

We are committed to store the personal information you provide us securely, to remove personal information we may have acquired without consent, respond efficiently to any enquiries relating to personal information and report breaches or loss of personal data both to regulators and individuals.

Please feel free to contact our Information Officer, Thilana Wendt, if you have any queries regarding our Privacy Policy by email to thilana@progalv.co.za or call her on 021 945 1803.

Please see the following technical information about what data is collected and how it is processed:

1. Introduction

- 1.1. In adopting this Privacy Policy, we wish to balance our legitimate business interests when collecting and using your information and your reasonable expectation of privacy. In this respect, we will take all reasonable steps to prevent unauthorised access to your personal information.
- 1.2. We implement appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in our possession or under our control, in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"). These measures are designed to prevent loss of, damage to, or unauthorised access to personal information. While we continuously review and enhance our security practices, the nature of electronic communications means that there are inherent risks in the transmission and storage of information.
- 1.3. By continuing to use our website, or any of our services you agree and are deemed to accept the terms and conditions of this Privacy Policy.
- 1.4. You also agree and accept that we may collect, process and/or store your personal information (as defined in the ECT Act) provided by you if you enter your details in the online contact form.

2. Collection of Usage Data

- 2.1. Usage Data is collected automatically when using our website through tracking cookies like Google Analytics and Facebook Pixel, however, this information collected passively using various technologies is strictly for statistical purposes and to determine the visitor traffic patterns through our website and cannot be used by us to specifically identify you or extract personal information.
- 2.2. Google Analytics data may include information such as your browser type, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- 2.3. When you access our website through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data. We may also collect information that your browser sends whenever you visit our website or when you access our website by or through a mobile device.

3. What Personal Information is Collected

- 3.1. Only the details you provide by entering your information into the online contact form. This information normally includes your name, email address, contact number and occasionally your website address.
- 3.2. By entering your personal information into the online contact forms, you consent to provide us with your details we will use to send you the appropriate information required for you to use our products or services.
- 3.3 We process personal information such as name, surname, address, email address, telephone number, and banking details
4. How Your Personal Information is Used
 - 4.1. The primary goal in collecting your personal information is to provide you with a better customer experience, which may include, interactive communications, online shopping and other services.
 - 4.2. Your personal information may be used to:
 - 4.2.1. To contact you by email, telephone calls, or other equivalent forms of electronic communication, regarding quotations, updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
 - 4.2.2. To provide you with general information about our company like important events such as website downtime, business closure dates during holidays or important news and updates.
 - 4.2.3. To attend and manage your requests to us.
5. With whom is your information shared?
 - 5.1. Your personal information will never be shared with any third-party organisations to be used for direct marketing purposes.
 - 5.2. Your personal information may also be shared under the following circumstances:
 - 5.3. If we need to create accounts for products or services and they need to be registered in your name.
 - 5.4. Where the law requires that we disclose your personal information in special cases, where we have reason to believe that such disclosure is necessary to identify, contact or bring legal action against a party.
 - 5.5. Online Payments to make a purchase from our website, the information obtained during the checkout process including tracking information, cookies, credit card number and contact information is provided to the payment gateway and where required, the delivery company.
 - 5.6. Occasionally we may need to use third-party providers like MailChimp for the purposes of sending you marketing-related announcements related to the products or services available by us on our website or general information like season's greetings or new-year special offers. You may at any time opt out of receiving such marketing-relating announcements.

6. What are Cookies And How are They Used?

- 6.1. Cookies are pieces of information that a website transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving your preferences and tracking your online habits, traffic patterns, and making sure you do not see the same advertisement too often. These files do not contain personal data, but they do contain a personal identifier allowing some websites to associate your personal data with a certain device. The use of cookies is an industry standard.
- 6.2. We do not extract personal information from cookies nor are we affiliated with any marketing company that uses services to match identifiers with personal information.
- 6.3. We may place a "cookie" on your browser to store and sometimes track information about you and the use of our website.
- 6.4. While most browsers are initially set up to accept cookies, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. Please, note that some parts of our website will not function properly if you refuse cookies. You may occasionally get cookies from third party advertisers. We do not control these third-party cookies. The use of advertising cookies sent by third-party advertisers is an industry standard.

7. The Types of Cookies We Use

- 7.1. We use different types of cookies on our website. These cookies may be deleted from your device at different times, such as at the end of your browsing session (when you leave the website) or after a pre-set amount of time, or they may persist on your device until you delete them.
- 7.2. We use the following types of cookies on our website:
- 7.3. Essential cookies – these are cookies that allow our website to perform its essential functions. Without these cookies, some parts of our websites would stop working.
- 7.4. Site analytics cookies – these are cookies that monitor how our website is performing, and how you interact with it. We use them to know how best to improve our website or services.
- 7.5. Functional cookies – these are cookies that remember who you are as a user of our website. We use them to remember any preferences you may have selected on our website, like saving your username and password or settings.

8. Security of Personal Information

- 8.1. We have put in place appropriate security measures to prevent your data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information on a business need-to-know basis, and subject to a duty of confidentiality.

9. E-Mail

- 9.1. We use email as the primary method of communication, and we will respond your online contact request or direct contact request via email on the address you provided.

10. Children's Privacy

- 10.1. Our website does not address anyone under the age of 18 ("Children"). We do not knowingly collect Personal Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us and we will remove it. If we become aware that we have collected Personal Information from children without verification of parental consent, we take steps to remove that information from our servers.

11. Retention of Data

- 11.1. We will retain your Personal Information which is collected only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.
- 11.2. We will also retain Non-Personal Information for internal analysis purposes.

12. Your rights & retention of records

- 12.1. We keep most of your personal information while we still have a purpose, we need to provide you with services or where we are legally obligated to do so. We will also keep your information where you have agreed for us to do so or have given your consent that we are allowed to do so. We keep some of your information even after our business relationship has terminated, if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information. You have rights in connection with your personal information. In certain circumstances, by law, you have the right to:

Request access to your information: You will be able to ask us what information we have about you as well as ask for a copy of this information. This should be done on request to our information officer. There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy it might be done at a certain fee, which will also be communicated to you at the time of your query.

Change or correct information: You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Delete information: You can ask us to delete or remove personal information under certain circumstances.

Object to processing: You can do this where we are relying on your legitimate interest, public interest, or our legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes or where you have given your consent for the specific processing, and you want to retract your consent. Retracting your consent does not invalidate the information we lawfully processed while we had your consent to do so.

Request the restriction of processing: You can ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.

13. Privacy Laws

13.1. The use of our website and any electronic transaction concluded with us are governed by the laws of the Republic of South Africa. If any user accesses our website from locations outside of the Republic of South Africa, that user is responsible for compliance with all local laws.

14. Changes to the Privacy Policy

14.1. Changes to the privacy notice apply to your use of our services. We may modify this privacy notice from time to time, as required by changes in legislation. You acknowledge that your continued use of our services after we publish our changes to this privacy notice means that the collection, use, and sharing of your personal information is subject to the updated privacy Policy.

14.2. Please review this Privacy Policy periodically and especially before you provide any Personal Information to us.

INFORMATION REGULATORS CONTACT DETAILS

You have the right to lodge a complaint with the South African Information Regulator. See the Information Regulator contact details below.

ADDRESS: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
COMPLAINTS: POPIAComplaints@inforegulator.org.za PAIAComplaints@infoforegulator.org.za
GENERAL QUERIES: enquiries@infoforegulator.org.za