



B DOYLE & ASSOCIATES GROUP

Corporate Consultants | Company Secretarial Services | Legal Services

Eastgate Lane, Block D, East Wing, 1ST Floor, 5 Iris Road, Bedfordview, 2008

P O Box 753346, Gardenview, 2047 | T: 011 268 6652 | E: info@bdoyle.co.za

www.bdoyle.co.za

Privacy Policy

Last updated: 19 March 2020

This privacy notice is for visitors to our websites, apps and other digital platforms. Please read this privacy policy carefully as it sets out our collection, use, disclosure, retention and protection of your personal information and gives information on how to exercise your legal rights.

This Privacy Notice may be relevant to you even if you are not a customer of ours, and have never used a website, application or service of ours. We may have your personal information because we have received it from a user of a website, application or service of ours.

B Doyle & Associates Group ("B Doyle") is committed to protecting the privacy of users of its website and services.

1. The Information we collect

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services (including free trials); this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- use our applications, which may include the collection of metadata;
- complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- interact with us using social media;
- interact with us through our chatbots;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, fax, SMS, email or post.

We will also collect your information where you only partially complete and/or abandon any information inputted into our website and/or other online forms and may use this information to contact you to remind you to complete any outstanding information and/or for marketing purposes.

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Members: M Templeton, L Templeton, GM Bishop



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We also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites, applications or services (for example, we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information).

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

B Doyle does not knowingly collect personally identifiable information from anyone under the age of 16. If it is discovered that we have collected PII from someone under 16 we will promptly delete that information.

2. Providing us with information about others

If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent or otherwise have a legal basis to provide us with the information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

3. How we use your information

To the extent permissible under applicable law, we use your information to:

- provide any information and services that you have requested or any applications or services that you have ordered;
- compare information for accuracy and to verify it with third parties;
- provide, maintain, protect and improve any applications, products, services and information that you have requested from us;
- manage and administer your use of applications, products and services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, website, applications and services and provide an enhanced, personal, user experience for you;
- undertake internal testing of our website, applications, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymize any information used for such purposes, and ensure it is only displayed at aggregated levels which will not be linked back to you or any living individual;
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- comply with any other of our regulatory or legal obligations;

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- detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- to monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual except as permitted by law;
- deliver targeted advertising, marketing (which may include in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
- deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and
- provide you with location-based services (for example, advertising and other personalised content), where we collect geo-location data.

To the extent permitted by applicable law, we retain information about you after the closure of your B Doyle account, if your application for a B Doyle account is declined or if you decide not to proceed. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with our website, applications and services;
- comply with our legal or regulatory obligations;
- collect information about how you and users use the functions of the features of our website, applications and services; and
- gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

In addition to the purposes described in this section, we may also use information we gather to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful, based on your use of the website, applications or services or any other information we have about you (depending on the websites, applications or services, you may be able to configure these features to suit your preferences).

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We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

4. Mobile data

We may obtain information through mobile applications that you or your users install on their mobile devices to access and use our website, applications or services or which you or your users use to provide other services related to that mobile application (for example, to sync information from our application or service with such mobile application). These mobile applications may be our own mobile applications or those belonging to third parties. Where the mobile application belongs to a third party, you must read that third party's own privacy notice as it will apply to your use of that third-party mobile application. We are not responsible for such third-party mobile applications and their use of your personal information.

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services. For example, activity undertaken within a mobile application may be logged.

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.

5. Data analytics and benchmarking

We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and/or solutions and the best experience. These purposes include to:

- deliver advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of services;
- carry out research and development to improve our services, products and applications;
- develop and provide new and existing functionality and services (including statistical analysis, benchmarking, insights, receipt recognition and cashflow forecasting services); and
- provide you with location-based services (for example location relevant content) where we collect geo-location data to provide a relevant experience.

Please be aware that our use may include personal information of your individual clients, suppliers, employees and other individuals whose information you input into any of our websites, applications or services.

Any individual whose personal information we process has the right to object to processing based on our legitimate interests, and if you wish to do so, please contact us at info@bdoyle.co.za

6. Sharing your information



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We may share your information with:

- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- partners, including system implementers, resellers, value-added resellers, independent software vendors and developers that may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third-party application providers);
- credit reference and fraud prevention agencies;
- Government bodies, regulators and any other third party necessary to meet our legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- another organisation to whom we may transfer our agreement with you; and
- Government departments where reporting is mandatory under applicable law.
- If B Doyle is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information;

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties but this will not include information that can be used to identify you.

7. Marketing

From time to time, we may use your information to contact you with details about our applications, products and services which we feel may be of interest to you. If you wish to exercise these rights you can do so by sending us an email to info@bdoyle.co.za. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

8. Third party platform advertising



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Where you respond to communications we post on third-party platforms (such as LinkedIn, Instagram, Facebook, Google and Twitter), we may also share your information with those third parties in order to serve targeted advertising/content to you via the relevant third-party platform based on your profile/interests. Your information is used by the third-party platform provider to identify your account and serve advertisements to you. You can control what advertisements you receive via the privacy settings on the relevant provider's platform and you should consult the third party's help/support centre for more information.

9. Your information and your rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible ("data portability");
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner's Office).

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date by sending an e-mail to info@bdoyle.co.za. You will need to provide sufficient identifying information, such as your name and email address and possible additional identifying information as a security precaution.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with our Data Retention Policy or as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

10. Changes to this Privacy Notice

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We may change this Privacy Notice from time to time. However, we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Notice).

11. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your information which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at info@bdoyle.co.za.

12. Transfers outside of the European Economic Area and the UK

By using our website, products or services or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer of your information outside the EEA in the circumstances set out in this Privacy Notice. If you do not want your information to be transferred outside the EEA you should not use our website, applications or services.

13. Other sites and social media

If you follow a link from our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third-party social media account(s) to manage what personal information you enable us to access from that account.

14. Cookies, analytics and traffic data

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications and services better for you.



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Our cookies may be **session cookies** (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or **persistent cookies** (cookies which enable our websites, applications or services to “remember” who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

We use the following types of cookies:

Category	Description
Where strictly necessary	These cookies and other technologies are essential in order to enable the Services to provide the feature you have requested, such as remembering you have logged in. These cookies are also used to prevent fraudulent use of login credentials and ensure security of user data. These cookies contain information regarding the user’s institution through which the user has access and/or the user’s IP address including regional geographic information connected to such IP address.
For functionality/preferences	These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of the Services more tailored.
For performance and analytics	These cookies and similar technologies collect information on how users interact with the Services and enable us to improve how the Services operate. For example, we use Google Analytics cookies to help us understand how visitors arrive at and browse our products and website to identify areas for improvement such as navigation, user experience, and marketing campaigns.
Targeting Cookies or Advertising Cookies.	These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They remember the websites you have visited and that



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Category	Description
	information is shared with other parties such as advertising technology service providers and advertisers.
Social media cookies.	These cookies are used when you share information using a social media sharing button or “like” button on our websites or you link your account or engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.
Web beacons and parameter tracking	We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.
IP Address and traffic data	We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours and the website you visit after leaving our site. We also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

15. Onward Transfer of Information

B Doyle may work with other organisations that provide specific services for us, such as credit card processing. We will provide only the personal information necessary for the third party to provide these services for us. These organizations may not use personal information except for the purpose of providing these services.

B Doyle may also transfer personally identifiable information to third parties, including third parties located internationally, such as applicable publishers, other content providers, and libraries, who can better assist with your inquiries, to facilitate order fulfilment and to enable them to inform users of services provided by B Doyle and/or the third parties’ products and services that may be of interest. We require that these parties agree to process such information based on our instructions and in

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compliance with this Privacy Policy and any other appropriate security measures. In addition, when transferring personally identifying information that is subject to the European Union's General Data Protection Regulations (GDPR), we require a GDPR-approved transfer mechanism to be in place, such as Binding Corporate Rules or Privacy Shield Certification.

In addition, we may share general usage data in aggregated form so that no personal information is identifiable to participating institutions, content providers, researchers, and the general public.

16. Your Consent; Opting Out

By using our Websites, you consent to the collection and use, in accordance with this policy, of the information you provide to us. We will remove you and your personally identifiable information from our records or refrain from using your personally identifiable information in connection with certain services on request if you contact us with your requests at info@bdoyle.co.za. Please note that this may prevent you from accessing our websites and services if we require this information in order to perform in terms of our service level agreement.

You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these e-mails or you can contact us at info@bdoyle.co.za.

17. Enforcement and Dispute Resolution

We engage in periodic self-assessment to ensure compliance with our Privacy Policy. We verify that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and where applicable, in conformity with the GDPR. We encourage interested persons to raise any concerns with us using the contact information below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this policy.

If you have an unresolved privacy or data concern that we have not addressed satisfactorily, European Union data subjects may seek an administrative or judicial remedy or to lodge a complaint with a supervisory authority, in particular in the member state of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. Information on how to file such a complaint is available here http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

For South African data subjects information on how to file a complaint or contact the Information Regulator is available here <http://www.justice.gov.za/inforeg/>.

18. Contact us

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