

Introduction

First Technology Investments (Pty) Ltd and its affiliates (collectively “First Technology”, “us”, and “we”) is committed to respecting the privacy of your personal data and to providing you with the best possible IT solution whilst still maintaining the integrity of any information you may share with us.

To demonstrate our commitment, First Technology has created this privacy statement in order to communicate its intent to provide effective processes for the appropriate handling of such private information and to comply with applicable legislation that governs the authentication, protection and disclosure of personal information. By procuring any IT related hardware, software, services and/or solutions (“services and/or products”) from First Technology, you consent to the use of your personal identifiable information within the scope of the data practices described in this statement.

For purposes of this privacy statement, personal information is that as defined in the Protection of Personal Information Act 4 of 2013, or more simply any information that can be used to personally identify an individual, for example your name and surname, contact details, address and country of residence.

Our legal grounds for processing your personal data

Your local law may require us to set out in this privacy statement the legal grounds on which we rely in order to process your personal information. In such cases, we rely on one or more of the following processing conditions:

- our legitimate interests in the effective delivery of information and services to you and in the effective and lawful operation of our businesses and the legitimate interests of our clients in receiving professional services from us as part of running their organisation (provided these do not interfere with your rights);
- our legitimate interests in developing and improving our businesses, services and offerings and in developing new First Technology technologies and offerings (provided these do not interfere with your rights);
- to satisfy any requirement of law, regulation or professional body of which we are a member (for example, for some of our services, we have a legal obligation to provide the service in a certain way);
- to perform our obligations under a contractual arrangement with you; or
- where no other processing condition is available, if you have agreed to us processing your personal information for the relevant purpose.

The use of Cookies

We may store some information (commonly known as "cookies") on your computer when you visit our web site. This enables us to recognise you during subsequent visits. The type of information gathered is non-personal, such as:

- the IP address of your computer;
- the date and time of your visit;
- which pages you browsed;
- whether the pages have been delivered successfully.

Apart from merely establishing basic connectivity and communications, First Technology may also use this data in aggregate form to develop customised services - tailored to your individual interests and needs. Should you choose to do so, it is possible (depending on the browser you are using), to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This may however cause certain features of the web site not to be accessible.

Third Party Providers

We may transfer or disclose the personal data we collect to third party contractors, subcontractors, and/or their subsidiaries and affiliates. Third parties support the First Technology network in providing its services and help provide, run and manage IT systems. Examples of third-party contractors we use are providers of identity management, website hosting and management, data analysis, data backup, security and cloud storage services.

Any third parties with whom we share personal data are contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

Other disclosures

We may also disclose personal information under the following circumstances:

- with professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide;
- when explicitly requested by you;

- when required to deliver publications or reference materials requested by you;
- when required to facilitate conferences or events hosted by a third party;
- to law enforcement, regulatory and other government agencies and to professional bodies, as required by and/or in accordance with applicable law or regulation. First Technology may also review and use your personal information to determine whether disclosure is required or permitted.

First Technology may share data with trusted partners to help us perform statistical analysis, send you an email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to First Technology, and they are contractually obligated to maintain the confidentiality of your information.

First Technology does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

Security

First Technology has implemented technology, policies and processes aimed at protecting the confidentiality, integrity and availability of your personal information. We update and refine these measures on an on-going basis. However, First Technology cannot be responsible for the privacy policies and practices of other web sites you may access using links from First Technology web sites.

We recommend that you check the policy of each web site you visit and that you contact that specific organisation if you have any concerns or questions regarding their privacy policies and practices. Please be aware that internet communications are inherently not secure unless they have been encrypted. Your communications may be routed through any number of countries before reaching our web site. First Technology therefore assumes no responsibility or liability of any nature whatsoever for the interception or loss of personal information beyond our control.

Your legal rights in relation to personal data

In particular, you may have a legal right to:

- obtain confirmation as to whether we process personal data about you, receive a copy of your personal data and obtain certain other information about how and why we process your personal data;
- the right to request for your personal data to be amended or rectified where it is inaccurate (for example, if you change your address) and to have incomplete personal data completed;
- the right to delete your personal data in the following cases:
 - the personal data is no longer necessary in relation to the purposes for which they were collected and processed;

- our legal ground for processing is consent, you withdraw consent and we have no other lawful basis for the processing;
 - our legal ground for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to the processing and we do not have overriding legitimate grounds;
 - you object to processing for direct marketing purposes;
 - your personal data has been unlawfully processed; or
 - your personal data must be erased to comply with a legal obligation to which we are subject.
- the right to restrict personal data processing in the following cases:
 - for a period enabling us to verify the accuracy of personal data where you contested the accuracy of the personal data;
 - your personal data have been unlawfully processed and you request restriction of processing instead of deletion;
 - your personal data are no longer necessary in relation to the purposes for which they were collected and processed but the personal data is required by you to establish, exercise or defend legal claims; or
 - for a period enabling us to verify whether the legitimate grounds relied on by us override your interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.
 - the right to object to the processing of your personal data in the following cases:
 - our legal ground for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or
 - our processing is for direct marketing purposes.
 - the right to withdraw consent:
 - where we process personal data based on consent, individuals have a right to withdraw consent at any time.

Consent to receive direct marketing

By submitting your details, you hereby give consent to First Technology, its Original Equipment Manufacturers and their duly appointed affiliates, agents to process your personal information as provided, for the purposes of direct marketing in respect of information and communications technology related goods and services.



You understand that your data will be used solely for the purposes for which it was provided. You understand that you can at any time unsubscribe, should you choose to do so, through the link provided to you in the marketing email.