

VAS-X Privacy Policy

Privacy Policy

This Privacy Policy describes management by VAS-X (hereinafter identified as "Controller") of any personal data (as hereinafter specified "Personal Data") relating to a natural person ("Data Subject") identified or can be identified, directly or indirectly by reference to the use, for whatever purpose, of the following website address owned of the Controller: <http://www.vas-x.com> ("Controller's Website").

Purpose

This Privacy Policy is to outline the steps the Controller takes to keep Personal Data confidential, to inform Data Subjects about how and why the Controller collects Personal Data and to provide Data Subjects with its rights and the Controller's contact information to exercise these rights, and for any questions or concerns arising out of this Privacy Policy.

Protecting Data Subject privacy and maintaining the integrity of Personal Data means that: The Controller will keep Personal Data and the business between the Data Subject and the Controller in confidence; The Controller will not sell, rent or loan a Data Subject's information to third parties; The Controller will respect a Data Subject's privacy when the Controller may contact a Data Subject concerning various products and services which the Controller make available to a Data Subject from time to time; The Controller may have control over who obtains, uses and the circumstances to give out information about a Data Subject; A Data Subject will have access to the information that the Controller has about the Data Subject.

Scope

This Policy Privacy applies to the Controller's products, services and websites, except where otherwise noted and does not concern any websites that a Data Subject may visit by external links.

Controllers and Processors of Personal Data

The Controller, who determines the purposes and means of Personal Data collecting and processing, is VAS-X. Registered office:

Fancourt Office Park, Unit 5

Cnr Northumberland & Felstead Road,

Northriding, Gauteng, 2191

South Africa

The processing operations of Personal Data, whether or not by automated means, are performed on behalf of the Controller by VAS-X.

Why the Controller may collect Personal Data

- Establish identity
- Perform necessary identity and security verifications
- Process transactions and conduct business
- Deliver products and services
- Provide customer support and services
- Provide ongoing service delivery
- Provide Data Subject with information
- Improve products, services and service delivery
- Better understand Data Subject's needs, interests and suitability for various products and services
- Recommend specific products and services that may meet Data Subject's needs
- Respond to issues, questions, and queries
- Protect Data Subject and himself against errors or fraud; and
- Co-operate with law enforcement and legal authorities, where required, to comply with applicable laws and with court orders.

Controller will collect, use, and may disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances; and endeavours to collect as little information as possible as may be necessary under the circumstances.

Data Subject takes note that aggregated statistics and information, where the identity of a specific individual cannot be identified, is not Personal Data. Controller reserves the right to use aggregated information in any manner it determines, in its discretion, to be appropriate. Use of such aggregated information may include, but not be limited to, the preparation of aggregated user statistics and information summaries to improve efficiencies, more effectively describe Controller's product and service offerings, and assist in the marketing of Controller's products and services.

Aggregated statistics and information will not contain Personal Data.

The type of Personal Data the Controller may collect

Controller collects various types of Personal Data. While using Controller's Web Site or doing business or interacting with Controller, or receiving products and services from or through Controller, Data Subject may, depending on the nature of the circumstances, be asked to provide Controller with:

- Geographic (physical) addresses
- Demographic information
- E-mail addresses
- Phone numbers or other contact information
- Names (first, and last or whatever the family identifying name is)
- Shipping information
- Billing information
- Transaction history
- Web site usage preferences
- Feedback regarding business, services, web site and public relations
- Source IP addresses

- Times and dates of access to Web site servers
- Language
- Personal preferences
- Product and service preferences
- Browser types and configurations and Miscellaneous administrative and computer traffic information

Certain forms of information, such as government issued or private sector issued licenses, permits, certificates, cards, in driver's licenses, social insurance/security number, passports, insurance cards, voucher numbers, and the like, although convenient for identification, is voluntary.

It is a Data Subject's decision whether he/she wants to provide this, or other suitable identification, subject to any legal requirements.

How does the Controller collect Personal Data?

The Controller will only collect Personal Data that Data Subject has voluntarily provided to the Controller or have agreed to have provided to the Controller. The Controller will not collect any Personal Data about a Data Subject without advising the Data Subject accordingly (either by way of this Privacy Policy or by way of providing the Data Subject with some other form of notice at the time the Controller is requesting or collecting Personal Data), why and how that Personal Data is being collected and how such Personal Data will be used or disclosed. The Controller may collect Personal Data through a variety of means:

- Using the Controller's Web Site
- Using the Controller's services
- During communications with the Controller (face-to-face, by e-mail, by phone, mail or otherwise) during feedback to the Controller regarding the Controller's business, services, website and publications
- When registering with the Controller for services or, where relevant, accounts, or, where relevant, for the download of the Controller's software
- Customer, membership, recipient, or service lists that have been lawfully acquired from third parties
- Through the completion of manual or electronic forms
- Website cookies – Cookies are identifiers that can be sent from a website via a Data Subject's browser to be placed on computer's hard drive of the Data Subject. A Data Subject may elect not to accept cookies by changing the designated settings on the Data Subject's web browser; however, not utilizing cookies may prevent the Data Subject from using certain functions and features of the Controller's Web Site. Information collected from the use of cookies is used to improve the Controller's services
- Web beacons – Web beacons are small, graphic images that allows a website operator to collect certain information and monitor user activity on its website. A web beacon is a very small pixel which is invisible to the user. The Controller uses web beacons to collect information that is not of a personal nature
- Clickstreaming - Clickstreaming is a technology that allows a website operator to track the paths that Data Subject's take as they access a website and look at the site's pages, and as they use links to other sites. The Controller collects such information from visitors to the Controller's Web Site; and



- Website traffic information, which is monitored and analyzed to determine which products, services or features may be of interest to visitors, so the Controller may improve website, products, services, features or other offerings of the Controller.

In addition, the Controller may review and analyze a Data Subject's use of products and services, to help him serve the Data Subject better, and to bring other products and services to the Data Subject's attention, which the Controller feel, will be of benefit to the Data Subject. The Controller also collect and analyze information from other sources for the same purposes.

How the Controller may disclose Personal Information

The Controller does not sell any Personal Data it collects to third parties. The Controller may share Personal Data with its affiliates, subsidiaries, employees, contractors and agents in the course of providing a Data Subject with Controller's business services, support, or the fulfilment or delivery of products or services of the Controller.

The Controller may disclose Personal Data if required to do so by a court of competent jurisdiction, other legal or regulatory authority, or, if there is a good faith belief, and reliance on said belief that disclosure is necessary to: comply with any legal process served on the Controller; maintain, uphold or protect the Controller's rights or property; protect and ensure the personal safety of the public or other Controller's clients; or protect against criminal or quasi-criminal activities, or to detect, prevent, investigate allegations of, or address, misrepresentation or fraud.

The Controller reserves the right that in the event of a bankruptcy filing, mergers with third parties, acquisition by third parties, sale of assets (all or partial), or any other transfer of all or substantially all of the Controller's relevant assets to a third party, that the Controller shall be entitled to share (or sell as an ancillary aspect of the overarching business transaction) the Personal Data provided by the Data Subject to the third party.

Retention and Disposal

The Controller keeps information only for so long as it is needed for the efficient and effective delivery or fulfilment of the software, products, or services using or contemplating using by the Data Subject and for a reasonable time thereafter, or to meet any legal requirements. The Controller will either destroy or remove information when it is no longer needed.

Security and Storage

The Controller endeavours to maintain appropriate physical, procedural and technical security with respect to its' and Processor's offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Data. This also applies to the Controller's disposal or destruction of Personal Data.

The Controller keeps the Personal Data collected about Data Subject strictly confidential. Only authorized personnel have access to this Personal Data. Personnel of the Controller and Processor who have access to Personal Data receive training regarding privacy protection.



The Controller's security specialists build security by design and by default into our computer systems. The aim is to protect information at all times, when it is stored in data files or handled by the Controller's employees. The Controller's systems are also designed to protect information when it is transmitted, for example, between our data processing facilities and corporate offices. Personal Information may be stored or processed in any jurisdiction in which we or our affiliates, suppliers, subsidiaries or agents maintain facilities. By supplying the Controller with Personal Data, you consent to any transfer of this information to other jurisdictions (including countries which have not been assessed for adequacy of privacy laws).

The Controller does, and shall continue to use, industry-standard technology to maintain the security of Personal Data, and for Controller's connections to the internet; however, the Controller cannot and does not guarantee the privacy, security, authenticity or non-corruption of any information transmitted through the internet or any for information stored in any third-party system connected to the internet.

While the Controller takes steps to verify that any service providers, suppliers, or the like with whom the Controller shares Personal Data, are committed to maintaining the privacy of Personal Data at standards that are at least as stringent as the Controller's Privacy Policy and has communicated to them to refrain from making any independent or unauthorized use of any Personal Data, the Controller does not and cannot guarantee the actions, conduct or standards of any such parties.

The Controller shall not be responsible for any claims, damages, costs, or losses whatsoever arising out of or in any way related to third-party connections to or use of the Internet.

The Controller cannot and does not ensure the protection of any Personal Data that Data Subjects provide to a third-party web site that may reference, be referenced or link to the Controller's Web Site. Personal Data collected by these third parties is not subject to, or governed by, this Privacy Policy.

The Controller shall not be responsible for events beyond our direct control, and therefore will not be liable for any direct, indirect, incidental, consequential or punitive damages relating to the uses or releases of Personal Data.

Data Subjects' Rights

Data Subjects are entitled at any time to obtain confirmation of the existence of Personal Data and to be informed of their contents and origin, to verify their accuracy, or else request that such data be supplemented, updated or rectified.

Data Subjects have the right to request erasure, anonymization or blocking of any data that is processed in breach of the law as well as to object in all cases, on legitimate grounds, to processing of the data.

Contact

The Controller is committed to upholding this Privacy Policy. The Controller has policies and procedures in place to educate and assist his employees and contractors in fulfilling their obligations under this Privacy Policy. Controller's policies and procedures will be reviewed on a regular basis and their results of such review will be presented to the Controller's personnel responsible for overseeing privacy matters.

The Controller is committed to treating Data Subjects with the greatest respect and consideration. Data Subject are to advise the Controller of any questions or concerns regarding this Privacy Policy, would like to confirm the accuracy of applicable Personal Data, believes that the privacy of Personal Data has not



been respected, or would like to update or delete incorrect Personal Data, please contact Controller by emailing at privacy@vas-x.com or write to the attention of Privacy Policy Manager, (John.moodie@vas-x.com).

The appropriate Privacy Policy Manager will acknowledge the query and will respond within thirty (30) business days. If the Controller needs to extend timing to respond, or must refuse a Data Subject's request, the Controller will advise the Data Subject accordingly, subject to any legal restrictions.

Age

The Controller is committed to protecting the safety of children. The Controller will not knowingly request or use Personal Data from children under the age of eighteen without parental consent. If the Controller receives actual knowledge, does not knowingly or intentionally collect any Personal Data from children under the age of eighteen, the Controller will take steps to have such Personal Data eliminated. The Controller's Web Site is not to be used by anyone under the age of eighteen. Persons under the age of eighteen are not authorized to use the Controller Web Site and are directed to immediately discontinue use of the Controller's Web Site.

Updates

The Controller may from time to time update this Privacy Policy, with the updated policy to be posted on the Controller's Web Site. The use of Personal Data provided to the Controller prior to the update will continue to be governed by the policy in effect at the time the information was provided. The Controller recommends that Data Subjects revisit this Privacy Policy from time to time on a regular basis.

Consent

In most cases a Data Subject will be asked to specifically express their consent of collecting and processing of Personal Data by the Controller in accordance with this Privacy Policy. Data Subjects will not be obliged to provide such consent.

If a Data Subject does not consent, the Data Subject must immediately discontinue use of the Controller's Web Site and to refrain from further use.

Governing Law and Venue

Where the processing of Personal Data is performed in the context of the activities of the Controller and/or Processor established in South Africa & the European Union. This processing may be subject to South African Protection of Personal Information Act 4 / 2013, EU Regulation 2016/679, and other applicable privacy laws on the protection of natural person with regard the processing of personal data and the free movement of such data, and to the relevant country national law before the competent local court.

The Controller's website is hosted and administered in South Africa.

The Controller will disclose Personal Data without the Data Subjects permission when required by law, or in good faith belief that such action is necessary to investigate or protect against harmful activities to the Controller's company, associates, or property (including this website), or to others.

Cookie Policy

What is a 'cookie'?

A 'cookie' is a small text file that stores Internet settings. Almost every website uses cookie technology. The cookie is downloaded by your Internet browser the first time you visit a website. The next time you visit this website from the same device, the cookie and the information contained in it are either sent back to the originating website (first-party cookies) or to another website to which it belongs (third-party cookies). In that way, the website can detect that it has already been opened using this browser, and in some cases, it will then vary the content it displays.

Some cookies are extremely useful because they can improve your user experience when you return to a previously visited website. This assumes that you are using the same device and the same browser as before; if so, cookies will remember your preferences, will know how you use the website, and will adapt the content you are shown so that it is more relevant to your personal interests and needs.

Your cookie settings on this website

Cookies on this website that do not require approval

Cookies that are essential, also known as 'strictly necessary' cookies, enable features without which you would not be able to use the website as intended. These cookies are used exclusively by VAS-X and are therefore known as first-party cookies. They are only saved on your computer while you are actually browsing the website. An example of why strictly necessary cookies is used is to set the language of your preference when browsing this website.

Another example of what these cookies do is facilitate a switch from HTTP to HTTPS when you change pages, so that the security of data transmitted is maintained. Furthermore, a cookie of this kind is used to store your decision about the use of cookies on our website. Your consent is not required for the use of strictly necessary cookies. Strictly necessary cookies cannot be disabled without losing some of the features of this website.

Categories of cookies

Based on what function cookies have and the purpose for which cookies are used, there are four categories of cookies: strictly necessary cookies, performance cookies, functional cookies and marketing cookies.

Strictly necessary cookies

Are essential to enable you to move around the website and use its features. Without these cookies, some services cannot be provided – for example, remembering previous actions (e.g. the language in which you want to browse this site) when navigating back to a page in the same session.

Performance cookies

Gather information about how a website is used – for example, which pages a visitor opens most often, and whether the user receives error messages from some pages. These cookies do not save information that would allow the user to be identified. The collected information is aggregated, and therefore anonymous. These cookies are used exclusively to improve the performance of the website, and with it the user experience.

Functional cookies

Enable a website to save information which has already been entered (such as user names, languages choices, and your location), so that it can offer you improved and more personalized functions. For example, a website can offer you local information if it uses a cookie to remember the region in which you are currently located. Functional cookies are also used to enable features you request such as playing videos. These cookies collect anonymous information and cannot track your movements on other websites.

Marketing cookies

Are used to deliver adverts and other communications more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and to help measure the effectiveness of advertising campaigns. They remember whether you have visited a website or not, and this information can be shared with other parties such as advertisers. Cookies for improving group targeting and advertising will often be linked to site functionality provided by other organizations.

Your cookie settings on this website.

You can completely disable cookies in your browser at any time

It is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of our site, and we might not be able to provide some features you have previously chosen to use.

How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To opt out of being tracked by Google Analytics across all websites, visit [Privacy Policy – Privacy & Terms – Google](#)

REVISION HISTORY

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