

## Privacy Policy

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At Aquila d'Oro, we take your privacy and your trust in us very seriously. This privacy policy provides you with information about how we collect, use and disclose your personal information.

This privacy policy applies when you visit or use our websites, apps and other services, including events, that refer or link to this privacy policy (each, a "Service"). This privacy policy may be supplemented by additional privacy statements, terms or notices provided to you.

The Aquila d'Oro company that owns or administers the Service, as identified therein, is the primary controller of your personal information provide to, or collected by or for, the Service.

We will indicate within the registration processes of our products and services and other registration forms what types of personal information are required and those that are requested. You may choose not to submit the requested information, but that may limit or prohibit the services that Aquila d'Oro is able to provide to you.

For information about the handling of personal information contained in our service content, such as in case law, please read our Fair Processing Statement.

## 2. Information We Collect

We collect information about you in three ways: directly from your input, from third-party sources, and through automated technologies.

### 2.1 Data You Provide to Us

The types of personal information that we collect directly from you depends on how you interact with us and the Service, which may include:

- Contact details, such as your name, email address, postal address, social media handle, and phone number;
- Account login credentials, such as usernames and passwords, password hints and similar security information;
- Other account registration and profile information, such as job title, educational and professional background and qualifications, and photo;
- Payment information, such as a credit or debit card number;
- Comments, feedback and other information you provide to us, including search query data and questions or information you send to customer support; and/or
- Interests and communication preferences, including preferred language.

## **2.2 Data From Your Organisation**

We may obtain personal information about you from the organisation with which you are employed or affiliated in order to activate and manage your access to and use of the organisation's subscription to the Service, including:

- Contact details, such as your name and organisational email address, postal address, and phone number;
- Other account registration information such as job title; and/or
- Organisational user ID

## **2.3 Data From Other Sources**

We also may obtain contact details and other information about you from our affiliates and from other third parties, including:

- Social networks when you grant permission to the Service to access your data on one or more networks;
- Service providers that help us determine a location in order to customise certain products to your location;
- Businesses with which we offer co-branded services or engage in joint marketing activities; and/or
- Publicly-available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

## **2.4 Data From Service Use, Including Cookies**

The Service may automatically collect information about how you and your device interact with the Service, including:

- Computer, device and connection information, such as IP address, browser type and version, operating system and other software installed on your device, mobile platform and unique device identifier and other technical identifiers, error reports and performance data;

- Usage data, such as the features you used, the settings you selected, your URL click stream data, including date and time stamp and referring and exit pages, search terms you used, and pages you visited or searched for on the Service;
- For educational Services, the course modules and test questions you view, answer or complete; and/or
- For location-aware Services, the region, city or town where your device is located in order to provide you with more relevant content for where you are in the world.

We collect this data through our servers and the use of cookies and other technologies. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. We may use cookies and other technologies to store your preferences and settings, help you with signing in, provide targeted ads and analyse site operations. You can control cookies through your browser's settings and other tools. However, if you block certain cookies, you may not be able to register, login, or access certain parts or make full use of the Service. For more details, see the cookie policy of the Service.

### **3. How We Use Your information**

Depending on how you interact with us and the Service, we use your personal information to:

- Provide, activate and manage your access to and use of the Service;
- Process and fulfil a request, order, download, subscription or other transaction;
- Provide technical, product and other support and to help keep the Service working, safe and secure;
- Enhance and improve the Service and our other products, events, and services and to develop new products, services and benefits;
- Offer you customised content and other personalisation to make the Service more relevant to your interests and geography;
- Respond to your requests, inquiries, comments and concerns;
- Notify you about changes, updates and other announcements related to the Service and our other products and services;
- Deliver targeted advertisements, promotional messages, notices and other information related to the Service and your interests;
- Provide you with promotional messages and other information about products, events and services of ours, our affiliates and third parties such as sponsors;
- Invite you to participate in user testing and surveys as well as drawings, competitions and similar promotions;
- Identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns and evaluating our business performance, or in other ways pursuant to a customer agreement; and/or
- Comply with our legal obligations, resolve disputes, and enforce our agreements.

If you are an administrator of an organisation with a subscription to the Service, we will use your details to communicate with you about your organisation's subscription and related

services. If you supply us contact information of your colleagues, we may contact those individuals with communications about the Service that may include reference to you.

## **4. Sharing of Your Information**

### **4.1 Your Organisation**

If you access the Service through a contract administered by your organisation, your personal information and certain usage data gathered through the Service may be accessed by or shared with the administrators authorised by your organisation for the purposes of usage analysis, contract management and compliance, training, performance and remediation, cost attribution and departmental budgeting.

### **4.2 Our Service Providers**

Dependent upon the Services provided, we share information with:

- Our service providers, suppliers, agents and representatives, including but not limited to, payment processors, customer support, email service providers, event venues and service providers, IT service providers, marketing service providers, research providers, mailing houses and shipping agents;

to process the information as necessary to provide the Service, complete a transaction or fulfil your request or otherwise on our behalf based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures.

### **4.3 For Legal Reasons**

We also will disclose your personal information if we have a good faith belief that such disclosure is necessary to:

- meet any applicable law, regulation, legal process or other legal obligation;
- detect, investigate and help prevent security, fraud or technical issues; and/or
- protect the rights, property or safety of Aquila d'Oro, our users, employees or others; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or merger with another company.

## **5. Grounds for Processing**

When we collect or otherwise process any personal information within the scope of South African data protection laws, we do so:

- where necessary to provide the Service, fulfil a transaction or otherwise perform a contract with you or at your request prior to entering into a contract;
- where necessary for our compliance with applicable law or other legal obligation;
- where necessary for the performance of a task carried out in the public interest;
- where necessary to enable our customers to comply with their legal obligations;

- where applicable, with your consent; and/or
- where necessary to operate our business, protect the security of our systems, customers and users, detect or prevent fraud, or fulfil our other legitimate interests as described in sections 2-4 above, except where our interests are overridden by your privacy rights.

Where we rely on your consent to process personal information, you have the right to withdraw your consent at any time, and where we rely on legitimate interests, you may have the right to object to our processing.

## **6. Data Retention**

We retain your personal information for as long as necessary to provide the Service and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements. If you access the Service through a contract administered by your organisation, we retain your organisational contact details after the termination of your organisation's subscription to continue to communicate with you.

## **7. Locations of Processing**

Your personal information may be stored and processed in your region where Aquila d'Oro maintain servers and facilities. We take steps, including through contracts, intended to ensure that the information continues to be protected wherever it is located in a manner consistent with the standards of protection required under applicable law.

## **8. Data Security**

We implement technical and organisational measures to seek to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information.

## **9. Children's Privacy**

We do not knowingly collect information from children under the age of 13 or target the Service to children under 13.

## **10. Your Communications Preferences**

You can customise and manage your communications preferences and other settings when you register with the Service, by updating your account features and preferences, by using the "opt-out" mechanisms such as "unsubscribe" or other means provided within the communications that you receive, or by contacting us. We reserve the right to notify you of changes or updates to the Service whenever necessary.

## **11. Accessing and Updating Your Information**

## **11.1 Your Account**

The Service may allow registered users to directly access and review their account information upon login at any time. Keeping such information up to date is the responsibility of the user.

## **11.2 Your Rights**

You have the right under South African and certain other privacy and data protection laws, as may be applicable, to request free of charge:

- access to your personal information;
- rectification or erasure of your personal information;
- restriction of our processing of your personal information, or to object to our processing; and
- portability of your personal information.

If you wish to exercise these rights, please submit your request in writing via email to [humancapital@agl-unl.co.za](mailto:humancapital@agl-unl.co.za). We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

## **12. Changes**

We will update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Service or by other means.

## **13. Contact**

The data protection representative for our businesses that are processing personal data within the scope of South African data protection laws for Aquila d'Oro is Marc Bovim.

If you have any questions, comments, complaints or requests regarding this privacy policy or our processing of your information, please contact us via our email to [humancapital@agl-unl.co.za](mailto:humancapital@agl-unl.co.za)

You may also lodge a complaint with the data protection authority in the applicable jurisdiction.

## **14. Supplementary Notices**

### **14.1 Authors / Contributors**

Where we contract with you to produce content for any of our services, such as to write legal analysis, reviews, guidance or legal opinion for dissemination to our subscribers, we will process some personal information about you. Such information includes:

- name, organisation, and contact details;

- professional experience, role, practice area, affiliations and subject expertise;
- professional biography or profile produced or approved by you, including your image, likeness or voice, which may be published within our services and made available to our subscribers alongside any content produced by you for Aquila d'Oro;
- financial information in order to facilitate payments for works produced;
- editorial and reviewer commentary and feedback as part of peer review; and
- administration information such as author work progress updates.

The above information is processed in order to facilitate the publication of the work and to administer, manage and fulfil our contract with you.

You may choose not to be contacted by Aquila d'Oro to produce content for us by contacting us via the communications that you receive from our content development teams, or via the contact details provided within this policy.

Please refer to the main section of this privacy policy for details on your rights, retention, locations of processing, and contact details for any privacy and data protection enquiries.

### **Aquila d'Oro Fair Processing Statement**

Some of the content that we provide within our database services, by its very nature, includes personal information. This fair processing statement provides details about the personal information contained in our service content. This includes names, email addresses, physical addresses, phone numbers and details to ensure the Service can be executed. This information is processed in accordance with the Protection of Personal Information Act (POPIA).

#### **Nominated Information Officer:**

Marc Bovim

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