

ECHOTEL GROUP

PRIVACY POLICY

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1. Introduction

- Echotel (Pty) Ltd and its affiliates (collectively referred to as “Echo”, “us” and “we”) understand the importance of protecting your personal information and are committed to protecting your right to privacy.
- This Privacy Policy describes what information we collect, how we use it, and your rights in this regard, and it applies to any information we collect from you throughout your oral or written engagements with us, in terms of which we may be required to collect personal information from you or from third parties including, without limitation, your use of our websites, social media sites, applications, customer portals and any related services, emails, surveys, sales, marketing or events (“Sites”).
- Sites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Echo does not control these third-party websites and is not responsible for their privacy statements.
- Kindly read this Privacy Policy carefully, as it will assist you in making informed decisions about sharing your personal information with us.
- By using or accessing the Sites and using our services, you are deemed to have accepted, and consent to, the terms of this Privacy Policy and the information collection and usage thereof as is set out in this Privacy Policy.

2. Purpose

The Purpose of this Privacy Policy is to provide you with information as to how Echo collects and processes your personal data and information through your use of our Sites. This Privacy Policy must be read in conjunction with any other privacy policies or fair processing policies we may provide to you from time-to-time in relation to your usage of Echo Sites.

3. The data and information we collect about you

For the purposes of this Privacy Policy, personal information is information that can be used alone or in combination to uniquely identify you, and may include:

- **Identity information** including, your name and surname, identity documents/number, company details, job title, company registration, gender, marital status, title, dates of birth, incorporation/registration documents etc.
- **Contact information** including, physical address, mailing address, e-mail address, physical addresses, telephone numbers etc.
- **Transactional information** including, log-in and account access information, details about service orders and payments to and from you and other details of products and services you purchase from us.
- **Financial information** including, bank account information, VAT registration number, tax reference numbers etc.



- **Technical information** including, IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website or customer portal.
- **Profile information** including, your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage data** including the number and frequency of users to each web page, how visitors and subscribers use and navigate websites as well as how long you use our website.
- **Marketing and Communications Data** including your preferences in receiving marketing from Echo and Echo's suppliers or third parties as well as your communication preferences.
- We do not collect any special forms of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), without your consent. Where you access our offices, special personal information (closed circuit television) may be collected by the video monitoring system to record all activities for incident investigation, crime prevention, public safety and to comply with contractual obligations.
- We may also collect other information that does not personally identify you.
- You may choose not to provide personal information to us when requested. However, if the information is required by law, or otherwise is necessary for us to provide you with our solutions and services, we may be unable to provide our services to you.

4. How we collect your personal data/information

We may collect your personal information in the following ways:

- **Interactions with us.**

When you communicate with us, verbally or in writing, or when we communicate with you, you may be required to provide us with your personal information or information which is collected by us which includes, without limitation, when you fill in forms; apply for our products or services or request a quotation for services; register for workshops or seminars; consent to feasibility studies being conducted; request information using contact forms; subscribe to our service or publications; request marketing information to be sent to you; log support requests; subscribe to our mailing lists; give us feedback or contact us; and/or apply for a job with us.

- **Automated technologies or interactions.**

When you use, or interact with, our Sites and customer portal, we may collect information and technical data about you through use of cookies and similar technologies. In this regard, we may automatically collect technical data about your equipment, browsing actions and patterns, through the use of cookies, server logs and/or other similar technologies.



- **From third party sources.**

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms, as well as from other third parties. Examples of the information we receive from other sources include social media profile information (your name, gender, birthday, email, location, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

5. Use and disclosure of your personal information

Most commonly, we may collect, store and use your personal information in order to, without limitation:

- process orders or applications for our products and/or services;
 - process and verify requests for products and services and to compile quotations and proposals, or otherwise for purposes for which you specifically provide the information;
 - improve your experience on our website;
 - responding to your queries, concerns and/or complaints;
 - perform services or deliver products to you;
 - perform administrative and business functions and internal reporting;
 - update our records and keep contact details up to date;
 - recruiting staff (including, carrying out background checks and processes for vetting of job applicants);
 - carry out credit checks;
 - debt collections or legal processes; and/or
 - fulfil legal and contractual obligations
- In using your personal information in accordance with the above, we may be required, to the extent that it is necessary, to share your personal information with certain third parties, including, without limitation, affiliates, subsidiaries, partners, vendors/suppliers, sub-contractors or agents; credit bureaus, banks or financial institutions; attorneys or debt collection agencies; Echo's employees, agents and consultants;
 - We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
 - Echo may be required to share your personal information across South African borders with its affiliates and subsidiaries and/or suppliers in order to provision products and services to you.



6. Security of your personal information

- Echo is committed to protecting your personal information from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure.
- Although we cannot guarantee the absolute security of your personal information, we take all reasonable steps or measures to keep said information secure. In this regard, we have implemented appropriate and reasonable technology, policies and processes aimed at protecting the confidentiality and integrity of your personal information.
- Kindly be advised that internet communications are insecure unless they have been encrypted and/or appropriate security safeguards have been implemented. As a result, Echo is not liable for any interception or loss of personal information beyond Echo's reasonable control.

7. Children's privacy

Please note that the Sites and services are not intended for children and we do not knowingly collect any data or information relating to children.

8. Deletion of, and access to personal information

- You may request that we delete any of your personal information provided that you have finalised your relationship with us. We will retain and use your personal information for as long as is necessary to comply with our legal and business obligations, resolve disputes and enforce this policy.
- You may request access or an update to your personal information that we hold by sending an email to info@echosp.co.za.
- You may opt out of receiving marketing materials from us at any time and manage your communication preferences by following the unsubscribe instructions included in each marketing email from us or emailing us at info@echosp.co.za.
- If you believe that our records of your personal information is outdated or incorrect, kindly notify us to correct same as soon as is practicable.
- You may request access any personal information in our possession in accordance with the PAIA manual on our website.

9. Cookies

- Echo may sometimes use cookies which are packets of data that a website receives and saves on a computer/mobile device when a person visits the website. Cookies enable the website to record the website



user's actions and preferences so that the said user does not need to re-enter the details whenever he/she/they reuses the website or a specific page thereof.

- It is not necessary for cookies to be enabled, however, enabling them will provide the user with a better browsing experience.
- You are able to delete or block cookies through you web browser settings, however this may prevent certain features from working on the website. The Help function within your browser should tell you how to restrict or block cookies.
- We may use cookies to enable certain functions of our services and to provide analytics and we may be required to collect, store and use this information in order to compile non-personal statistical information about browsing habits, click-patterns and access to Echo's online services.
- We do not use functionality or advertising cookies.

10. Updates to this Privacy Policy

We may update this Privacy Policy at any time in our sole discretion. The revised Privacy Policy will be posted on our website together with the revision date. We kindly request that you regularly review this Privacy Policy to stay informed about our privacy practices.

11. How to contact us

- If you have any questions about how your personal data is handled by Echo, you have a privacy concern or you wish to make a request or a complaint relating to your personal information, please send an email to info@echosp.co.za
- You have the right to make a complaint at any time to the Information Regulator – South Africa's supervisory authority for data protection issues at <http://www.justice.gov.za/infoereg/>. We would, however, appreciate the chance to deal with your concerns before you approach the Information Regulator and would advise that you contact us in the first instance.

