



adaptive

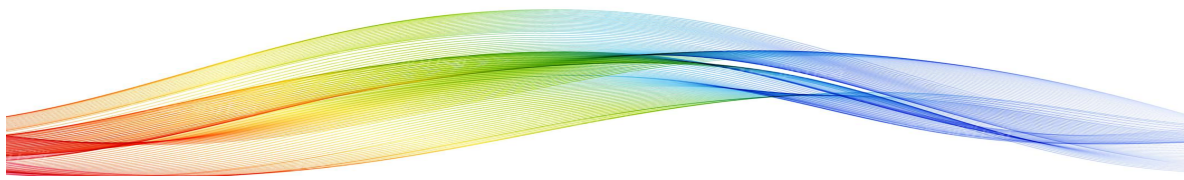
... OF COURSE WE CAN!

Privacy Policy

SOUTH AFRICA
Adaptive Consulting (Pty) Ltd
84 Kinfauns Street
Sydenham
Gauteng
2192
Company Reg: 2105/171734/07

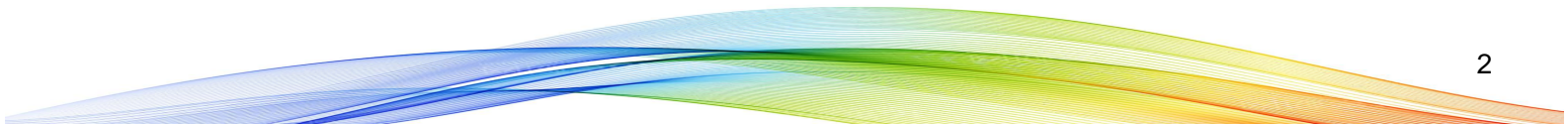


Directors: Ross Haydock, Gerald Louw
www.adaptive.za.com | info@adaptive.za.com



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Introduction

The purpose of The Adaptive Consulting (Adaptive) privacy policy is to set out the basis on which Adaptive (“Us”, “We”, “Our”) process Personal Information. When visiting Adaptive’s website (<https://www.adaptive.za.com/>), Adaptive’s social network sites or pages (“our site”) or by utilising our services you are accepting and consenting to the practice described in this policy.

For purposes of the Protection of Personal Information Act 4 of 2013 (the Act), the responsible party referred to in the privacy policy is Adaptive. Our nominated Information Officer for the purpose of the Act is: Ross Haydock.

Adaptive Consulting (Pty) Ltd (a private company registered in South Africa with the company number 2015/171734/07). Our main office address is 84 Kinfauns Street, Sydenham, Gauteng, South Africa, 2192. Tel: +27 11 485 2997. (“service provider”)

We are responsible for the operation of the following sites:

- <https://www.adaptive.za.com/>
- <https://www.adaptive.za.com/odyssey/>
- <https://www.adaptive.za.com/support/>

Information we may collect from you

We may collect and process the following data about you:

- **Information that you or the client provides.** This may be by filling in forms on our site, providing us with your business card or contact details, providing us with your information in registering for our services or to use our client support tools, and/or by corresponding with us by phone, email or otherwise. This includes information provided at the time of registering to use our site or provided by the *client* to register for the services on the site. We may also ask you for information if you report a problem with our site. The information that you provide to us may include name, email address, company and position, address and telephone number and other such information as may be communicated to, or provided by you, as well as the details contained in your query.
- **Learning data.** All interactions with learning data (such as e-learning courses) are recorded and stored, which includes access to learning materials, interactions therewith and scoring of assessments.
- **Browsing and Cookies:** No personal information – such as your name, address, contact phone numbers or email address – will be collected if you are only browsing our site, but we use cookies on our site as specified in the Cookies section below.
- **Comments:** When visitors leave comments on the site, we collect the data shown in the comments form, and also the visitor’s IP address and browser user agent string to help spam detection.
- **Media:** If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.
- **Forms:** All data collected by forms on the website will be collected and stored for administrative purposes only and will not be shared with third parties without prior consent of the client.
- **Embedded content from other websites:** Content on this site may include embedded content (e.g. videos, images, articles, e-learning content etc.) Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

This information may be provided:

In the course of communications between you and us (including by phone, email, chat, Website, social media or otherwise);

- when you register for an account;
- when an account is registered on your behalf by the client;
- when you order or inquire about Services;
- when you sign up for our newsletter or other materials;
- when you report a problem with our Website or Services;
- when you interact with any content and learning materials on the website.

Cookies

- The Website uses cookies to distinguish you from other users of the Website. Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognize your device and to collect information such as internet browser type, time spent using Services, and pages visited. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.
- We may use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience while using the Services. In addition, we may use the information to gather statistical information about the usage of the Services in order to understand how they are used, continually improve their design and functionality, and assist us with resolving questions about them.
- You can refuse to accept the cookies we use by adjusting your browser settings. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Website and some online Services.

Who do we share your data with?

We use your personal information in connection with the provision of the Website and the Services to you. In particular, your personal information may be used by us, our employees and the *client*.

None of your private data is made available to or sold to any third parties.

Social media platforms

- Communication, engagement and actions taken through external social media platforms that we, our directors or employees participate in, are subject to the specific terms and conditions and privacy policies of those social media platform.
- Our site may link to social media platforms or use such platforms as methods to login. It is important note that these platforms have their own terms of use and privacy policy which will apply to your use of the respective platforms. You must not breach these platforms policies when using them either through our site or in order to login is as directed by our site.
- We will never ask for personal or sensitive information through social media platforms. We encourage users, wishing to discuss sensitive details or to resolve issues/concerns, to contact us through primary communication channels (see our contact us page).
- Our social networks page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to take caution and good judgement before clicking any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting shortened links.

Interception and monitoring of information

In order for us to deliver suitable security and check for viruses, we reserve the right to intercept, monitor, copy or block communications to and from our communication facilities (in accordance with the relevant provisions of law).

Your rights

- **Marketing:** You have the right to ask us not to process the information for marketing purposes. Usually (before collecting your data) you will be informed if we intend to use your data Personal Information for such purposes or if we intend to disclose your Personal Information to any third party for the purpose of marketing. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise this right, at any time, by contacting us at Adaptive or use the unsubscribe functionality on our email communications.
- **Third party websites/social media sites:** Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please read these policies before submitting any personal information to these websites.
- **Access to information:** You have a right to see/access the information that we keep about you. You may instruct us to provide you with any personal information we hold about you upon receipt of a written request and payment of a fee as per the Promotion of Access to Information Act 2 of 2000 ("PAI Act") (click [here](#) to view the PAI Act). It is important to take note that not all information requested may be disclosed. Disclosure of information shall take place in accordance with the PAI Act.
- **Protection of personal information:** We may not process any personal information concerning you unless we have your prior consent to do so. It is important to take note that not all information may be prohibited from being processed or distributed. The processing of information shall take place in accordance with the Protection of Personal Information Act 4 of 2013 ("POPI" Act) (click [here](#) to view the POPI Act).

For access to your personal data, please log onto the system to view all records kept about you. Alternatively, please contact support@adaptive.za.com to request your personal information.

Quality of personal information

- It is your responsibility to check the accuracy of the information prior to submitting it to us. On receipt of the information, we assume that you have checked it and that the information is accurate;
- Please contact us if the information that we hold about you needs to be corrected or updated. Take note that a request to update the information may take up to 48 (forty-eight) hours to execute.

Retention of Personal Information

Your personal information will be retained for as long as required:

1. for the purposes for which the personal information was collected;
2. in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
3. as required by data protection laws and any other applicable laws or regulatory requirements.

Changes to our privacy policy

This policy may be updated by us from time to time, so please check this policy periodically to ensure you are aware of our latest policies.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to legal@adaptive.za.com. Complaints should be sent to the same address.