

# Website Privacy and Cookie Policy

14 April 2025

[www.afferentsoftware.com](http://www.afferentsoftware.com)

This is the Privacy Policy of Afferent Software (Pty) Ltd | Registration number 2016/076835/07

# 1. Introduction

Welcome to our website, and thank you for reading our Policy. This Policy applies to all the web pages related to our Website and should be read together with our general Terms and Conditions.

At Afferent Software, we treat your Personal Information responsibly and we value our users and recognise their right to keep Personal Information private.

Our Privacy Policy complies with the Protection of Personal Information Act, 2013 (POPIA). Please read this Policy as by using our Website, you consent to the data practices as described within this Policy.

The aim of our Policy is to describe the types of Personal Information that we collect, our use of such information, the guidelines that Afferent Software maintains in protecting your privacy and to inform you of your rights.

# 2. Personal Information that we collect and receive

We limit the Personal Information we process to only that to which you consent and which is necessary for our legitimate business interests.

## **Information that you provide directly to us:**

This includes any information that you provide to us directly when you engage with Afferent Software. For example, posting comments or content on our social media pages; or entering a promotion or completing a survey or questionnaire.

We may ask you to provide us with Personal Information about yourself, for example, your first and last name, email address, phone number, employer name and job function/title or department in order to submit an enquiry to us through an Applications page, Contact page, and/or to sign up to receive our newsletters or other communications.

## **Information that we collect automatically:**

Afferent Software collects information on our website visitors collectively including which sections of the website are most frequently visited, how often and for how long. This data is always used as aggregated, non-personal information. Afferent Software utilises this information to improve and enhance our services by monitoring the areas on the website which are most popular to you.

- **Internet Protocol (IP) Addresses**

Afferent Software's web servers gather your IP address to assist with the diagnosis of problems or support issues with our services. IP address information is anonymised before being gathered and therefore cannot be used to trace to an individual user.

- **Cookies**

The Afferent Software website uses cookies to improve your experience while you navigate through the website. Out of these cookies, the cookies that are categorised as necessary are stored on your browser as they are essential for the working of basic functionalities.

**Necessary (Always Enabled)**

Necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensure basic functionalities and security features of the website. These cookies do not store any personal information.

**Non-necessary (with an option to opt out)**

Any cookies that may not be particularly necessary for the website to function and are used specifically to collect user personal data via analytics, ads, other embedded contents are termed as non-necessary cookies. As a website user, consent must be provided to run these cookies.

### 3. Purpose for which Personal Information is collected

Afferent Software will process your Personal Information only for the purposes for which it was collected and agreed with you. For example, but not limited to:

- Communicating with you
- To gather your contact information and respond to your enquiries or complaints
- To comply with legislative, regulatory, risk and compliance requirements
- To provide you with information regarding our products and services that you request from us
- Supplying you with information by electronic communication if you have agreed thereto

### 4. Sharing of Personal Information

We safeguard your Personal Information by ensuring that the Afferent Software site adheres to our data protection principles as described in this statement.

We may share your Personal Information with a limited number of our employees and/or 3rd party service providers in order to communicate with you and provide assistance in terms of any product or service enquiries or complaints which you have raised.

We may collect and possibly share Personal Information and any other additional information available to us in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Afferent Software's terms of use, or as otherwise required by law.

## 5. Storage and Security of Personal Information

Afferent Software is committed to protecting your Personal Information and takes all reasonable steps to ensure the security of our system. We implement technical and organisational measures to ensure a level of security that is appropriate to the risk to the Personal Information that we process. These measures are aimed at ensuring the integrity, confidentiality, and availability of Personal Information.

Afferent Software allows you to access your information at any time to keep it accurate and up to date. Any information which we hold for you is stored on secure servers that are protected in controlled facilities. We will, on an on-going basis, continue to review our internal security controls and related processes to ensure that your Personal Information remains secure.

Afferent Software will not be responsible for events arising from unauthorised access of your Personal Information by any 3rd party. It is important for you to diligently endeavor to keep your Personal Information secure by maintaining the confidentiality of any passwords and accounts used on the Afferent Software website.

We bind our employees to observe your privacy and confidentiality rights.

## 6. Access to and retention of Personal Information

If you have supplied us any personally identifiable information, you can view, amend, or delete it, by contacting our Information Officer as per Section 8.

Afferent Software will not retain your Personal Information longer than is necessary to achieve the purpose for which the information was initially collected, or subsequently processed, unless we are required to do so by law.

## 7. 3rd Party Website Links and Transborder Flows of Personal Information

Your Personal Information may be stored and processed in your region or another country where Afferent Software, our affiliates and service providers maintain servers and facilities, for example, but not limited to South Africa, the United Kingdom, and the United States. We take steps, including Standard Contractual Clauses (SCCs) and Data Protection Agreements, intended to ensure that the information continues to be protected wherever it is located and, in a manner consistent with the standards of protection required under the applicable laws.

Afferent Software may provide links on its website and pass through to 3rd party sites. It follows that you may access these 3rd party sites via the Afferent Software website. It should be noted that the use of your information by these 3rd party sites is not within the control of Afferent Software. Afferent Software is not responsible for the conduct of these 3rd parties.

- Social Plugins
  - We use social plugins of social networking sites such as Facebook, LinkedIn, and Instagram. Please note that we have no influence over or control over the extent of the data retrieved by the social networking interfaces and we can not be held responsible or liable for any processing or use of Personal Information transmitted via these social plugins. For information on the purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for the protection of your Personal Information, please refer directly to the social network in questions.

## 8. Data Breach Response

Afferent Software takes all reasonable steps to prevent data breaches. However, in the event of a breach:

- Affected individuals will be notified without undue delay if there is a risk of harm
- The Information Regulator will be informed where legally required
- We will take immediate measures to contain and investigate the breach, ensuring corrective action is taken

If you suspect a security incident involving your data, please contact us at [hello@afferentsoftware.com](mailto:hello@afferentsoftware.com)

## 9. Information Officer

An Information Officer has been appointed to act on behalf of Afferent Software. All queries and complaints may be directed to him or her at [hello@afferentsoftware.com](mailto:hello@afferentsoftware.com)

## 10. Information Regulator

In the event that you feel that a complaint has not been dealt with satisfactorily, you may lodge a complaint with the Information Regulator via email at [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)

## 11. Privacy and Site Changes

We reserve the right, and may in our sole discretion choose to amend our Privacy Policy at any time and in any manner that we deem appropriate. This includes the right to change, modify, add or remove portions or the whole of our Privacy Policy from time to time.

This version was updated in April 2025 and in line with POPIA requirements. The latest version will always be available on our website for you to view.