

DUXBURY

Networking

DUXBURY TRANSMISSION EQUIPMENT (PTY) LIMITED trading as DUXBURY NETWORKING PRIVACY POLICY

A. Definitions and Introduction.

Definitions

Unless defined otherwise elsewhere in this Privacy Policy, the below shall be interpreted as:

- **"We", "us", "our" or "Duxbury"** refers to **DUXBURY TRANSMISSION EQUIPMENT (PTY) LIMITED** trading as Duxbury Networking, with registration Number 2018/441897/07 a duly incorporated company in terms of the Laws of the Republic of South Africa, with its principal place of business at Block 1, Riviera Office Park, 66 Oxford Rd, Parktown, Johannesburg, 2193.
- **"You" and "your"** refers to you as a client, and / or user of our website, and / or the reader of this document who can be regarded as a "data subject".
- **"Your personal information"** refers to all personal information Duxbury has on you, or data subjects which are related to you or under your authority ("other data subjects") (as relevant) which information relates to the name, health, gender, age, contact numbers and addresses of such data subject or any information that can identify you.
- **"Processing of information"** means the automated or manual activity of collecting, recording, organising, storing, updating, distributing, and removing or deleting your personal information.
- **"Privacy Policy"** means this document.
- **"PIPS"** refers to Personal Information Processing Systems, which systems are used by Duxbury to process your personal information, such as, but not limited to, our website, telephone facilities, and data capturing systems.
- **"our website"** means <http://www.duxbury.co.za>.

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1. We respect your privacy, and we will take all reasonable measures to protect it.
2. The Privacy Policy, amongst other things, describes the processing of your personal information by Duxbury, the use thereof, who we share it with, and your choices and rights in relation to your personal information.
3. From the outset we inform you that you have the right to object to the processing of your personal information. By engaging and interacting with us through all our forums, you voluntarily accept the Privacy Policy and in doing so, you agree to the processing of information and to be bound by the terms of the Privacy Policy. If you do not accept the terms of the Privacy Policy, we cannot engage you any further and you cannot make use of our services, products, or our website.
4. You are entitled to withdraw your consent for the processing of your personal information, or amend, check, or correct such processed personal information by sending us an email on privacy@duxnet.co.za completing the necessary instructions in accordance with your intention.

B. How we process your personal information.

We may process your personal information from you in a variety of ways when you engage and interact with us, including:

1. inserting your personal information to make some form of request to Duxbury.
2. entering a competition or participating in a promotion.
3. when asked for your name, address and e-mail address and any other relevant information about you necessary to complete your request.
4. when calling us, we may collect your Calling Line Identification Number (CLI), and monitor your calls to better address your requested needs.
5. when you access our website, or interact with us in any other way, or use our products and services.
6. when placing an order with us for our products or services – you create an account with us, we process your orders and payment transactions, perform administrative and business functions, market our products and services to you, or subscribe you to our mailing lists and newsletters.
7. when you apply for employment with us.
8. from third party sources when engaging on public databases, social media sites, or business affiliates; or
9. using cookies and similar technologies on our website.

C. The Personal Information we process.

Depending on how you engage and interact with us, the personal information we process may include details of:

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1. your name.
2. your email address.
3. your postal address.
4. your telephone number.
5. your account information.
6. your gender.

D. The Purpose of processing your personal information.

Your personal information is processed in order to;

1. ensure and confirm that the products and services ordered by you have been received by you, and that our products and services are effective for you.
2. validate you as a data subject when using our products, services, website and calling our offices.
3. prevent and detect criminal activity, fraud, and misuse of or damage to our website or networks.
4. prosecute those responsible for criminal activity, fraud, and misuse of or damage to our website or networks.
5. contact you to invite you to form part of our consumer panel or various research groups or market certain of our latest products and services.
6. for purposes of management, research, analysis, corporate reporting, credit scoring, affordability assessment, and improving business efficiencies.
7. protect your vital commercial and contractual interests; or
8. comply with a legal obligation placed on Duxbury.

E. Disclosing your personal information to third parties.

We may provide aggregate statistics about our sales, customers, traffic patterns and other website information to third parties, but these statistics will not include any information that could identify you. As such, your continued engagement with Duxbury denotes your consent to Duxbury to share your personal information to third parties.

We also provide your personal information to:

1. our affiliates, subsidiaries and suppliers for purposes already outlined above.
2. affiliated business partners with whom we offer co-branded services or engage in joint marketing activities with; and/or
3. service providers to provide operational services or facilitate transactions on our behalf, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, client support, email delivery, data analytics and auditing.

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We also recognise other instances in which we may be required to share your personal information in compliance with a directive of a competent authority in accordance with, or required by any applicable legislation, regulation, or legal process. These instances may, but not limited to, be.

1. where it is necessary to comply with judicial proceedings, court orders or government orders; or
2. to protect the rights, property or safety of Duxbury, its business partners, you, or others, or as otherwise required by applicable law.

While Duxbury attempts to ensure that third parties with whom personal information is shared with have implemented appropriate data protection and security measures to protect your personal information and are not permitted to use your personal information for any purpose other than the purpose for which they are provided, Duxbury does not warrant against any damage or loss which may result because of a third party's inadequate and inappropriate data protection and security measures.

F. How long we retain your personal information.

The time periods for which we retain your personal information may vary according to the use or purpose attached to the information. Unless there is a specific legal requirement requiring us to keep your information, we will however not keep it for longer than the purpose for which the information was processed or for which it is to be processed.

In considering the period within which to retain personal information, we factor in the following:

1. whether we are under a legal, contractual, or other obligation to retain personal data, or as part of an investigation or for litigation purposes.
2. whether personal information is needed to maintain accurate business and financial records.
3. whether there are automated means to enable you to access and delete your personal information at any time.
4. whether the personal information is sensitive personal information in which event we will generally retain this for a shorter period, or
5. whether you have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal data in line with your consent.

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G. Securing your Personal Information.

1. We make all reasonable effort to keep our Personal Information Processing Systems ("PIPS") always secure. These PIPS are reviewed and monitored on an ongoing basis. We are committed to protecting your personal information from accidental or unlawful destruction, loss, alteration, unauthorised access, or disclosure. We use a combination of physical, administrative, and technical safeguards to achieve our commitment in this regard. However, we advise that we cannot guarantee the security of any personal information provided to or processed by us. Accordingly, we cannot be held responsible for any loss or unauthorised use, or interception of personal information transmitted or processed via our PIPS.
2. Our website may contain links to other websites outside of our control. We are not responsible for and make no representations or warranties in relation to the content, privacy, or security of these other third-party controlled websites. You engage third party websites solely at your own risk. Your use of such websites and applications is subject to the applicable third-party privacy policy.
3. Subject to the provisions above, Duxbury has implemented the appropriate technical and organisational security measures which are required to protect all Personal Information and related data which it holds from and / or against unauthorised access, accidental or wilful manipulation, loss, or destruction.
4. In the event of any breaches to our PIPS we undertake to act as soon as reasonably possible to engage and notify you and the relevant authorities as required by law.

H. Transborder Information Flows.

Duxbury may, for purposes outlined above, engage in business activities with third parties who are situated in a foreign country. By your engagement and interaction with us, you consent to us transferring your personal information to the third parties who are situated in a foreign country.

I. Where and When do we use cookies.

We allocate cookies during your engagement with us on our website. These cookies are designed to hold information collected during such engagement on our website and will allow us to recognise you as a user on our website, and should the need arise, provide you with the services you require. We use cookies to assist us with activities such as:

1. enabling you to sign into any products or functionalities we offer online.
2. authenticating you.
3. keeping track of the information you have provided to us.
4. improving your browsing experience.

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- 5 customising our interactions with you.
- 6 storing and managing your preferences and settings.
7. compiling statistical data.
8. analysing the performance and usability of the products or functionalities we offer online.
9. measuring traffic patterns on our website; and
- 10 determining which areas of our website have been visited.

Cookies collect information that your browser sends to our website including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your computer hardware/software or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

Our website may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your activities across our website to help us compile aggregated statistics.

J. How you can refuse or opt-out of cookies

Most browsers are set by default to accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance and to prompt you every time a cookie is sent to you or to allow you to choose not to receive cookies at all.

K. How we Market our Products and Services.

By placing orders resulting from promotions or advertisements Duxbury may have on occasion for its products, you are also automatically agreeing to receive by electronic means our Promotion and Marketing Notifications as well as our general newsletter. You may opt-out of these newsletters and Notifications at any time by following the details on our privacy policy. Opting out of these newsletters after purchase will not affect the value of the products and services which you have purchased.

You may opt out of receiving these newsletters and Notification at each instance you receive such newsletter and Notification by following the "unsubscribe" prompt at the bottom of the newsletter and Notification.

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L. Revision of Privacy Policy

Duxbury reserve the right to and may from time to time update this Privacy Policy. Any such revision will be published as an amended version on our website.

Change to this Privacy Policy will be posted as an updated version and readers are advised to visit and re-read the Privacy Policy on a regular basis and whenever they visit our website or engage with us.

M. Personal data accessibility.

Any data subject who can positively identify themselves is entitled to access their personal information held by us. A data subject has the right to correct or amend any of their personal information that may be inaccurate, misleading, or out of date on reasonable grounds. Duxbury shall take all reasonable steps to confirm the data subject's identity before providing details of the personal information or amendments thereof. Data held by us will be made accessible to the data subject, in the following circumstances:

- where disclosure is under compulsion of law
- where there is a duty to the public to disclose
- where the interest of the company require disclosure; and
- where disclosure is made with express or implied consent of the customer

Such a request may be directed to the Information Officer's email privacy@duxnet.co.za

N. Contacting us.

All comments, questions, concerns or complaints regarding your personal data or this policy should be forwarded to:

Physical address: 66 Oxford Road
Riviera Office Park, Block 1
Riviera
Johannesburg
2193

Position: Information Officer

Email: privacy@duxnet.co.za

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