

## BarnOwl Privacy Policy

### Introduction

This privacy policy applies to this website and platform, and any other website and/or platform developed and hosted by BarnOwl.

This privacy policy will explain how BarnOwl uses the personal data that is collected from Customers, when they make use of BarnOwl's websites, and what information BarnOwl will collect.

This one privacy policy applies to any kind of information BarnOwl collects through this website or other means connected to this website (such as contacting the customer service team via email).

By clicking "Accept" and continuing to use the Services of BarnOwl, the Customer agrees to be bound by the terms of this Privacy Policy.

For the purposes of the Protection of Personal Information Act, 4 of 2013, both the Customer and BarnOwl are "Responsible Parties" as defined in Section 1.

A "**Responsible Party**" is defined as being: a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

An "**Operator**" is defined as being: a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party

"**Personal Information**" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- (a) 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;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) 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;
- (g) the views or opinions of another individual about the person; and
- (h) 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

If you, the Customer, or any person who is associated with the Customer upload, input or otherwise insert any personal information or data into the website and/or platform, you, the Customer, warrant that this information has been properly and lawfully obtained, and you have a lawful basis to process that information on the platform and/or website.

This policy will cover the following topics:

- What data does BarnOwl collect?
- How does BarnOwl collect customer's data?
- How will BarnOwl use customer's data?
- How do we store a customer's data?
- Marketing
- What are a Customer's data protection rights?
- What are cookies?
- How does BarnOwl use cookies?
- What types of cookies does BarnOwl use?
- How customers can manage their cookies
- Privacy policies of other websites
- Changes to BarnOwl's privacy policy
- How to contact BarnOwl.
- How to contact the appropriate authorities.

This Privacy Policy might be amended from time to time. In order for the customer to make sure they are still aware of how its personal information is being used, the customer should check this page from time to time. If BarnOwl makes changes to the Privacy Policy which will have an impact on the customer (for example, if we intend to process personal data for other purposes than communicated in the past in this Privacy Policy), BarnOwl will notify the customer of these changes before the new activities begin.

If the customer does not agree with this Privacy Statement, the customer should discontinue using BarnOwl's services. If the customer agrees with BarnOwl's Privacy Statement, the customer may continue to use BarnOwl's services.

BarnOwl is committed to protecting all personal information of users and their right to privacy. If a user or customer has any questions or concerns about this policy, or BarnOwl's practices with regard to personal information, the customer is encouraged to contact BarnOwl directly.

## What data does BarnOwl collect?

BarnOwl collects the following data:

### 1. Personal data that the Customer gives to BarnOwl.

BarnOwl collects and uses information which the customer provide to BarnOwl when using this website. When a customer registers an account, the customer is asked for personal identifying information such as their name, surname, registered name of business, registration number, telephone number, email address and physical address. BarnOwl may also require certain financial information from you such as payment details and billing information in order to process registration fees. This information will not be stored by BarnOwl.

### 2. Personal data you give us about others.

In some cases, customers may provide information about third parties. These other users' details will have to be provided when providing permissions for use in terms of our Terms of Use.

By using the Software and Services, both the Organisation and the Users agree and consent to the processing of Personal Information for the purposes as set out in this Privacy Policy, and the Terms and Conditions of use. The Organisation must, insofar as it collects and processes the Personal Information of any Data Subject for the purposes of making use of the Software and Services, ensure that it is compliant with the provisions of the POPI Act.

## How does BarnOwl collect customer data?

Personal information may be collected when the customer communicates with BarnOwl, or our partners; BarnOwl also collects personal information when a customer inserts it into the Website for the purpose of creating an account.

The Customer directly provides BarnOwl with most of the data it collects. BarnOwl collects data and processes data when a customer:

- Registers online for any of BarnOwl's products or services.
- Voluntarily completes a customer survey or provide feedback on any of BarnOwl's message boards or via email.
- Uses or views BarnOwl's website via the customer's browser's cookies.

BarnOwl may also receive a customer's data indirectly from the following sources:

- When a customer visits BarnOwl's website, BarnOwl automatically collects certain information. This includes the customer's IP address, the date and time the customer accessed the services, the hardware, software or internet browser the customer uses and information about the customer's computer's operating system, such as application versions and language settings. We also collect information about clicks and which pages have been shown to the customer.

## How will BarnOwl use customer data?

BarnOwl will use a customer's information to confirm that the customer's registration has been received; to validate the customer as a customer when using BarnOwl's services and calling BarnOwl's help desk; to prevent and detect criminal activity, fraud and misuse of or damage to BarnOwl's services or networks; to prosecute those responsible.

## How does BarnOwl store customer data?

BarnOwl makes use of secure, third-party servers to store customer data.

## Sharing customer information with Third Parties

**In certain circumstances, BarnOwl may share your personal data with third parties.**

To the extent that BarnOwl is required to share customer data with third parties, it will notify the customer of the purposes for sharing this data with such third parties, the identity of the third party and will obtain the customer's consent before sharing such information.

Third-party service providers: BarnOwl uses service providers, which are not part of the BarnOwl group, to support BarnOwl in providing its services. These service providers provide support services such as

- fraud detection and prevention services, including anti-fraud screening service.
- payment services. We use third parties to process payments, handle chargebacks or provide billing collection services.

All service providers are required to continue to adequately safeguard customer's personal data.

Competent authorities: BarnOwl will disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud or if BarnOwl is otherwise legally obliged to do so, and in accordance with the provisions of POPIA. BarnOwl may need to further disclose personal data to competent authorities to protect and defend its rights or properties, or the rights and properties of BarnOwl's business partners.

## What are a customer's data protection rights?

BarnOwl would like to make sure that a customer is fully aware of their data protection rights. Every user is entitled to the following:

**The right to access** – A user has the right to request copies of their personal data from BarnOwl. There may be a small fee charged to the customer for this service.

**The right to rectification** – A customer has the right to request that BarnOwl correct any information they believe is inaccurate. The customer also has the right to request BarnOwl to complete the information it believes is incomplete.

**The right to erasure** – the customer has the right to request that BarnOwl erase its personal data, under certain conditions.

**The right to restrict processing** – the customer has the right to request that BarnOwl restrict the processing of its personal data, under certain conditions.

**The right to object to processing** – the customer has the right to object to BarnOwl’s processing of its personal data, under certain conditions.

If any of the above requests are made, BarnOwl has one month to respond to you. If the customer would like to exercise any of these rights, please contact BarnOwl at

Email: [support@barnowl.co.za](mailto:support@barnowl.co.za)

Call us at: +27 (0)11 540 9100

Or write to us: P.O. Box 3009, Randburg, 2125, South Africa

## Cookies

Cookies are text files placed on a user’s computer to collect standard Internet log information and visitor behaviour information. When a customer visits BarnOwl’s websites, BarnOwl may collect information from the customer automatically through cookies or similar technology.

### How does BarnOwl use cookies?

The BarnOwl websites ([barnowl.co.za](http://barnowl.co.za)) use first party, persistent cookies to store cookie consent and cookies to keep a record of new and recurring site visitors for Google Analytics.

The application <https://www.barnowl.cloud/> uses first-party, secure, session cookies for user authentication. These will only be persistent if the user chooses “Remember Me”. First-party session cookies are also used to track user behaviour using Azure Application Insights.

### ActiveCampaign

In addition to the Cookies set out above, Barn Owl GRC ([www.barnowl.co.za](http://www.barnowl.co.za)) makes use of ActiveCampaign Site Tracking Cookies. ActiveCampaign is an online service which allows Barn Owl to receive information on a customer’s use of the BarnOwl GRC website, and how that customer interacts with the GRC website.

Information collected by this Cookie includes client profile details and information, email addresses, IP addresses, browsing habits and patterns and browsing preferences.

This information is collected to allow us to better cater our services to your preferences and to let you know of any services which we may develop down the line which might interest you.

### Google Analytics

This website makes use of Google Analytics.

Google Analytics uses cookies to help analyse how the website is used. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for us and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by

law, or where such third parties process the information on Google's behalf. You must actively consent to the transmission of your information to these servers by enabling the Cookie on your browser. Google will not associate your IP address with any other data held by Google.

### **How to manage cookies**

A customer or user can set their browser not to accept cookies. However, in a few cases, some of BarnOwl's website features may not function as a result.

### **Cross-border Transfer of Personal Information**

In some cases, information gathered by Active Campaign may be stored on their servers in the United States. In terms of the POPI Act, a person whose personal information is being transferred across borders, must consent to the transfer of that information.

By accepting the Terms and Conditions of Use of any BarnOwl website, and by accepting this Privacy Policy, you show your consent for BarnOwl to transfer this information. Active Campaign has entered into a data protection agreement with BarnOwl, which may be viewed [here](#).

ActiveCampaign's privacy policy may be accessed [here](#).

## **Privacy policies of other webs**

The BarnOwl website contains links to other websites. Our privacy policy applies only to our website, so if a customer clicks on a link to another website, the customer should familiarise themselves with their privacy policy.

## **Changes to our privacy policy**

BarnOwl keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 1<sup>st</sup> June 2021.

## **How to contact BarnOwl**

If a customer has any questions about BarnOwl's privacy policy, the data BarnOwl holds on a customer, or a customer would like to exercise one of your data protections rights, please do not hesitate to contact us.

Email us at: [support@barnowl.co.za](mailto:support@barnowl.co.za)

Call us: +27 (0)11 540 9100

Or write to us at: P.O. Box 3009, Randburg, 2125, South Africa

## **How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that BarnOwl has not addressed your concern in a satisfactory manner, you may contact the Information Regulator whose contact details can be found at:

<https://justice.gov.za/infoereg/>