



Document Name	DUX_Privacy Policy	Date of Issue	June 2022	Date of Review	June 2024
Version no	1			Last Revision	June 2023

Introduction

We at Dux Powered by People dynamics respect our constitution and your right to privacy.

Where we refer to “personal information”, it means “personal information” as defined in the Protection of Personal Information Act, 4 of 2013 (“POPI”), and “personal data” as per the General Data Protection Regulation 2016/679 (“the GDPR”).

Personal information includes any information about a person that can be used to identify a person directly or indirectly. It includes information like:

- a name,
- an identification number,
- location information,
- an online identifier or
- one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

POPIA includes the personal information of juristic persons in its ambit – so we will protect the personal information of juristic persons in the same manner as any other person’s personal information.

Where applicable, this privacy policy applies in addition to any other agreement that you enter into with us.

The personal information we collect

We collect, amongst others, the following personal information:

- personal details, such as your name, email address or telephone number;
- billing information, such as relevant payment information and VAT registration number; and
- legally required information, which includes any additional information that the law requires from us to verify your identity.

How we collect personal information

- Directly from you when you use our website or any of our services or if we request it from you.
- In limited instances, we collect personal information from third parties. We will only collect personal information this way where such information is publicly available or for legitimate business purposes.
- Through the use of cookies, which will mainly be used to identify visitors that return to our website. You can prevent us from doing this through a setting on your browser. Cookies only store information from your browser and cannot access data on your computer.



Use of your personal information

We may use your personal information for any legitimate business purposes relating to our services and/or business activities. Some of the purposes for which we use your personal information include:

- responding to your queries posted on our website or emailed to us;
- evaluating your eligibility as a potential beneficiary of the bursary fund;
- onboarding you as an applicant or later beneficiary and verifying your identity (as required by law);
- providing you with our services;
- referring you to other service providers with your consent;
- improving our website and services by analysing certain information collected, including cookies and other related information;
- sending you information (in the form of our newsletter) and inviting you to events;
- and/or comply with our regulatory or other obligations;
- for internal research purposes regarding applicants of the bursary.

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

Marketing

When you become a client or beneficiary, you will be added to our mailing list. We use this mailing list to send you important information about our business, the services we offer, legal developments, news and event invitations. You can also add yourself to our mailing list on our website.

You can unsubscribe from our mailing list at any time which will result in us no longer marketing to you. We include a link in every marketing communication allowing you to unsubscribe from marketing communication and you can email us to ask us to remove you from our mailing list.

If you unsubscribe from our mailing list, we may still contact you in other instances, such as in the course of providing you with services or to collect outstanding fees or documents due to us. In these instances, the relevant practitioner will contact you directly and not through the mailing list.



Sharing your personal information

We will only share your personal information for purposes of providing services to you or any other legitimate business purpose relating to our business activities, including but not limited to, the protection of our or your rights, complaints, marketing, or enforcing any agreement between us.

Where required for our business operations, we may share your personal information with our service providers. We only share information with service providers after we enter into an agreement with the service provider to regulate the way in which the personal information will be secured.

Where the law requires us to do so, we may also share your personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates. We will only share your personal information in these instances where it is necessary for us to do so and only to the extent that your personal information is needed for such third parties to perform their services or obligations.

Use of personal information trans-border

We may transfer your information cross border for our legitimate business purposes, such as for cloud storage and for our billing practices. All information transfers will comply with the applicable laws.

Security

We will take all reasonable steps to ensure that your personal information is protected. We protect and manage personal information that we hold about you by using electronic and computer safeguards like firewalls, data encryption, and physical and electronic access control to our buildings. We only authorise access to personal information to those employees who require it to fulfill their designated responsibilities.

Links on our website(s)

We may include links to other third-party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these websites, but we display these links to make it easier for you to find information about specific subjects.

Right to object

You may, on reasonable grounds, object to us using your personal information. If you object, we will stop using your personal information, except if the law allows its use.

Lodging a complaint

If you believe we are using your personal information unlawfully, please let us know first (on info@duxpd.co.za or 060 656 1305).

- You may lodge a complaint to the Information Regulator (South Africa) with the following contact details:
 - Website: <https://www.justice.gov.za/infoereg/index.html>.
 - Address: SALU Building, 316 Thabo Sehume Street, Pretoria.
 - Contact number: 012 406 4818.
 - Fax number: 086 500 3351.
 - Email: infoereg@justice.gov.za.



Children’s personal information and special personal information

We do not intentionally collect or use personal information of children (persons under the age of 18 years), unless with the express consent of a parent or guardian or if the law otherwise allows or requires us to process such personal information.

Quality and access to your personal information

We want to ensure that your personal information is accurate and up to date. You may ask us to correct any personal information that you think is inaccurate or request us to remove your information by sending an email to info@duxpd.co.za.

You have the right to request us to provide you with the personal information that we hold about you. You must contact us directly to do so or send an email to info@duxpd.co.za.

Retention of Information

We retain personal information in accordance with the required retention periods in law or for legitimate business purposes. We may keep personal information indefinitely in a de-identified format for statistical purposes. This privacy policy also applies when we retain your personal information.

Security breach

We will report any security breach to the Information Regulator and to the individuals or companies involved. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your personal information, kindly notify us by sending an email to info@duxpd.co.za

For any comments or queries relating to this policy, please contact our information officer, Jordan Thompson on account@peopledynamics.co.za or info@duxpd.co.za