

THE PROTECTION OF PERSONAL INFORMATION ACT 4 of 2013
Privacy Policy

DEFINITION OF PERSONAL INFORMATION

According to the Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act also includes the following items as personal information, which will be collected by Refirement Network cc:

Name and Surname,
Email address,
Date of birth,
Telephone number,
Occupation
Personal questions of working history.

ABOUT THE COMPANY

The Refirement Network is a niche business involved in helping organisations and individuals 50+ to understand the opportunities and challenges that the future holds.

Services include:

- Strategy,
- Communication,
- Workshops,
- Coaching,
- Education,
- Entrepreneurship, and
- Community.

At Refirement Network cc we have taken the corrective steps to draft a private policy to respect your privacy regarding any information we may collect while operating our website. This privacy policy applies to (hereinafter, "us", "we", or "you").

We respect your privacy and are committed to protecting personally identifiable information you may provide us through our website. We have adopted this privacy policy to explain what information may be collected on our website, how we use this information, and under what circumstances we may disclose the information to third parties.

This privacy policy applies only to information we collect through the website and does not apply to our collection of information from other sources.

This privacy policy, together with the terms and conditions posted on our website, set forth the general rules and regulations governing your use of our website. Depending on your activities when visiting our website, you may be required to agree to additional terms and conditions.

We regularly review our compliance with this Privacy Policy and whenever we receive a formal complaint, we will make best efforts to contact the person who made the complaint to attempt to resolve his or her concerns. If you have any concerns about the use of your information, or the contents of this Privacy Policy, please feel free to contact us.

Collection of Information

Information Automatically Collected

When you visit the Websites we may passively collect information from you and store that information on our one drive, including your internet protocol address ("IP address"), browser type, operating system, device identifier, device model, software version, or mobile or ISP carrier information. We also use Cookies and other technologies to collect information about your visit to the Websites, such as the date and time of your visit, the information you searched to find the Websites, or your activity on the Websites. "Cookies" are small files which may be stored on your computer during your use of the Websites and contain data about your use of the Websites. We may use session Cookies (which expire when you close your browser) or persistent Cookies (which stay on your computer until you delete them) to understand more about your activity on the Websites or on other websites.

Information Collected from Other Sources

We may collect or receive information about you from other sources with which you interact (e.g., Facebook), companies that are our partners, or other third parties to update or supplement the information that you provide or that we collect automatically. We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

Our Combination of Your Information

We may combine the information we receive from and about you, via the Websites and from third parties, to help us tailor our communications to you and to improve the Websites.

How We Use Your Information

Refirement Network cc may use the information that we collect from and about you to:

- Provide our services, including the set up of appointments.
- Verify your identity.
- As otherwise described at the point of collection or for purposes which you expressly permit us to use the information.

Refirement Network cc also may use de-identified information in an aggregated or anonymized manner to help us analyse the use of the Websites. This Privacy Policy does not limit our use or disclosure of de-identified information, and we reserve the right to use and disclose such information to our partners, advertisers, and other third parties at our discretion. We will retain your personal information for as long as necessary to provide you with the services through the Websites or to otherwise administer and maintain the services and our Websites.

How We Disclose Your Information

Refirement Network cc may share your information with other entities or individuals in the following circumstances:

- **Select Partners and Affiliates:** We may share your information with our select partners and affiliates that we believe may have offers of interest to you.
- **Service Providers:** We may share your information with our service providers that provide business, professional, or technical support functions for us. These service providers are only provided access to your information to the extent necessary to process your information and/or provide services to Refirement Network cc, and may not use or share your information for any other purposes. Refirement Network cc may disclose limited information about you to Service Providers to serve relevant advertising on third party platforms to you or to other audiences. If you do not want Refirement Network cc to disclose your information to Service Providers (including affiliated third parties which may not share the Refirement Network cc name) for their direct marketing or any other purpose, you may opt out of such disclosure by contacting us as per details on the website.
- **Your Employer:** We may share your information with your employer, if the employer is paying for your Course (information disclosed in this case shall include Course performance information, unless otherwise expressly agreed in writing with Refirement Network cc).
- **Legal Matters; Safety:** We may access or share your information to satisfy any applicable law, regulation, legal process, or governmental request; in connection with an investigation on matters related to public safety; as permitted by law; or otherwise as required by law. We may disclose your information to protect the security of the Course, the Websites, servers, network systems, and databases. We also may disclose your information as necessary if we believe that there has been a violation of our Terms of Use (including investigation of potential violations thereof), any other legal document or contract related to the Websites, or the rights of any third party.
- **Fraud; Security:** We may access and disclose your information to detect, prevent, or otherwise address fraud, security or other technical issues.
- **Consent; Other:** We may share information with third parties when we have your consent, or otherwise as described to you at the point of collection.
- **De-Identified Aggregate or Anonymous Information:** Refirement Network cc may also share de-identified aggregate or anonymous information with third parties for their marketing or analytics uses. For example, we provide Google Analytics with de-identified data so that they may provide us with a better understanding of visitors' interactions with the Websites, including actions a visitor takes while accessing the Websites or sites to which a visitor navigates after leaving the Websites. [Learn more about Google Analytics' use of de-identified data](#), and how to opt out of such use with a browser add-on, [here](#)

Information Security and Data Retention

We are committed to protecting the security of your information. We maintain what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure your information and to prevent unauthorized access, maintain accuracy, and ensure appropriate use of your information. The accuracy, safety, and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Websites, you are responsible for keeping this password confidential. We ask that you not share your password with anyone. Even though we do our best to protect your information, the transmission of information via the internet is not completely secure, and we cannot guarantee our security measures. We are not responsible for any unauthorized access to or acquisition of your information.

We will retain your personal information for as long as necessary to provide you with the services through the Website or to otherwise administer and maintain the services and our Website.

Your Rights Regarding Your Personal Information

You may access and/or update your personal information through your user profile. In some instances, you may have the right to (a) request that Refirement Network cc export a full listing of your personal information in a commonly used electronic form (b) withdraw your consent to Refirement Network cc to process your personal information; and (c) request that Refirement Network cc restrict the processing of or delete your personal information. Certain personal information, however, is necessary for us to provide information to you about the Course or to provide services to you through the Websites or otherwise.

If you choose not to provide this personal information or request that Refirement Network cc delete or restrict the processing of this personal information, you may not be able to participate in the Course, and we may not be able to provide you with other services, including those provided through the Websites or advertised about the Course.

If you believe these rights regarding your personal information have been infringed upon, please contact us as set forth in the “Additional Information” section. You also have a right to lodge a complaint with data protection authorities.

To the extent the above rights apply in your country, they may be limited in some situations, for example, if Refirement Network cc is under a legal requirement to retain certain information. If you wish to make a request described in this paragraph, or if you are otherwise unable to access and/or edit your personal information through your user profile, you may contact us.

ADDITIONAL INFORMATION

Education Records

If you would like to inspect and review your education records, you may submit a request through our contact page. Requests for access will receive a response within 45 days, although certain records may be excluded from education records made available for inspection (within the bounds of the law and our confidentiality undertakings with third parties). You may also request amendment of records that you believe are inaccurate, misleading or in violation of your rights.

Third-Party Content, Links, and Plug-Ins

The Websites may also offer you the ability to interact with social plugins from social media sites, which may allow us and/or the social media site to receive data from or about you, to better understand who is using the Websites, how people are using the Websites, how to improve the effectiveness of the Websites, our services and related content, to help us or those third parties serve more targeted advertising to you across the Internet, and to allow “Like” buttons and “Share” buttons to work. In some cases, we may know that you clicked on a social plugin, such as a Twitter Follow button, or receive other information from the social media sites. Similarly, if you have previously provided personal information to a third party operating a plug-in on our Websites, then such third party may recognize you on our Websites. Your use of social network plugins is subject to each social media site’s privacy policy, which may be different from ours. As with linked websites, we have no control over the information that is collected, stored, or used by social network plugins.

THE GENERAL DATA PROTECTION REGULATIONS (GDPR)

The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in the European Union (EU).

Our international clients will be regulated by the rules and regulations set by the GDPR and/or by their Data protection act according to their country.

Our obligation is to ensure that your information is protected by following and familiarising with the rules and regulations set from an international guideline.

Changes to This Policy

We review our privacy practices from time to time and reserve the right to make changes to this Privacy Policy at any time. If we do make changes, we will give notice via the Website features or by emailing you. We recommend that you check the contents of the Privacy Policy whenever you have any new questions about privacy and our use of data, referring to the date of the last amendment listed at the bottom of the Privacy Policy.

HOW TO CONTACT US

If you have any queries about this notice, you need further information about our privacy practices, wish to withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website.

Compliance to the Protection of Personal Information Act 4 of 2013 (POPIA), also known as the POPI Act, will be mandatory for organisations in South Africa.

Whilst the focus of the POPI Act is on compliance, our approach is to implement compliance in such a way that it delivers business value, so that it does not become a cost center, or overhead, but rather allows for improvements in efficiencies and effectiveness, done in such a way as to meet the compliance requirements.

REFIREMENT NETWORK CCONSULTING COOKIE POLICY

Please read the following carefully to understand how Refirement Network cc “we”, or “us”) uses Cookies when you visit our websites (“Sites”). By using or accessing our Sites, you agree to this Cookie Policy. This Cookie Policy may change from time to time and your continued use of the Sites is deemed to be acceptance of such changes. Please check this Cookie Policy periodically for updates.

What are Cookies?

Cookies, pixel tags and similar technologies (collectively "Cookies") are files containing small amounts of information which are stored by your browser on any Internet-enabled device – such as your computer, smart phone, or tablet – when you visit a website. Most web pages contain elements from

multiple web domains so when you visit our Sites, your browser may receive Cookies from several sources.

Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies do lots of different and useful jobs, such as remembering your actions and preferences (such as login, language, font size and other display preferences), distinguishing you from other users of the Sites, generally improving your online experience, and helping us to offer you the best product and services. We use Cookies and other technologies to ensure visitors to our Sites have the best possible experience and to provide targeted advertising. There are many different types of Cookies. For a detailed list of Cookies used on our Sites, please refer to the section below on What types of Cookies do we use?

How you can control or delete Cookies

We provide you with several ways to manage Cookies:

- You can refuse to provide your consent to our collection of non-essential Cookies;
- You can disable first- or third-party Cookies by use of your browser settings;

Our performance, functionality and targeting/advertising Cookies are not strictly necessary for the Sites to work but will provide you with a better browsing experience. You can delete or block these Cookies, but if you do this, you may have to manually adjust some preferences every time you visit the Sites and some features of the Sites may not work as intended. For example, you may not be able to visit certain areas of the Sites or you may not receive personalized information when you visit our Sites.

Control via your browser settings

Most internet browsers are initially set up to automatically accept Cookies. If you do not want our website to store Cookies on your computer or device, you can change or adjust your browser or device settings to block Cookies or to alert you when Cookies are being sent to your device.

If you use different devices to view and access our Sites (e.g. your computer, smartphone, tablet, etc.) you will need to ensure that each browser on each device is adjusted to suit your Cookie preferences. The procedures for changing your settings and Cookies differ from browser to browser. If necessary, use the help function on your browser or click on one of the links below to go directly to the user manual for your browser.

Additional Mechanisms for Exercising Choice

We, or other parties we do business with, may place or recognize unique Cookies or other technologies placed on your browser when you visit our Sites to collect information about your use of the website and your other online activities over time and across different websites and apps, and may use that information to serve interest-based advertisements to you as you browse the Internet. To learn more about your choices for receiving interest-based advertising or to opt-out.

Strictly Necessary Cookies

Strictly Necessary Cookies are necessary for the operation of our Sites. These Cookies are essential in helping you to move around our Sites and use the features, such as accessing secure areas of the Sites or using the shopping basket.

For example, we may use Strictly Necessary Cookies to:

- Remember the goods and services you selected when you get to the payment page
- Identify you as being logged into the Sites
- Provide access to protected areas of a Sites
- Remember previously entered text so it is not lost if the page refreshes

Performance Cookies

Performance Cookies simply help us improve the way our Sites work. We utilize these Cookies to analyse how our visitors use our Sites and to monitor our site performance. They tell us how people use each page, which ones are most commonly viewed, or whether any errors occurred. This allows us to provide a high-quality experience and quickly identify then fix any issues that arise.

For example, we may use Performance Necessary Cookies to:

- Store preferences to see which method of linking between pages is most effective
- Enable web analytics to provide anonymous statistics on how our Sites are used
- To assist with error management in helping us improve the Sites by measuring any errors that occur
- Monitor ad response rates and determine the effectiveness of our ads

Functionality Cookies

We use Functionality Cookies to allow us to remember your preferences. For example, we may use Functionality Cookies to:

- Remember settings you have applied such as layout, colours, font sizes and page backgrounds.
- Remember if we have already asked you if you want to fill in a survey
- Detect if you have already seen a pop-up to ensure it doesn't get shown to you again
- Process a request from a user to submit a comment or blog or forum post

Targeting Cookies

Targeting Cookies help make sure that the ads you see on our Sites are relevant to you and your interests. Targeting Cookies may also be placed on your device by our third-party service providers

that remember you have visited the site in order to provide you with ads more relevant to you. We may use Targeting Cookies to:

- Collect information about browser habits to target advertising
- Collect information about browser habits to target site content
- Provide links to social networks
- Provide advertising agencies with information on your visit so that they can present you with advertisements you may be interested in.

Many of the Cookies placed through our Sites are session Cookies, while others are persistent Cookies, and some are “first-party” Cookies, while others are “third-party” Cookies.

- **First-party Cookies** are those set by a site that is being visited by the user at the time
- **Third-party Cookies** are Cookies that are set by a domain other than that of the site being visited by the user. If a user visits a site and another entity sets a cookie through that site, this would be a third-party cookie.
- **Persistent Cookies** are Cookies that remain on a user’s device for the period of time specified in the cookie. They are activated each time that the user visits the site that created that particular cookie.
- **Session Cookies** are Cookies that allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session Cookies are created temporarily. Once you close the browser, all session Cookies are deleted.

Google Analytics Cookies Our Sites use Google Analytics Cookies, which monitor traffic levels, search queries and visits to our Sites. These Cookies enable Google to determine whether you are a return visitor to the site and to track the pages that you visit during your session. For more information about Google Analytics Cookies, please see [Google's privacy policy](#). Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). If you want to opt out of Google Analytics, you can download and install [Google’s add-on for your web browser](#).

Questions/Contact Us

If you have any questions or concerns regarding this Cookie Policy.