



Easycost Time obo Murlo Online Pty Ltd ([www.murloonline.com](http://www.murloonline.com))

Address: Johannesburg, South Africa

Privacy Policy ( In compliance with POPIA)

Updated: 31 March 2022

Email Address: [info@easycosttime.co.za](mailto:info@easycosttime.co.za)

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# **Easycost Time obo Murlo Online (Pty) Ltd Manual to Accessing and the Protection of Information**

prepared in accordance with

The Protection of Personal Information Act 4 of 2013 (“POPIA”)

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## **Privacy Notice**

This is the privacy notice of Easycost Time obo Murlo Online Pty Ltd. In this document, "we", "our", or "us" refer to Easycost Time obo Murlo Online Pty Ltd and all of its clients for which we develop, manage, maintain and update software and websites.

We are company number 2017/660606/07 registered in South Africa.

Our registered office is at Johannesburg, South Africa – we are fully functional online.

## **Introduction**

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.

Our policy complies with the Protection of Personal Information Act 2013.

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal information.



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Except as set out below, we do not share, sell, or disclose to a third party, any information collected through our website or software.

## 1. Information Officer

We have appointed an Information Officer who is responsible for ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Information Officer, Wernich Schuld at [Click for email](#).

## 2. Information we process

We may collect, use, store and transfer different kinds of personal information about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiable information that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial information includes information such as your bank account and payment card details.



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Transaction information includes details about payments or communications to and from you and information about the products and services you have purchased from us.

Technical information includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or software.

Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, company details, car information, feedback and survey responses.

Marketing information includes your preferences in receiving marketing from us; communication preferences; responses, and actions in relation to your use of our services.

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is information that does not identify you as an individual. Aggregated information may be derived from your personal information but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile information to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information, and it will be used in accordance with this privacy notice.



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### **3. Special personal information**

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, trade union membership, information about your health and biometric data.

We may collect special personal information about you if there is a lawful basis on which to do so.

### **4. If you do not provide personal information we need**

Where we need to collect personal information by law, or under the terms of a contract, we have with you, and you fail to provide that information when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

## **The bases on which we process information about you**

### **5. Information we process because we have a contractual obligation with you**

When you create an account on our website or software, buy a product or service from us, or otherwise agree to our terms and conditions and privacy policy, a contract is formed between you and us.



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In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website or software

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **6. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or software or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information.



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Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our privacy policy and terms and conditions.

If you have given us explicit permission to do so, we may from time to time, pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at email address or webpage. However, if you do so, you may not be able to use our website, software or our services further.

## **7. Information we process for the purposes of legitimate interests**

We may process the information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your information, and whether you would, in the round, consider it reasonable to do so



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For example, we may process your information on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our organizational or business.
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage organizational or business risk
- protecting your interests where we believe we have a duty to do so

## **8. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorization such as a search warrant or court order.

This may include your personal information.





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## **Specific uses of information you provide to us**

### **9. Information provided on the understanding that it will be shared with a third party**

Our website, software and social media pages, allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message on our forum and social media posts
- tagging and commenting on an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks or any other emoticon.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.



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Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion, we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at email address or webpage.

## **10. Complaints regarding content on our software or website**

Our website, software and social media pages is a publishing medium. Anyone may register and then publish information about himself, herself or some other person.

We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website or software, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.



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## **11. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website, software or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website or software of Payfast / SagePay / WorldPay / OPayo / PayPal or some other reputable payment service provider. That page may be branded to look like a page on our website or software, but it is not controlled by us.

## **12. Information about your direct debit**

When you agree to set up a direct debit arrangement, the information you give to us is passed to our own bank ABSA Bank for processing according to our instructions. We do not keep a copy.

## **13. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for seven years before destroying or deleting it.



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## **14. Communicating with us**

When you contact us, whether by telephone, through our website, whatsapp or by e-mail, we collect the information you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business/organization.

We keep personally identifiable information associated with your messages, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## **15. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.



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## **16. Affiliate and business partner information**

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognize visitors that you have referred to us, and to credit to your commission due for such referrals. It also includes information that allows us to transfer the commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

## **Use of information we collect through automated systems when you visit our website or software**

### **17. Personal identifiable information from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website or software are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website or software, such as the type of computer or device and the screen resolution.



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We use this information in aggregate to assess the popularity of the webpages on our website or software and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the information possibly could be used to identify you personally, even if you are not signed in to our website or software.

## **Disclosure and sharing of your information**

### **18. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive information that is indirectly made up from your personal information from third parties whose services we use.

### **19. Third-party advertising on our website or software**

Third parties may advertise on our website or software. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website or software.

They may also use other technology such as cookies or JavaScript to personalize the content of, and to measure the performance of their adverts.



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We do not have control over these technologies or the information that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

## **20. Credit reference**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

## **21. Information may be processed outside South Africa**

Our websites and software are hosted in Germany by Hetzner.

We may also use outsourced services in countries outside South Africa from time to time in other aspects of our business.

Accordingly, information obtained within South Africa or any other country could be processed outside South Africa.

For example, some of the software our website uses or our software may have been developed in the United States of America or Australia.



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## **Control over your own information**

### **22. Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

### **23. Access to your personal information**

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website or software.

To obtain a copy of any information that is not provided on our website or software you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **24. Removal of your information**

If you wish us to remove personally identifiable information from our website or software, you should contact us to make your request.

This may limit the service we can provide to you.





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## **25. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Other matters**

### **26. Use of our website or software by children**

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website or software only with consent from a parent or guardian

### **27. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or another trust mark in your browser's URL bar or toolbar.



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## **28. How you can complain**

If you are not happy with our privacy policy or if you have any complaint then you should tell us.

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in the process of mediation or arbitration.

## **29. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

## **30. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website or software.



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Please note that we have extra protective measures in place to ensure that any personal information that is stored is safe from any person who does not have permission to access it. We make use of Yubikey Security keys when we have to access any data, we also make use of BitWarden to ensure that all our passwords are complicated and have not been exposed in any way. We have a cybersecurity specialist who is constantly checking and making sure that none of our data is accessed by any unauthorised person/individual/entity or company. All the hardware that we use has Kaspersky anti virus on them and we make sure that we do multiple checks daily to ensure there are no threats. We also do not store any data in hard copy form on site, it is all stored in encrypted, password and 2FA servers. If any data should ever be in hard copy form (ex. Paper), for professional reasons, we will destroy it immediately after use. Our hardware ( PC and laptops) are all protected with passwords & 2FA upon logging in, and are kept in an office that gets locked when nobody is present, all hard drives are labelled and kept in locked drawers and need security keys to access any information. We will also never send any email or message with your personal information in it to you, if we do send any email with personal information in it, we will first ask you to enter a unique identifier, such as your ID number etc to access the information sent and this information would then be in pdf format. We are constantly making sure that we practice safety measures multiple times daily and we are constantly ensuring that we are improving more and more, so that we keep your data as safe as possible.

## **31. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website or software on the day you use our website or software. We advise you to print a copy for your records.



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If you have any question regarding our privacy policy, please [contact us](#).

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