

## WEBPAGE PRIVACY POLICY

We are committed to protecting your Personal Information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your Personal Information, please contact us at [info@aspring.co.za](mailto:info@aspring.co.za).

This Privacy Policy governs the privacy policies and practices of our Website. Please read our Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us. We last updated our Privacy Policy on INSERT DATE.

### Information we collect:

As a Visitor, you can browse our Website to find out more about us, our services and experience. You are not required to provide us with any Personal Information as a visitor. We collect your Personal Information when you choose to use the "Contact Us" feature to express an interest in obtaining information about us or our services or to enquire about any information on our Website.

We ask for First Name, Last Name, Email Address, physical address and/or Mobile Number. If you Contact Us, you may also voluntarily share information related to you or your business. Generally, you control the type of information you provide to us when using our Website. The Personal Information that we collect depends on the context of your interaction with us and the Website, the choices you make and the products and features you use.

### The Personal Information we collect can include the following:

**Automatically collected information:** When you use our Website, we automatically collect certain computer information by the interaction of your mobile phone or web browser with our Website. Such information is typically considered non-personal information.

**Cookies:** Our Website uses "Cookies" to identify the areas of our Website that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalise the Content that you see on our Website. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our Website correctly or at all. We never place Personally Identifiable Information in Cookies.

**Third-party tracking tools:** We also use third party tracking tools to improve the performance and features of our Website. These third-party tracking tools are designed to collect only non-personal information about your use of our Website. However, you can understand that such tools are created and managed by parties outside our control. As such, we are not responsible for what information is captured by such third parties or how such third parties use and protect that information.

**Log information:** We automatically receive information from your web browser or mobile device. This information includes the name of the website from which you entered our Website, if any, as well as the name of the website to which you're headed when you leave our website. This information also includes the IP address of your computer/proxy server that you use to access the Internet, your Internet Website provider name, web browser type, type of mobile device, and computer operating system. We use all of this information to analyse trends among our Users to help improve our Website. We use the information we receive from you as follows:

- To allow us to make contact based on the query you submit under "Contact Us".
- To customising our Website for your experience. We may use the information you provide to us along with any computer information we receive to customise our Website.

- For data aggregation purposes. We retain the right to collect and use any non-personal information collected from your use of our Website and aggregate such data for internal analytics that improve our Website and Service as well as for use or resale to others. At no time is your Personally Identifiable Information included in such data aggregations.

Transfer of your personal information: Your information, including Personal Information, may be transferred to, and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other Personal Information.

Disclosure of your personal information: If we are involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy. Under certain circumstances, we may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Retention of your personal information: We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with the applicable laws), resolve disputes, and enforce our legal agreements and policies. Information regarding your data protection rights: Under the Protection of Personal Information (POPI) and the General Data Protection Regulation (GDPR) we are a Data Controller of your Personal Information. If you are from the European Economic Area (EEA) or South Africa Area (RSA), our legal basis for collecting and using your Personal Information, as described in this Privacy Policy, depends on the information we collect and the specific context in which we collect it. We may process your personal information because:

- We need to perform a contract with you, such as when you choose to engage with us for our services;
- You have given us permission to do so;
- The processing is in our legitimate interests and it's not overridden by your rights;
- For payment processing purposes;
- To comply with the law;
- If you are a resident of the European Economic Area (EEA) or South Africa Area (RSA), you have certain data protection rights. In certain circumstances, you have the following data protection rights;
  - The right to access, update or to delete the Personal Information we have on you;
  - The right of rectification;
  - The right to object;
  - The right of restriction;
  - The right to data portability; and
  - The right to withdraw consent.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local Data Protection Authority in the European Economic Area (EEA) or South Africa Area (RSA).

**Service providers:** We may work with third-party companies and individuals to facilitate our Website (“Service Providers”), to provide our Website on our behalf, to perform Website-related services or to assist us in analysing how our Website is used. These third-parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

**Analytics:** Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

**Links to third-party websites:** Our Website may contain links to other websites that are not under our direct control. These websites may have their own policies regarding privacy. We have no control of or responsibility for linked websites and provide these links solely for the convenience and information of our visitors. You access such linked Websites at your own risk. These websites are not subject to this Privacy Policy. You should check the privacy policies, if any, of those individual websites to see how the operators of those third-party websites will utilise your personal information. In addition, these websites may contain a link to Websites of our affiliates. The websites of our affiliates are not subject to this Privacy Policy, and you should check their individual privacy policies to see how the operators of such websites will utilise your Personal Information.

**Our email policy:** We, as well as our affiliates, fully comply with national laws regarding SPAM. You can always opt out of receipt of further email correspondence from us and/or our affiliates. We agree that we will not sell, rent, or trade your email address to any unaffiliated third-party without your permission.

**Updates to our privacy policy:** We reserve the right to modify this Privacy Policy at any time. If we make material changes to this policy, we may notify you on our Website, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the “Last Updated” date at the beginning of this Privacy Policy. Any changes we make to our Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies. If you have any questions about our Privacy Practices or this Policy, please contact us.