

# IMD Privacy Policy

## Who we are

We are Interact Media Defined (“IMD”), the data controller, a company registered in South Africa with company registration number 2014/092774/07 and whose registered address is 13A Riley Road, Bedfordview, Johannesburg, 2007, South Africa.

IMD respects your right to privacy and will process personal information you provide only in accordance with the Protection of Personal Information Act, 2013 (“POPI”) and any other applicable privacy laws.

## What information do we collect?

When you visit this website (“the Website”), or any other IMD Website, our web server collects some basic information such as your browser type, IP address, Internet service provider’s domain name, which pages you accessed on the site, and when. Details of cookies used on the Website can be found on the Cookie Policy.

If you register for an alert service, then we will also collect your name and email address.

## What do we use your data for?

### Improving IMD

Testing features, managing landing pages, heat mapping our site, traffic optimisation, and data analysis and research, including profiling and the use of machine learning and other techniques over your data and in some cases using third parties to do this.

Legal basis for processing: Legitimate interest

### Managing communications with you

As part of the alert service, we will send you regular communications by email. If at any time you would like these to stop, you can unsubscribe either through the opt-out link in the email or by contacting us at [privacy@nteractmedia.co.za](mailto:privacy@nteractmedia.co.za)

Legal basis for processing: Consent

## What legal basis do we have for processing?

Under POPI, we need to demonstrate that we are processing your data in line with at least one of six different legal bases. The legal bases we use for processing your data are.

- **Legitimate interest:** We process some of your data because it is in our legitimate interest to do so. Where this is the case, we have considered how using your information may affect you and limited our use to only what is strictly necessary. In

the case of improving our web services, it is in our legitimate interest as an organisation to ensure that we provide you with the best possible service. This necessitates the use of some browsing data to identify trends and where improvements can be made. We believe it is within the reasonable expectations of the visitors to our Website that we would use their information in this way. Where we are using this as our basis, you are free to contest the decision if you wish.

- **Consent:** Certain data processing will be performed where we have sought your prior consent. If we require your consent, we will provide you with full details of the information that we would like and the reason we need it. Once given, you have the right to withdraw your consent again at any point and we will be obliged to stop processing your data and delete it unless we can demonstrate that another legal basis applies.
- **Public domain:** Other data will be processed only where such data is derived from a public record or where you have deliberately made the data available to the public.

## Data transfers outside of South Africa

If you register for the alert service, you will need to provide your name and email address. This information will be held by our third-party communications for administration of the alert service. Your data is protected by contracts between us and this organisation, which mandate a POPI-compliant level of security when they access your information outside of South Africa. The information will not be used for any other purpose; it will be stored securely and will not be shared with third parties.

IMD may transfer personal information that is collected from you in connection with any of the other above purposes to third-party data processors located in countries that are outside of South Africa. Please be aware that countries that are outside South Africa may not offer the same level of data protection; although the collection, storage, and use of your personal data will be covered by agreements that demand a POPI-compliant level of protection by the third party when it is processing your data. You will also be informed if we intend to send your data outside South Africa.

## Third-party use of information

Except as described above, IMD will not disclose, sell, or rent your personal information to any third party unless you have consented to this. If you do consent but later change your mind, you may contact IMD to ask for any such activity to stop.

However, if a third party acquires all (or substantially all) of IMD's business and/or assets, IMD may disclose your personal information to that third party in connection with the acquisition. IMD may also disclose your personal information to a governmental body or law enforcement agency where required to do so by applicable law.

Finally, IMD may also collect anonymised details about visitors to the Website for the purposes of aggregate statistics or reporting. However, no single individual will be identifiable from the anonymised details collected for these purposes.

## Security

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect. For more information on our efforts to ensure your data is held in a secure manner, please feel free to contact us. And please remember:

- You provide personal data at your own risk. Unfortunately, no data transmission is guaranteed to be 100% secure.
- If you believe your privacy has been breached, please contact us immediately at [privacy@interactmedia.co.za](mailto:privacy@interactmedia.co.za)

## How long do we store your data?

The amount of time we hold your data varies according to the purpose we have for using it. However, we will not hold data for any longer than is necessary for the purposes for which we have collected it. Details on specific retention periods for our data can be obtained by contacting us.

We hold identifiable data on web browsing for no longer than 30 days.

## Your rights

- You can exercise your rights by sending us an email at [privacy@interactmedia.co.za](mailto:privacy@interactmedia.co.za).

You have the right to access information we hold about you. This includes the right to ask us supplementary information about:

- the categories of data we are processing
- the purposes of data processing
- the categories of third parties to whom the data may be disclosed
- how long the data will be stored (or the criteria used to determine that period)
- your other rights regarding our use of your data.

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedom of others (e.g. another person's confidentiality or intellectual property rights). We will tell you if we cannot meet your request for that reason.

You have the right to compel us to correct any inaccurate personal data about you.

You can object to us using your data for profiling you or making automated decisions about you.

- We may use your data to determine whether we should convey information that might be relevant to you (for example, tailoring emails to you based on your behaviour). Otherwise, the only circumstances in which we will do this is to provide an IMD service to you.

You have the right to be 'forgotten' by us.

- You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for the purpose that we have collected it.

You have the right to lodge a complaint regarding our use of your data.

- Please tell us first, so we have an opportunity to address your concerns. If we fail in this, you can address any complaint to [privacy@interactmedia.co.za](mailto:privacy@interactmedia.co.za)

## **Third-party sites**

The Website may contain links to other websites operated by third parties. Please note that this privacy policy applies only to the personal information that IMD collects through our Website and IMD is not responsible for personal information that third parties may collect, store, and use through their websites. You should always carefully read the privacy policy of each website you visit.

## **Contact us**

If you have any queries regarding how we protect your data, then you may contact us at [privacy@interactmedia.co.za](mailto:privacy@interactmedia.co.za)

Please do not make this the last time that you read our privacy policy, as we will post any changes on this page. Significant changes will of course be notified to you by email.

Last updated 11 June 2018