators or third parties who are situated in another country. In such instances, we will only do so if such operator or third party is subject to laws that require the same or a similar level of reasonable information security as is required from us; or where our agreement with them does so; or where they are subject to corporate binding rules requiring them to do so.

Location and Retention of Personal Information

Unless otherwise expressed herein, the Personal Information that we collect will be kept on our web server and any backup thereof and will be retained only for as long as is necessary to render services to you, which may include contacting you for marketing purposes or providing your information to third parties for marketing purposes, if you have provided your consent. We may also be legally required, in terms of relevant tax, anti-terrorism, anti-money laundering and other legislation to retain certain categories of your information for periods of time prescribed in such legislation. Information that is retained for statistical or historical purposes will be anonymised.

Your Personal Information may be retained or transferred to any new entity with which we merge or amalgamate, or to which we transfer or sell our business.

5. BREACH NOTIFICATION

If we become aware of any breach of security which may potentially lead to unauthorised access, loss, destruction or processing of your Personal Information, we will, as soon as is reasonably possible, investigate the matter and notify you and other affected parties, as well as the Information Regulator of such breach, in the prescribed manner and form, and will take reasonable steps to mitigate against any risks resulting from such breach.

Please note that no data breach notification made by us will constitute an admission of any liability in respect of any matter referred to in such notice.

6. YOUR RIGHTS

You may choose not to provide us with any Personal Information. In such an event, you may still access and use the website, although this may result in limited functionality, and we cannot necessarily provide all of our products or services to you.

You may choose not to allow us to share your Personal Information with third parties for marketing purposes. We will ask you to opt-in to this, but you may remove your consent at any time.

If we already hold some of your Personal Information, you may request access to it, or request us to rectify, update, or delete such information at any time. Some of these functions may be done directly from your account page on our website. If this is not possible, you may do so by way of a written request to Kim@legacyemc.co.za.

You furthermore have the right to object to our holding of your Personal Information, on the basis that we do not have authorisation to do so, or to withdraw our authorisation. You may do so by written request to Kim@legacyemc.co.za.

7. INFORMATION OFFICER

We have appointed an Information Officer, whose role is to regularly monitor and maintain the systems and processes relating to our compliance with the information security and other legal requirements.

8. INFORMATION PROVIDED BY YOU ON BEHALF OF THIRD PARTIES, INCLUDING CHILDREN

Where you provide information to us which constitutes Personal Information of a third party, including children, you warrant that you have the legal authority to do so, and you indemnify us against any claim of any nature by any person arising from any lack of such authority on your part.

Our website is intended for a general audience, and we do not direct any of our content specifically at children. We understand and are committed to respecting the sensitive nature of children's privacy online. If we learn or have reason to suspect that a user of our website is under the age of 18, we may delete their user account, including any Personal Information associated with that account, unless we are provided with express authorisation by their parent or legal guardian.

9. PUBLIC INFORMATION

The website may contain links to third party websites. We are not responsible for the privacy practices or the content of such websites. We may also make chat rooms, forums, message boards, and news groups available to you. Any information that you voluntarily disclose on these media becomes public information and is not our responsibility.

10. COMPLAINTS

Complaints relating to our processing of your Personal Information may be directed to the office of the Information Regulator in the prescribed manner and form. The Information Regulator's contact details may be found on its website which, at the date of publication of this Privacy Policy, is located at <http://www.justice.gov.za/infoereg/>.

11. AMENDMENTS TO THIS POLICY

We reserve to amend, update or modify this Privacy Policy at any time by publishing it on the website and without any further notice to you. Any such amendment will be effective immediately upon publication on the website.

12. OUR CONTACT DETAILS

Should you have any questions regarding our information collection, handling or storage processes, please contact us at:

Information Officer: Kim Pontac

Email: Kim@legacyemc.co.za