

Lucid Care (Pty) Ltd Privacy and Data Policy

1. Our Privacy Statement

- 1.1 Lucid Care Proprietary Limited trading as LucidCX with registration number 2017/479116/07 is a company incorporated in terms of the Companies Act No. 71 of 2008 (as amended). We are a customer care service provider who specialises in knowledge management, training agents, personal training plans, process digitisation, adapting customer interfaces and creation of virtual presenters.
- 1.4 We understand the importance of protecting your privacy. This Privacy Policy sets out what we do with any personal information we collect and process about you or that you provide to us, how we use and process this information, when you use the Website or any other interaction with us.
- 1.5 In this Privacy Policy, "Personal Information" refers to any information which may be used to identify you or is held in association with information that can be used to identify you, including information such as your name and surname, date of birth, contact details (e.g. your home address, postal address, email address or phone number).
- 1.6 This Privacy Policy complies with the applicable data legislation in South Africa, subject to any amendments or updates following the Protection of Personal Information Act 4 of 2013 and Promotion of Access to Information Act 2 of 2000.
- 1.7 Please read this Privacy Policy carefully to understand our views and practices regarding your Personal Information and how we will treat it.

2. Processing of Personal Information

- 2.1 Depending on how you use our services, we process your Personal Information through the following website <https://lucidcare.co.za> (the "**Website**")
- 2.2 Additionally, your Personal Information may be processed through any interaction with us which is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our product and service offerings, the Website Demo Application and your experience on the Website and us in general.

- 2.3 We will always do our best to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy.
- 2.4 Please note that when you use a third-party website or platform to provide us with your information, that information may also be collected and processed by that third-party. The Privacy Policy of the third-party will then apply to any information the third-party may collect. If our Website contains any links to other websites, we are not accountable for their Privacy Policies and practices as we do not control those websites.

3. How We Collect Information

- 3.1 We as the Responsible Party use the information we collect to provide, maintain, and improve the Website, to develop new services, and to protect us, our services and our users. By accepting these terms, we strive to improve our users' experience.
- 3.2 We may receive Personal Information from you or obtain it from other sources where lawful and reasonable, such as reputable third parties that you deal with or that LucidCX interacts with for the purpose of conducting its business .
- 3.3 We collect Information directly from you when you:
 - 3.3.1 access, or use the Website;
 - 3.3.2 submit a query via the Website;
 - 3.3.3 use our “Request a Demo” function;
 - 3.3.4 exchange or send us correspondence;
 - 3.3.6 submit Personal Information to us for any other reason, or authorize third parties to do so;
 - 3.3.7 correspondence may be recorded and monitored for security purposes and to assist with staff training, under our quality control procedures;
 - 3.3.8 access the Website as we collect information through analytical tools.

3.4 We collect information from third parties when:

- 3.4.1 you have authorised third parties to share your information, or where your information is publicly available.
- 3.4.2 we are unable to obtain the information directly from you, or where our operational practices require it, we may obtain information from verifiable, independent third-party data and verification sources that have the appropriate authority to provide such information. Where appropriate, and where we have a lawful basis to do so, we may also collect information from certain organisations and other third parties.

3.5 Information collected by us depends on how you use our services and Website.

4. What types of Personal Information do we collect

4.1 Personal information that may be collected includes, but is not limited to:

- 4.1.1 **Contact Details:** Your name and surname, email address and other relevant information where necessary. If you provide us with the personal information of a third-party (such as a spouse or family member), you confirm that you have obtained their consent to share their personal information
- 4.1.2 **Enquiry Information:** information that you provide when submitting enquiries or completing forms to request information about our services.
- 4.1.3 **Contractual Information:** details relation to purchases or other commercial transactions connected to agreements you conclude with us, our service providers and/ or strategic partners.
- 4.1.4 **Profile Information:** information relating to your purchasing history preferences, performance under contracts, financial behaviour, objectives and requirements, services you have expressed interest in, and any reviews or feedback you provide regarding our offerings.
- 4.1.5 **Preferences and Consents:** record of your selections, permissions and consents provided to us.

- 4.1.6 **Device and technical usage information:** your IP address, unique device identifier, the nature of the devices which you use (e.g. a computer, a tablet or smart phone), the geographic location from which you access the Website (i.e. the geographic location of your Access Device), hardware model and settings, operating system type and version, browser language, system activity, crashes;
 - 4.1.7 **Server logs:** (i.e. our web servers automatically record and maintain a log of their activities when users), which may include your "site activity information", such as details of how, when and for how long you accessed and used the Website and other site traffic and use information URLs, which pages you accessed, the number of pages viewed and the order of those pages, the amount of time spent on those pages, the number of clicks, and exit pages;
 - 4.1.8 **Third Party Information:** information obtained from external sources such as credit bureaus, fraud-prevention agencies and other data providers. This includes demographic data and data relating to your interests or behavioural patterns.
 - 4.1.9 **General Information:** Any additional Personal Information that we may reasonably require to offer services to you. This may also include insights derived from the information described above that relate to your preferences or other relevant matters, as well as internal reports or analytical data created from the personal information we collect.
- 4.2 If you are a third-party service provider, we may collect personal information as necessary to manage and maintain the business relationship and fulfil obligations arising from any agreement between us. If you provide us with Personal Information relating to other individuals(such as shareholders, employees, or directors), you confirm that you are authorised to share such information with us for the purposes described in this Privacy Notice.
- 4.3 By using this Website, you consent to the transfer of personal information.

5. Cookies

For more information, have a look at our [Cookie Policy](#).

6. How We Use Your Information

6.1 Your information is collected for the following reasons:

- 6.1.1 to retain and make information available to you on the Website;
- 6.1.2 maintain and update our customer, or potential customer, databases;
- 6.1.3 diagnose and deal with technical issues and customer support queries and other user queries;
- 6.1.4 operate, administer, maintain, secure, and develop the Website and the performance and functionality of the Website;
- 6.1.5 detect, prevent, or deal with actual or alleged fraud, security or the abuse, misuse, or unauthorised use of the Website and/or contravention of this Privacy Policy;
- 6.1.6 to conduct market research surveys, research and development;
- 6.1.7 communicate with you and keep a record of our communications with you and your communications with us;
- 6.1.8 inform you about any changes to this Privacy Policy or other changes which are relevant to you;
- 6.1.9 to create user profiles and to analyse and compare how you and other users make use of the Website, including (without limitation) habits, click-patterns, preferences, frequency and times of use, trends and demographics;
- 6.1.10 to enhance and develop our Website, services and/or distribution methods;
- 6.1.11 to meet applicable legal, regulatory, risk management and compliance obligations, including adherence to directives, sanction, rules, industry agreements and both voluntary and involuntary codes of conduct, as well as to respond to reporting obligations or official information requests;
- 6.1.12 to maintain security, verify your identity and ensure the accuracy of your Personal Information;

- 6.1.13 to administer and manage your employment relationship or any potential employment relationship;
- 6.1.14 to test and evaluate updates or changes to our IT systems and applications and for training purposes;
- 6.1.15 to administer and maintain our supplier relationships;
- 6.1.16 to compile data records about you for third parties where you have provided consent for such data to be accessed, used or shared with them;
- 6.1.17 to analyse and compare the kinds of access devices that you and other users make use of and where you are using them;
- 6.1.18 for other purposes relevant to our business activities, provided they are lawful; and
- 6.1.19 for marketing research (including participating in surveys), product analysis and development, sales tracking, or to contact you for marketing or promotional purposes. We may contact you through various electronic means including by telephone, email, SMS, or multimedia messaging service or other electronic means, or we may do so by post or in person.

7. Sharing Information

- 7.1 We may share your personal information with other entities within our group, with companies providing a service to us or our group including agents and subcontractors, or with our dealers. However, such entities and persons will only use your personal information for the purposes set out above. Please note that, other than the third-parties, we will not disclose your personal information to any other third-party whatsoever without your consent and we will never sell your personal information.
- 7.2 We will not intentionally disclose, for commercial gain or otherwise, your Personal Information other than as set out in this Privacy Policy or with your permission.
- 7.3 Once information has been shared with another company, that company is now the Responsible Party of that information and as such information falls under their Privacy Policy and practices.

7.4 Your information may be shared under the following circumstances:

- 7.4.1 to our agents, advisers, service providers and suppliers who are bound by a Privacy Policy/Agreement and/or privacy/data legislation;
- 7.4.2 to our employees, suppliers, service providers and agents if and to the extent that they need to know that information in order to process it for us and/or to provide services for or to us, such as hosting, development and administration, technical support and other support services relating to the Website. For protection, we will authorise any information processing done by a third-party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;
- 7.4.3 in order to enforce or apply any contract between you and us;
- 7.4.4 in order to protect our rights, property or safety or that of our customers, employees, contractors, suppliers, service providers, agents and any other third-party;
- 7.4.5 to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third-party;
- 7.4.6 to governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
 - a) comply with the law or with any legal process;
 - b) protect and defend the rights, property or safety of us, or our customers, employees, contractors, suppliers, service providers, agents or any third-party;
 - c) detect, prevent, or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of the Website and/or contravention of this Privacy Policy;
 - d) protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else,

we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

8. Security

- 8.1 We take reasonable technical and organisational measures to secure the integrity of retained information, using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information, and protect your Personal Information from misuse, loss, alteration or destruction.
- 8.2 From time to time, we review our information collection, storage and processing practices, including physical security measures, to keep up to date with good practice within our sector.
- 8.3 Even by taking the above measures when processing Personal Information, we cannot guarantee that our security considerations are 100%(one hundred percent) successful.
- 8.4 In the event of a data breach which in any way compromises or might compromise your personal information, we will notify you in accordance with our data breach policy. If you have any reason to believe that your interaction with us is no longer secure, please immediately notify us using the Contact Details below.

9. Data Retention

- 9.1 We may keep and Process some or all of your Personal Information if and for as long as:
 - 9.1.1 we are required or permitted by law or a contract with you to keep it;
 - 9.1.2 we reasonably need it for lawful purposes related to our functions and activities;
 - 9.1.3 we reasonably need it for evidentiary purposes; or
 - 9.1.4 you agree to us keeping it for a specified further period.

10. Minors

The Website is not targeted at people under the age of 18. We will not knowingly collect information from persons in this age group without the required consent to do so.

11. Direct Marketing

- 11.1 When you provide us with your personal information, you may agree to receive marketing communications from us.
- 11.2 You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing.
- 11.3 You may opt out of receiving direct marketing communications from us at any time by requesting us (in the manner set out in the communication or by contacting us at the contact details set out below) to desist from initiating any direct marketing to you.
- 11.4 If you have opted out, we may send you confirmation of receipt of your opt-out request, and not send you any further direct marketing communications.

12. Changes to our Privacy Policy

- 12.1 We may, at any time, change this Privacy Policy and will take reasonably practical steps to inform you of the changes. Without limiting the ways we may inform you, we may inform you either by sending you an email or by placing a notification on the Website.
- 12.2 You are encouraged to check the Website regularly for updates to this Policy.
- 12.3 If you do not agree to the changes to this Privacy Policy, you must end your use of the Website.

13 Your Rights

- 13.1 We take reasonable steps to ensure that your Information is accurate, complete, not misleading, and up to date.
- 13.2 It is important to us that you are aware of your rights when it comes to your Personal Information. You have the following options:

- 13.2.1 **Access:** You may request access to your Personal Information;
 - 13.2.2 **Objection to processing:** You may withdraw your consent (opt-out) to our use of your Personal Information unless legislation provides such processing;
 - 13.2.3 **Correction:** You may request to correct or change your Personal Information so that it is accurate and up-to-date;
 - 13.2.4 **Deletion:** You may request that we delete your Personal Information; or
 - 13.2.5 **Lodge a complaint:** if you are not happy with how we handle the process, you may lodge a complaint with the Information Regulator.
- 13.2 If you're unhappy with our treatment of your Personal Information, please contact us so we can investigate.

Location: 19 A, 1st Avenue East,
Parktown North,
Gauteng,
2193.

Postal Address: 19 A, 1st Avenue East,
Parktown North,
Gauteng,
2193.

- 14.4 You can also contact our Information Officer at **082 410 3660** or via email at jim.beattie@lucidcx.com.

14 Governing law

- 15.1 To the extent that there is a conflict or contradiction to what is stated in this Privacy Policy and the applicable legislation mentioned below, the applicable legislation will prevail to the extent of such conflict.
- 15.2 The governing laws regarding privacy and data legislation for the Republic of South Africa are the Protection of Personal Information Act 4 of 2013 and Promotion of Access to Information Act 2 of 2000 (as amended from time to time).

15 Contact Us

If you have questions about our how we collect and process information, our Privacy Policy, wish to contact us, or any information we have about you is incorrect, incomplete, misleading or out of date, please notify us using contact details set out below.

Please contact us at: **082 410 366** or via email at jim.beattie@lucidcx.com .