



Privacy Policy

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Introduction

Welcome to our privacy policy. We are Larc AI (Pty) Ltd (Registration number: 2018/298268/07) and/or Larc Technologies (Pty) Ltd (Registration number: 2015/381561/07 (“we”) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (personal information).

Audience

This policy applies to you if you are:

- a visitor to our website or application; or
- a customer who has ordered or requested the goods or services that we provide.

What is personal information?

Personal information includes:

- certain information that we collect automatically when you visit our website or application;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;

- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us.

Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

Sensitive personal information

Depending on the goods or services that you require, we may also collect sensitive personal information including your or your clients':

- **financial information** – such as your bank account details;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **sexual information** – such as information about your sex life or sexual orientation;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings; and
- **employment information** – including your membership of a trade union.

Acceptance

Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

Legal capacity

You may not access our website or application or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so. You may only process data using any of our products provided that you have the necessary consent and must manage the information lifecycle in terms of industry best practice.

How do we collect personal information?

On submission of an enquiry or registration or use of our products

When you submit an enquiry or if you register on our website or application, you will no longer be anonymous to us. We can also gain access to personal information of third parties if you use our products to process your clients' personal information.

This personal information may include:

- names and surnames;
- email addresses;
- telephone numbers;
- company names, company registration numbers, and VAT numbers;
- postal addresses or street addresses;
- your username and password; and
- any other information contained in a document or form that we ask for or that you process using our product.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, for providing services to you as agreed and for any other purposes set out in this policy.

On order or request

When you order our goods or request our services from us, you will be asked to provide us with additional information on a voluntary basis (goods or services information).

Events

You will provide us with personal information when you attend an event that we host.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website or application, and the dates and times that you visit the website or application, paths taken, and time spent on sites and pages within the website or application (**usage information**). Please note that other website or applications visited before entering our website or application might place personal information within your URL during a visit to it, and we have no control over such website or applications. Accordingly, a subsequent website or application that collects URL information may log some personal information.

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Cookies

For information on how we deal with cookies, please refer to our Cookies Policy.

Web beacons

Our website or application may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website or application.

Optional details

You may also provide additional information to us on a voluntary basis (**optional information**). This includes content or products that you decide to upload or download from our website or application or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website or application.

Recording calls and correspondence

We may monitor and record any telephone calls and monitor tickets, emails or other forms of correspondence that you make to us, unless you specifically request us not to and provided that we are satisfied that it is not necessary to control service levels.

Who are our data subjects?

We process the personal information of the following categories of people:

- customers or organisations,
- prospects or leads,
- employees,
- recruiters and medical practitioners providing services related to employees,
- contractors, vendors, or suppliers,
- children and their guardians,
- debtors and creditors,
- dealers, and
- directors and shareholders.

Purpose for processing

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as:

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- collecting orders or requests for and providing our goods or services,
- managing our contracts with various data subjects,
- managing customer credit in general,
- processing customer requests or complaints,
- keeping our data subject records and information up to date,
- better understanding our data subject’s needs, and
- providing support to our customers.
- **marketing purposes** – such as:
 - marketing to customers,
 - marketing to prospects, and
 - running promotional competitions for business.
- **business purposes** – such as:
 - managing employees in general,
 - internal audit,
 - accounting, and
 - business planning and due diligence, and joint ventures, disposals of business, or other proposed and actual transactions.
- **legal purposes** – such as:
 - handling claims and enforcing debts, and
 - complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website or application;
- monitor website or application usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website or application.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the website or our products. In some cases, we may also send you primarily promotional messages.

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You can choose to opt-out of promotional messages. We may wish to provide you with information about new goods or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages.

Targeted content

While you are logged into the website or application, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website or application identifying that a customer is visiting from the website or application. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website or application however, the advertiser is able to collect your personal information.

Reasons we share personal information

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate. This may include information that you submit when using our product, however, we will only share third party information to the extent agreed to between us and with the intent to deliver goods or services.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website or application. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

Security

There is no such thing as 'perfect security'. We have to compromise between increased levels of security and the convenience to you in transacting with us.

Our security responsibilities

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration, and destruction.

Our hosting company will host our website or application in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our security disclaimers

Please note the following:

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The third parties whose systems we link to are responsible for the security of information while it is collected by, stored on, or passing through the systems under their control.

We will use all reasonable endeavours to ensure that our website or application and your information is not compromised. However, we cannot guarantee that no harmful code will enter our website or application (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using website or applications (addressed below).

If you experience a problem or loss that is caused by information you provided to us, your computer being compromised in some way or by something beyond our control, we cannot take responsibility for causing the problem. We will, however, do our best to help you if we can.

Phishing

In the event that you are using AIForged you must access it through the the AIForged application available in the Microsoft store or by following the link on the AIForged website accessible <https://www.aiforged.com> pointing to the AIForged solution.

Accurate and current

We will try to keep the personal information we collect as accurate, current, complete, confidential and reliable for the purposes defined in this policy. From time to time we may request you to update your personal information on the website or application. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

Transfer to another country

We send personal information outside of South Africa to various countries. We will only transfer data to other countries who have similar privacy laws to South Africa's that provide an adequate level of protection, or recipients who can guarantee the protection of personal information to the same standard we must protect it.

Your rights

Request what information we hold on you

You may request access to your personal information to receive a copy of the personal information that we hold on you.

Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or application or contacting us by phone or email.

Withdrawal of consent or objection to processing

You may withdraw your consent where we are relying on consent as a lawful justification to process. You may also object to our processing where we are relying on another lawful justification for processing. Please note that if you do so, we might not be able to provide services to you.

We may need to request additional information from you to verify your identity for you to access these rights. This is to ensure that your personal information is not disclosed to an unauthorized person.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or application or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website or application and our goods or services. If you continue to use the website or application or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party website or applications.

Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.