# Privacy Policy for MLB Dienste CC (2023) Version 1

At **MLB Dienste CC** ("We"), we are dedicated to safeguarding and respecting your privacy. This Privacy Policy outlines how we collect and process personal information provided by you or obtained through our services.

Please take the time to carefully read and understand this policy to be aware of our practices concerning your personal information and how we handle it.

By using the **MLB Dienste CC** website ("our site") or availing of our services, you acknowledge and consent to the practices described in this policy.

For the purposes of the Protection of Personal Information Act 4 of 2013 ("POPI"), **MLB Dienste CC** is the responsible party. Under the General Data Protection Regulation,
2016/679 ("GDPR"), **MLB Dienste C**C serves as the data controller. Both POPI and GDPR are collectively referred to as the "Acts" in this policy.

Our designated Information Officer for matters related to the Acts is the appointed MLB Dienste CC Head of Platforms.

#### 1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data:

- **1.1. Information you provide:** When you fill in forms on our site or interact with us through phone, email, or other means, you may share information about yourself. This includes data you submit during site registration, service subscriptions, participation in social media functions, surveys, login activities, and when reporting issues. Such information may include your name, address, email address, phone number, financial and credit card details, personal description, and photograph.
- **1.2. Automatically collected information**: During your visits to our site, we may automatically collect the following information:
- **1.2.1. Technical information:** This includes your Internet Protocol (IP) address used to connect to the Internet, login details, browser type and version, time zone settings, browser plug-in types and versions, operating system, and platform.
- **1.2.2. Information about your visit:** Such as the full Uniform Resource Locators (URL), clickstream data, browsing history, viewed or searched services/products, page response times, page errors, length of page visits, page interaction information (e.g., scrolling, clicks, mouse-overs), and phone numbers used to call our customer service.
- **1.3. Information from other sources:** We may receive information about you from other websites or authorized third parties, with whom we have already informed you about data sharing. We may also collaborate with third parties (e.g., business partners, sub-contractors,

advertising networks, analytics providers, search information providers, credit reference agencies) who may share information about you with us.

By "consent," "your consent," or "your explicit consent," we include actions such as clicking "application," "submit," "I agree," or "I acknowledge" buttons on our site, or using our Services.

#### 2. COOKIES

- 2.1. Cookies usage: We may use cookies to enhance our understanding of site users. Cookies help us determine which pages and advertisements you have viewed, the frequency of page visits, and popular areas of our website. Depending on the cookie type, they also improve user-friendliness, for instance, by saving your password to avoid repetitive entry.
- 2.2. Cookie management: You can adjust your browser settings to decline cookies. However, this may limit access to certain features like login with a username and password.
- 2.3. Browser notification: You can set your browser to notify you when a website attempts to place a cookie on your device.
- 2.4. No personal information: Cookies do not contain personal data like your home address, phone number, or credit card details. We do not exchange cookies with third-party websites or external data suppliers.
- 2.5. IP address: Your browser generates other information, including language preferences and your IP address, which is logged by our servers for traffic data purposes. We do not use your IP address for personal identification.
- 2.6. Third-party cookies: Some business partners use their own cookies on our website, but we do not have control over them. The privacy policy of the creating company governs information collected by those cookies, not us.

### 3. USES MADE OF THE INFORMATION

We use the information about you for the following purposes:

# 3.1. Information you provide to us:

- 3.1.1. Fulfilling contractual obligations: We use this data to perform contracts between you and us and provide the products, services, and information you request.
- 3.1.2. Information about similar services: We may inform you about other services similar to those you have acquired or shown interest in.
- 3.1.3. Marketing: We may use your data to provide you with information about goods or services that align with our product and service offerings. However, we will only contact you if you have consented previously or when similar to a previous purchase or inquiry.

- 3.1.4. Optimal site experience: To present content on our site in the most effective manner for you and your device.
- 3.1.5. Customer support: Handling your inquiries and complaints related to our site.

## 3.2. Information we collect about you:

- 3.2.1. Site administration: Managing and troubleshooting our site, conducting data analysis, testing, research, statistics, and surveys.
- 3.2.2. Site improvement: Enhancing our site's performance to ensure content is presented optimally.
- 3.2.3. Interactive features: Allowing you to participate in interactive features of our service, as per your preferences.
- 3.2.4. Security measures: Implementing measures to maintain site safety and security.
- 3.2.5. Advertising: Measuring advertising effectiveness and delivering relevant ads to you.
- 3.2.6. Recommendations: Providing suggestions and recommendations for goods or services that may interest you and other users.

### 3.3. Information we receive from other sources:

3.3.1. Combined data usage: We may combine this information with data you provided and data we collected about you, using it for the purposes described above (based on the types of information).

# 3.4. Submission of Personal Information on behalf of another:

If you provide information on behalf of someone else, you must obtain the necessary consent from that person before sharing their information with us. When you provide us with personal information on behalf of another, we assume you obtained necessary consent, and we will process the Personal Information accordingly.

### 4. DISCLOSURE OF YOUR INFORMATION

We may share your personal information with our group members, including subsidiaries, our ultimate holding company, and its subsidiaries as defined in the Companies Act 2008.

- 4.1. Sharing with third parties:
- 4.1.1. Business partners and subcontractors: For contract fulfillment, we may share your data with business partners, suppliers, and subcontractors.

- 4.1.2. Service Providers: When external service providers process information for us, they must enter into a non-disclosure agreement, respecting the confidentiality of your personal information and following our instructions. Some third-party service providers may be located outside South Africa, and we may transfer your data to them for processing.
- 4.1.3. Advertisers and advertising networks: While we do not disclose identifiable information to advertisers, we may provide aggregate information to help them target specific audiences effectively.
- 4.1.4. Analytics and search engine providers: We may share information with providers who help us optimize our site.
- 4.2. Further disclosure:
- 4.2.1. Business or assets sale: If we buy

or sell any business or assets, personal information may be disclosed to the prospective buyer or seller.

- 4.2.2. Change of ownership: In the event of a third party acquiring most of our assets, personal information may be one of the transferred assets.
- 4.2.3. Legal obligation: We may disclose your data if required by law, to comply with legal obligations, enforce our terms of use, or protect our rights, property, and safety or those of our customers and others.

#### 5. WHERE WE STORE YOUR PERSONAL INFORMATION

- 5.1. Data transfer and processing: We may transfer and store your data outside the Republic of South Africa ("RSA") or the European Union ("EU"). Your data may also be processed by staff located outside RSA or the EU, working for us or our suppliers/service providers. By submitting your personal information, you consent to this transfer, storage, or processing. We will take all necessary steps to ensure data security and compliance with this privacy policy, following the Acts.
- 5.2. Data security: All data provided to us is stored on secure servers. If you have a password that grants access to specific parts of our site, keep it confidential and avoid sharing it.
- 5.3. Data retention: We will retain records of personal information for as long as necessary for operational or archiving purposes, unless retention is required or authorized by law. Historical, statistical, or research purposes may require records to be retained longer, with appropriate safeguards against other uses or de-identification.
- 5.4. Internet transmission risk: Transmitting information over the internet is not entirely secure, and despite our best efforts, we cannot guarantee absolute security. Please exercise caution when sharing personal data online. Once we receive your information, we will apply strict procedures and security features to prevent unauthorized access.

#### **6. SOCIAL MEDIA PLATFORMS**

- 6.1. Social media communication: When engaging with us on external social media platforms, consider the platform's terms, conditions, and privacy policies.
- 6.2. Cautionary advice: Be prudent while using social media platforms and avoid sharing sensitive details. For resolving concerns or discussing sensitive matters, we encourage users to contact us through primary communication channels like phone or email.
- 6.3. Links to external websites: Our site may include web links to partner networks, advertisers, or affiliates. Note that each website has its own privacy policy, and we are not liable for them. Check their policies before sharing personal information.

#### 7. INTERCEPTION AND MONITORING OF COMMUNICATIONS

7.1. Communications monitoring: We reserve the right to intercept, monitor, copy, or block communications sent to and from our communication facilities, including our site, emails, and SMS, in accordance with relevant legal provisions.

#### 8. YOUR RIGHTS

- **8.1.** Marketing preferences: You have the right to request that we do not process your personal information for marketing purposes. We will inform you (before data collection) if we plan to use your data for such purposes or disclose it to third parties for marketing. You can exercise this right by adjusting your preferences in the forms we use for data collection or by contacting us at **everts@mikebolhuis.co.za** or using the unsubscribe option in our email communications.
- **8.2.** Third-party websites and social media sites: Third-party websites linked on our site have their own privacy policies. We hold no responsibility for their policies and practices. Before submitting personal information to such websites, review their privacy policies.
- **8.3. Access to information:** Under the Promotion of Access to Information Act 2 of 2000, you have the right to access personal information we hold about you. To obtain this information, submit a written request and payment of the prescribed fee.

### 9. CHANGES TO OUR PRIVACY POLICY

Any changes made to our privacy policy will be posted on this page, and, if appropriate, we will notify you via email (though not obligated to do so). Check back regularly to see updates or changes to this policy.

## 10. CONTACT

For any questions, comments, or requests regarding this privacy policy, please reach out to us at **everts@mikebolhuis.co.za**.