



# **CRIMSON MOON TRADING CC T/A BLAZE INTERNET**

Company Registration Number :2011/091229/23

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## **CRIMSON MOON TRADING CC T/A BLAZE INTERNET (hereinafter referred to as the “Company”) Privacy Policy**

### **1. Introduction**

The Company understands the importance of protecting your personal information and we value and respect it.

This Privacy Policy describes how the Company collects and uses your personal information, with whom we share it, and your choices and rights in relation to your personal information.

It applies to personal information that we collect from you physically or in a borderless digital environment during your interactions with us, whether on line, including through our websites (including mobile sites), social media sites and mobile applications (collectively “Internet Services”) that link to this Privacy Statement, in writing or orally or personal information that we may collect off line or receive from third parties.

### **2. Personal Information we collect**

The Company is subject to the Protection of Personal Information Act, No 4 of 2013 (“POPIA”) of which the operative provisions came into effect on the 1<sup>st</sup> of July 2020. Public and Private bodies have until the 1<sup>st</sup> of July 2021 to be fully compliant.

“Personal Information” is defined in POPIA as information relating to an identifiable, living natural person and where it is applicable an identifiable existing juristic person, including but not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views or preferences of the person;

- Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Depending on how you interact with us, personal information we collect may include but without limitation:

- Your name
- Your email address
- Your postal address
- Your telephone numbers
- Your log-in and account information for authentication purposes and account access
- Your gender
- Your social media account information

We may also collect other information that does not personally identify you. Such other information includes browser and device information, website and application usage data, IP Address, demographic information such as marketing preferences, geographic location, home language, and information collected through cookies and other technologies or information that has been anonymized or aggregated. If we link this information with your personal information, we will treat such linked information as personal information.

The Company may also where applicable be subject to the General Data Protection Regulations 2016/679 of the European Union which is primary legislation dealing with the protection and regulation of information. If you are a natural person based in the EU who wish to have procured products of services offered by the Company and in the process, you have provided us with personal information in order to process your enquiry and or transaction or contract we will supplement our obligations as set us herein with additional aspects of the GDPR where appropriate and applicable some of which are referred to under section 10.

The Company may also where applicable be subject to the Data Protection Act 2018 and the UK General Data Protection Regulation of the United Kingdom which is the primary legislation dealing with the protection and regulation of personal information for the citizens of the UK. If you are a natural person based in the UK, who wish to or have procured products or services from the Company and in the process, you have provided us with your personal information in order to process your enquiry and or transaction or contract we will supplement our obligations as set out herein with additional aspects of the UK GDPR where appropriate and applicable some of which are referred under Section 10.

### **3. How we collect your personal information**

We may collect your personal information from you in a variety of ways when you interact with us including:

- We collect personal information when you place orders for our solutions, products and services you create an account with us, we process your orders and payment transactions perform administrative and business functions, market our solutions, products and services to you when you register for our seminars or subscribe to our mailing lists and newsletters.

- When you communicate with us and we collect personal information when we respond to your inquiries and requests obtain feedback from you about our solutions products and services you apply for employment with us.
- From third party sources and we collect personal information from third parties, including public databases, social media sites, business partners with whom we offer co-branded services or engage in joint marketing activities and third parties that provide list of similar services.

When you use our Internet Services, we may and third parties we engage may automatically collect data including personal information through the use of cookies and similar technologies. For more information see the cookies and similar technologies section below.

#### **4. Legal basis for processing your personal information**

When we process your personal information in connection with the purposes set out in this privacy statement, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of the relationship with you:

- Our legitimate interests (or those of a third party with whom we share your personal information) for the purpose of managing, operating or promoting our business, including direct marketing, and transfers within the Company of personal information for business and administrative purposes except where such interests are overridden by your interest or fundamental rights or freedoms which require protection of personal information.
- Where this is necessary to comply with a legal obligation on us, whether contractually or otherwise.
- To protect the vital interests of any individual.
- Where you have consented for such processing to take place.

#### **5. Use of your personal information**

We may use your personal information to:

- Enable you to effectively use and to improve our solutions, products and services for example to:
- Perform administrative and business functions and internal reporting.
- Send administrative information to you.
- Inform you about and provide you with our products, services and solutions
- Update our records and keep your contact details up to date.

We engage in these activities to manage our contractual relationship with you to comply with our legal obligations or for our legitimate business interests:

- Provide you with marketing materials and to personalize your experience with us for example to send marketing communications to you, enable you to subscribe to newsletters and mailing lists and to enable you to register for seminars if applicable.

#### **6. Your rights as a data subject**

As a data subject you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information as referred to in Chapter 3 of POPIA, including the right to-

- To be notified that –

- Personal information about you is being collected as provided in terms of section 18 or your personal information has been accessed or acquired by an unauthorized person as provided in terms of section 22.
- To establish whether a responsible party holds personal information of you and to request access to your personal information for in terms of section 23.
- To request where necessary the correction, destruction of your personal information as provided for in terms of section 24.
- 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).
- To object to the processing of your personal information-  
At any time for purposes of direct marketing in terms of section 11 (3) (b) or in terms of section 69 (3) (c).
- 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).
- 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 you as provided for in terms of section 71.
- To submit a complaint to the Regulator regarding the alleged interference with the protection of your personal information as a 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 and to institute proceedings regarding the alleged interference with the protection of your personal information as provided for in section 99.

All references to sections above are in terms of sections of POPIA.

## **7. Sharing your personal information**

We may share your personal information for the purposes set out in this Privacy statement:

- With our subsidiaries for the purposes set out in this privacy statement. The Company is the party responsible for the management of the jointly used personal information
- With business partners with whom we offer co- branded services or joint marketing activities.
- With service providers to provide operational services for facilitate transactions on our behalf including but not limited to processing or orders, assisting with sales related activities or post sales support, client support, email.
- Where applicable for credit references, fraud prevention or business scoring agencies or other credit scoring agencies.
- For debt collecting agencies or other debt recovery organizations
- For other legal reasons:
- We may share your personal information in respect to a request for information by a competent authority in accordance with or required by an applicable law, regulation or legal process.

- Where necessary to comply with judicial proceedings, court orders or government orders or to protect the rights, property or safety of the Company its business partners, you or others or as otherwise required by applicable law.

Any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.

## **8. Security of your personal information**

The Company is committed to protecting your personal information from accidental or unlawful destruction, damage, loss, alteration, unauthorized access or disclosure by using reasonable, appropriate, physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same.

## **9. Cross border transfers**

The Company may be required to fulfill its contractual obligations with you outside of South Africa and may transfer your personal information to countries where we do business or to international organizations in connection with the purposes identified above and in accordance with this privacy statement.

## **10. Your rights under data protection laws in the European Union and the United Kingdom**

The Company adheres to applicable data protection laws in the EU and UK which provide you with certain rights relating to personal information, subject to legal exceptions and your rights include:

- The right to access personal information that we hold about you.
- The right to rectify inaccurate personal information we hold about you without undue delay and considering the purpose of the processing to have incomplete personal information about you completed.
- The right to ask us to erase your personal information without undue delay in certain circumstances.
- The right to restrict the processing of your personal information to certain circumstances.
- The right to receive your personal information from us in a structured commonly used and machine-readable format and to transmit your personal information to a third party without obstruction in certain circumstances.
- Where we process personal information based on your consent you have the right to withdraw your consent at any time for future processing.
- Where we process your personal information based upon our legitimate interests or those of a third party you have the right to object to the processing of your personal information at any time.
- Where we process your personal information for direct marketing purposes you have the right to object to processing of your personal information at any time including profiling to the extent that it is related to such direct marketing.
- The right not to be subject to a decision based solely on automated processing including profiling which produces legal effects concerning you or similarly significantly affects you.

You may lodge a complaint with the EU's on-line complaint procedure (<https://ec.europa.eu>) or the UK's office (<https://ico.org.uk>) if you believe that your data protection rights relating to your personal information have been

breached by the Company or that your personal information has been compromised in some way. You may contact us with request, complaints or questions regarding these rights as set forth in the “How to contact us” section below.

Similarly, individuals in countries outside of the EU may exercise their rights under any applicable data protection laws by contacting us in accordance with the “How to contact us” section below.

#### **11. Links to third party websites and applications**

Our internet Services may contain links to a third- party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party websites and applications. Your use of such sites and applications is subject to the applicable third- party privacy statement and is at your own risk.

#### **12. Direct marketing**

We may send you unsolicited direct marketing e-communications about our solutions, products and services. You can choose whether you wish to receive marketing e-communication from the Company by email, SMS, post and phone. You may opt out of receiving marketing materials from us at any time and manage your communication preferences by:

- Following the unsubscribe instructions included in each marketing email or SMS text message from us.
- Sending an email to the sender of the marketing communications or writing to The Company via this email address; [blaze@blazeinternet.co.za](mailto:blaze@blazeinternet.co.za)

We will comply with your request as soon as is reasonably practicable.

If you opt out of receiving direct marketing related communication from us, we may still send you administrative messages as part of the ongoing use of our products, solutions and services which you will be able to opt out of.

We do not provide your personal information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal information commercially available to any third party.

#### **13. Retaining your personal information**

We will retain your personal information for as long as is necessary to fulfill the purposes for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets or enforce agreements. The criteria we use to determine include whether:

- We are under a legal, contractual or other obligation to retain the personal information or as part of an investigation or for litigation purposes
- Personal information is needed to maintain accurate business and financial records.

#### **14. Updating of this Privacy Policy**

We may update this privacy policy at any time. If we do, we will update the “last modified” section at the bottom of this privacy statement.

We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices.

#### **15. Details of the Company Information Officers:**

**Brian Katz**  
[blaze@blazeinternet.co.za](mailto:blaze@blazeinternet.co.za)

#### **16. How to contact us**

If you have any complaints, requests or questions about how your personal information is handled by the Company, you have a privacy concern or you wish to request or a complaint relating to personal information please contact us.

Contact Details: Brian Katz 0827743553

You also have the right to lodge a complaint with the Information Regulator once POPIA comes into effect.

Last modified 12 July 2021.