

PRIVACY POLICY AND INFORMATION NOTICE FOR WEBSITE USERS South Africa (ZA)

Dedalus Group attaches a great deal of importance to and intends to pay particular attention to protecting your personal information and respecting your privacy.

The aim of this privacy policy and information notice for website users (hereinafter referred to as the "notice") is therefore to inform you of how your personal information is processed when you visit the website www.dedalus.com (hereinafter referred to as the "[site](#)").

In this regard, please note that Faranani acts as the responsible party for your personal information (hereinafter referred to as "[we](#)", "[us](#)" and "[our](#)").

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WHAT PERSONAL DATA DO WE COLLECT?

When you browse our site, we may collect the following categories of personal information about you:

- identification data (e.g., surname, first name, email address, username, password, Region, type of device).
- professional data (e.g., position held, field of activity, employer).
- technical data (e.g., IP address, type of browser used, etc.); and
- any personal information contained in any correspondence you send to us.

Provision of your personal information is voluntary, but we will be unable to provide you with the services and information you request without it. For example, if you contact us through the site, you will need to provide us with your email address so that we can respond to you.

In any case, we will inform you when it is mandatory to provide your personal data.

Additionally, if you provide us with personal information belonging to third parties, you undertake to ensure that such persons have been duly informed of the processing of their personal information in accordance with this policy and, if required, have consented to the processing of their personal data.

The table below outlines the purposes that we process your personal information for and, for each purpose, the legal basis for the processing operation in question:

PURPOSES	LEGAL BASIS
Responding to requests and questions you may submit through the site, and more broadly, managing our relationship with visitors to the site.	The processing is carried out to provide you with the service you requested from us.
Improving our services and our site.	The processing is carried out pursuant to our legitimate interest, which involves optimizing our tools and solutions to best accommodate our site visitors, clients, and prospects.
Complying with legal and regulatory obligations applicable to us.	The processing is necessary to comply with the legal obligations that we are subject to (for e.g. the publication of our <i>Promotion of Access to Information Act</i> No 2 (PAIA) PAIA Manual).
Managing any potential or actual disputes with you or third parties.	The processing is carried out pursuant to our legitimate interest, which involves defending our interests, including through legal action.
Sending, and receiving both automated (e.g., email, SMS, MMS, etc.) and non-automated messages (e.g., phone, ordinary mail, etc.), e.g. marketing messages and promotional content messages relating to our activities, products and services, and those of the other Dedalus group companies (including market research, customer satisfaction surveys, information about webinars and events) (marketing)	The processing is carried out only where you provide specific consent.

Sharing your personal information to the other Dedalus group companies established in your country/region, to allow them to send you, automated messages (e.g., email, SMS, MMS, etc.) e.g. marketing messages and promotional content messages relating to their activities, products and services (including market research, customer satisfaction surveys, information about webinars and events) (sharing for marketing purposes)	The processing is carried out only in case you provide specific consent
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In any case, please note that we will not process your personal information for any other purpose that is incompatible with the above-mentioned purposes.

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WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In the context of our processing operations, we may disclose your personal information to the following recipients:

- to our service providers, suppliers, agents, and contractors, to the extent that they assist us in carrying out the purposes set out in this policy (e.g., we use IT service providers to host your personal information on our behalf).
- the other entities of the Dedalus Group.
- to competent courts, public authorities, government agencies and law enforcement agencies (including where we are required to comply with legal or regulatory requests).

Regardless of the recipient, we will only disclose your personal information to them on a strictly need-to-know basis and only to the extent required to fulfill the purposes identified in this policy.

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DO WE TRANSFER DATA OUTSIDE SOUTH AFRICA?

Yes, it is probable that your personal information will be transferred outside South Africa, because we are a global company and our business operations are international. Should your personal information be transferred outside South Africa ("**ZA**"), we ensure that the level of protection your personal information is given is not adversely affected by such transfers.

In connection with the processing operations described in this policy, we may transfer your personal information outside the South Africa ("**ZA**"), including to countries that are not generally recognized as providing an adequate level of data protection.

This specifically means that each of the intended transfers is based on one of the following mechanisms at least:

- the provision of an adequate level of protection for the processing of personal information as referred to in section 72 of POPI; or, alternatively;
- the conclusion of binding corporate rules or binding agreements which provide an adequate level of protection that effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information in the Republic of South Africa, including the standard contractual clauses reproducing the models adopted by the European Commission; or, alternatively;
- the existence of an exemption related to one of the specific situations exhaustively provided for in Applicable Data Protection Laws (e.g. where you have given your consent to such transfer having been informed of the absence of safeguards, where the transfer is necessary for the performance of a contract concluded between you and us, where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party, or where the transfer is necessary for the establishment, exercise or defense of our legal claims, where it is not reasonably practicable to obtain your consent and where if it was practical you would be likely to give consent etc.).

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HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We store your personal information for no longer than is necessary for the purpose of the processing concerned.

In other words, this means that the storage periods we apply vary depending on the purpose for which we process the data in question. The table below therefore indicates, for each purpose, the storage period that will be applied to your personal data:

PURPOSES	STORAGE PERIOD
Responding to requests and questions you may submit through the site, and more broadly, managing our relationship with visitors to the site.	We will store your personal information for a maximum of 3 years from our last contact with you.
Improving our services and our site.	We will store your data for a maximum of one year, although in most cases your data will be aggregated shortly after collection into non-identifiable statistics.
Complying with legal and regulatory obligations applicable to us.	We store your personal information for as long as the relevant legal or regulatory obligations require. Without prejudice to different terms, 7 years – Business and Companies Act

Managing any potential or actual disputes with you or third parties.	Your personal information will be stored until all potential remedies have been exhausted.
Sending, and receiving both automated (e.g. email, SMS, MMS, etc.) and non-automated (e.g. phone, ordinary mail, etc.) means, marketing messages and promotional content messages relating to our activities, products and services and those of the other Dedalus group companies (including market research, customer satisfaction surveys, information about webinars and events) (marketing)	We will process your personal information until your consent is withdrawn and retain records for as long as the relevant legal or regulatory obligations require.
Sharing your personal information with the other Dedalus group companies established in your country/region , to allow them to send you, using automated messages (e.g. email, SMS, MMS, etc.) marketing messages and promotional content messages relating to their activities, products and services (including market research, customer satisfaction surveys, information about webinars and events) (sharing for marketing purposes)	We will process your personal information until your consent is withdrawn.

Commented [LF1]: @Dedalus internal instructions:
Please confirm the scope of the purpose. Should the personal information can be send outside ZA to other Dedalus entities, please amend it accordingly.

We have also defined an archiving policy. This ensures that your personal information is not stored in the active database unnecessarily.

In any case, once the applicable storage period has elapsed, we will irrevocably erase or anonymize your personal information so that you can no longer be identified.

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DO WE USE COOKIES?

We use cookies on our site.

To find out more about the cookies we use and the purposes that we use them for, please refer to our cookie policy, which can be found here: XXXXXXXXX

Commented [LF2]: @Dedalus internal instructions:
Please insert the link to the cookie policy

In accordance with the applicable data protection legal framework, particularly POPI and PAIA, you have the following rights as a data subject:

- a) to be notified that personal information about you is being collected as provided for in terms of section 18 POPI; or your personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22 POPI;
- b) to establish whether a responsible party holds personal information of that data subject and to request access to your personal information as provided for in terms of section 23 POPI;
- c) to request, where necessary, the correction, destruction or deletion of your personal information as provided for in terms of section 24 POPI;
- d) to object, on reasonable grounds relating to your particular situation to the processing of your personal information as provided for in terms of section 11(3)(a) POPI;
- e) to object to the processing of your personal information at any time for purposes of direct marketing in terms of section 11(3)(b) POPI; or in terms of section 69(3)(c) POPI;
- f) not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69(1) POPI;
- g) not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of such person as provided for in terms of section 71 POPI;
- h) to submit a complaint to the Regulator (<https://www.justice.gov.za/infoereg/index.html>; Email address: infoereg@justice.gov.za) regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74 POPI; and
- i) to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information as provided for in section 99 POPI.

However, please note that some of the above rights are subject to specific conditions dictated by the applicable data protection legal framework. So, in the event that your specific situation does not meet these conditions, we will unfortunately be unable to comply with your request.

To exercise your rights, please contact our information officer using the contact details provided in Section 8 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or assist in locating the personal information that forms the subject matter of your request.

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HOW CAN YOU CONTACT US?

If you have any questions or requests regarding our processing operations with your personal information under this policy, including exercising your rights, as outlined above, you may contact us on the following address: ~~XXXXXX~~

We also have appointed an information officer ("IO"), which you can contact by e-mail at the following address: dpo.group@dedalus.eu

Commented [LF3]: @dedalus internal instructions:
Please insert the link of the competent/marketing office entitled to receive the requests coming from website users.

Current version: Dedalus – Privacy policy and Information notice for website visitors – v. [1]

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