



THE LABOUR FACTORY PTY (LTD)
t/a
COMPETITIVE ADVANTAGE

**The Labour Factory (Pty) Ltd t/a Competitive Advantage - Privacy Policy in
accordance with the provisions of the Protection of Personal Information Act, No
4 of 2013**

1. General

This document is designed to inform you (hereafter referred to as the 'Client') of our (hereafter referred to as 'Competitive Advantage') policies in relation to the collection, processing and usage of Client Information collected on our website and/or social media pages (hereafter referred to as 'Competitive Advantage Website and/or Social Media pages').

By accessing and/or using services available on the Competitive Advantage Website and/or Social Media pages, the Client is giving permission to Competitive Advantage to process Client information as stipulated in this privacy policy.

If you do not agree with any of the terms as stipulated in this privacy policy, you are prohibited from using or accessing the Competitive Advantage Website and/or Social Media pages.

2. Definitions

'Process' means anything that is done with the Client's Information by automated means or otherwise, including but not limited to, organizing, collecting, recording, storing, structuring, adapting and transmission.

'Competitive Advantage' means The Labour Factory (Pty) Ltd a private company with limited liability duly registered in the Republic of South Africa with registration number 2017/367133/07. The Labour Factory (Pty) Ltd is a business with main focus within the Industrial Relations, Human Resources and Business Administration Industries within the borders of the Republic of South Africa.

'Competitive Advantage Website and/or Social Media pages' means the website and/or social media pages of Competitive Advantage accessed by the Client.

'Client' means any user of the Competitive Advantage website and/or social media pages.

'Client Information' means all information processed of the Client including Personal Data, Usage Data and data obtained from Cookies and other tracking technologies.

'Cookies' are small files that are placed on the Client's computer or mobile device or any other device by Competitive Advantage Website and/or Social Media pages collecting details of the Client's browsing history on the Competitive Advantage Website and/or Social Media pages.

'Device' means any device that the Client may use to access the Competitive Advantage website and/or social media pages such as a computer or a cellphone or a digital tablet.





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'Personal Data' means any information that relates to the Client and is collected on the Competitive Advantage Website and/or Social Media pages.

'Service Provider' means any natural or legal person who processes Personal Data on behalf of Competitive Advantage.

'Usage Data' means data collected automatically by the Competitive Advantage Website and/or Social Media pages by usage of the Competitive Advantage Website and/or Social Media pages by the Client.

3. The data collected

The Competitive Advantage Website and/or Social Media pages might collect the following Client Information:

- Personal Data,
- Usage data,
- Tracking technologies and Cookies

Personal Data

The Client may be requested on the Competitive Advantage Website and/or Social Media pages to provide personally identifiable information. This information might be used to contact the Client or determine the Client's identity. This mentioned information may include, but is not limited to, the Client's:

- Email address, and/or
- First name and last name, and/or
- Phone number, and/or
- Physical address, and/or
- Postal address, and/or
- Usage Data

Usage Data

Usage Data is collected automatically by the Competitive Advantage Website and/or Social Media pages and includes, but is not limited to, the Client's:

- Device's Internet Protocol address (for example an IP address), and/or
- browser type, and/or
- browser version, and/or
- the pages the Client visited on the Competitive Advantage Website and/or Social Media pages, and/or
- the time and date the Client visited the Competitive Advantage Website and/or Social Media pages, and/or
- the time the Client accessed the Competitive Advantage Website and/or Social Media pages, and/or
- unique device identifiers, and/or
- specific mobile Device information and/or
- information collected from or sent from the Client's internet browser, and/or
- other diagnostic data.





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Tracking Technologies and Cookies

Competitive Advantage may use various Cookies and/or similar tracking technologies to track the activity on the Competitive Advantage Website and/or Social Media pages. Tracking technologies used could be beacons and/or tags and/or scripts. These Cookies and tracking technologies are mainly used to collect and/or analyse and/or store Client information to assist Competitive Advantage to improve their service offering.

4. How we use Personal Data

The Client Information may be used for the following purposes:

- To develop our service offering, and/or
- To analyse and monitor the usage of the Competitive Advantage Website and/or Social Media pages, and/or
- To assist Competitive Advantage to comply and monitor any quotation requests and/or information requests placed by the Client through the Competitive Advantage Website and/or Social Media pages, and/or
- To contact the Client or provide notifications, updated or new service offering information and/or
- To provide the Client feedback on his/her online order or information about special offerings or regarding general service information. The Client may choose not to receive information regarding special offerings or general service information by written communication to Competitive Advantage, and/or
- To reply to any Client communication to Competitive Advantage, and/or
- Competitive Advantage may further use Client Information for other purposes such as data evaluation.

5. Disclosure of information

Client Information may be disclosed in the following circumstances:

- Competitive Advantage might be party to a sale of business or sale of assets or legal merger. Should Competitive Advantage be a party to any of the above-mentioned processes the Client Information might be disclosed in due course of the process.
- The Client Information is required by law or court order or regulatory authority having jurisdiction over it.
- Competitive Advantage reserves the right to disclose the Client Information if so required to defend the rights of Competitive Advantage.
- Competitive Advantage may disclosure Client Information if required in an investigation regarding user activity on the Competitive Advantage Website and/or Social Media pages or similar reason.

Competitive Advantage may disclose Client Information to a third party as indicated directly below. Any such third party is required by law to process the Client Information in adherence with relevant legislation.

Possible third parties that Competitive Advantage might disclose Client Information to include:

- Client Information might be disclosed with the consent of the Client,





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- Competitive Advantage might disclose Client Information to its business partners and subsidiaries. Business partners could include joint venture partners or subcontractors or advisors or other legal entities under the control of Competitive Advantage or controlled by Competitive Advantage.
- Client Information could be disclosed by the Client on the Competitive Advantage Website and/or Social Media pages by the Client's usage of the Competitive Advantage Website and/or Social Media pages and interaction on platforms or aspects that allow public access.

6. Information Security

Competitive Advantage is obliged by law to adequately protect Client Information. Adequate protection means that Competitive Advantage will take commercially acceptable steps to protect Client Information. Competitive Advantage can however not guarantee 100% protection and security of Client Information.

7. Transfer of Client Information

Third parties may process Client Information outside of the borders of the Republic of South Africa. Client Information could thus possibly be transferred to legal jurisdictions outside of the Republic of South Africa and these jurisdictions may have different laws applicable to the processing of data. The Client specifically agree to a transfer of Client Information as indicated in this paragraph by usage of the Competitive Advantage Website and/or Social Media pages.

8. Retention of Client Information

Competitive Advantage will only retain Client Information for the period of time that is necessary to attain the purpose as indicated in this privacy policy.

Competitive Advantage is further guided and obliged to comply with any applicable legislation in relation to the retention period of Client Information.

9. Client rights

The Client may request Competitive Advantage to update and/or correct and/or delete Client Information.

Any request to update and/or correct and/or delete Client Information must be submitted in writing to Competitive Advantage.

The Client may inform Competitive Advantage in writing that he/she retracts his/her permission for Competitive Advantage to process his/her Client Information in accordance with this privacy policy.

