



Privacy Policy

Privacy Policy¹

We are committed to safeguarding the privacy of our website visitors; this policy² sets out how we will treat your personal information.³

Our website uses cookies. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. / By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

(1) Credit

This document was created using an [SEQ Legal](#) template.

(2) What information do we collect?

We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation
- (b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services
- (c) information that you provide to us for the purpose of registering with us
- [(d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters
- (e) any other information that you choose to send to us;
- [(f) *other information.*]⁴

[Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with the terms of this privacy policy.]

[(3) Cookies⁵

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use "session" cookies and "persistent" cookies on the website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We will use the session cookies to: keep track of you whilst you navigate the website; keep track of items in your shopping basket; prevent fraud and increase website security; and *other uses*. We will use the persistent cookies to: enable our website to recognise you when you visit; keep track of your preferences in relation to your use of our website; and *other uses*.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer (version 9) you can refuse all cookies by clicking "Tools", "Internet options", "Privacy", and selecting "Block All Cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

(4) Using your personal information

Personal information submitted to us via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- [(a) administer the website;]
- [(b) improve your browsing experience by personalising the website;]
- [(c) enable your use of the services available on the website;]
- [(d) send you goods purchased via the website, and supply to you services purchased via the website;
- [(e) send statements and invoices to you, and collect payments from you;
- [(f) send you general (non-marketing) commercial communications;
- [(g) send you email notifications which you have specifically requested;
- [(h) send you our newsletter and other marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (and you can inform us at any time if you no longer require marketing communications);]⁶
- [(i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- [(j) deal with enquiries and complaints made by or about you relating to the website;
- [(k) keep the website secure and prevent fraud;
- [(l) verify compliance with the terms and conditions governing the use of the website (including monitoring private messages sent through our website private

⁶ As a general rule, where you plan to use personal information you have collected for the purpose of direct marketing, this should be made clear on the page where the information is collected, and you should ensure that this only happens if users opt in to the marketing (eg "Click here if you would like us to send you information by email about products which we think will interest you."). There are, however, exceptions to this general rule. There are also rules about the content of direct marketing communications. If you are in any doubt about complying with your legal obligations in relation to direct marketing, you should seek professional advice.

messaging service); and

Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.⁷

Your privacy settings can be used to limit the publication of your information on the website. You can adjust your privacy settings by [*describe how*].

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.⁸

(5) Disclosures

We may disclose your personal information to any of our employees, officers, agents, suppliers or subcontractors] insofar as reasonably necessary for the purposes set out in this privacy policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- [(d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- [(e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

(6) International data transfers⁹

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

in addition, personal information that you submit for publication on the website will be published on the internet and may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

(7) Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

All electronic transactions entered into via the website will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and other login details confidential. We will not ask you for your password (except when you log in to the website for registration purposes).

(8) Policy amendments¹⁰

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

(9) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the supply of appropriate evidence of your identity [(for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)].

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes[, by sending an email to us]. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

(10) Third party websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

(11) Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated.

(12) Contact

If you have any questions about this privacy policy or our treatment of your personal

¹⁰ Changes to the policy – in particular as to permissible uses of personal data – may not be retrospective. In other words, if you collect personal information on one basis, you cannot, simply by changing the terms of your policy, go on to legitimately use that information on a different basis.

information, please write to us by email to info@icta.co.za

(13) Data controller

The data controller responsible in respect of the information collected on this website is Human Capital Business Solutions ICT Academy.

END