



# Privacy Policy

# PRIVACY POLICY

## What is this Privacy Policy for?

We take privacy very seriously. This privacy policy is for this website <https://culcha.co.za/> as well as the Culcha system at <https://app.culcha.co.za/> and governs the privacy of its users who choose to use it. We encourage you to read this Policy carefully. It will help you make informed decisions about sharing your personal information with us.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores, and protects user data and information will also be detailed in this policy.

## Culcha Collects Your Personal Information

Culcha involves the storage of Data about a company or individual. That Data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, bank account details, taxation details, and accounting and financial information.

Culcha may collect personal information directly from you when you:

- Register to use the Service.
- Use the Service.
- Post to the Culcha Community forum or on our blog.
- Contact the Culcha support team.
- Visit our Website.

You can always choose not to provide your personal information to Culcha, but it may mean that we aren't able to offer you the Service.

## Culcha may receive Personal Information from you About Others

Through your use of the Service, Culcha may also collect information from you about someone else. If you provide Culcha with personal information about someone else, you must ensure that you are authorised to disclose that information to Culcha and that, without Culcha taking any further steps required by applicable data protection or privacy laws, Culcha may collect, use and disclose such information for the purposes described in this Policy.

This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, Culcha's identity, and how to contact Culcha.

Where requested to do so by Culcha, you must also assist Culcha with any requests by the individual to access or update the personal information you have collected from them and entered into the Service.



## Culcha Collects, Holds, and Uses your Personal Information for Limited Purposes

Culcha collects your personal information so that we can provide you with the Service and any related services you may request. In doing so, Culcha may use the personal information we have collected from you for purposes related to the Services including to:

- Verify your identity.
- Administer the Service.
- Notify you of new or changed services offered concerning the Service.
- Carry out marketing or training relating to the Service.
- Assist with the resolution of technical support issues or other issues relating to the Service.
- Comply with laws and regulations in applicable jurisdictions and communicate with you.

By using the Service, you consent to your personal information being collected, held and used in this way and for any other use you authorise. Culcha will only use your personal information for the purposes described in this Policy or with your express permission.

It is your responsibility to keep your password to the Service safe. You should notify us as soon as possible if you become aware of any misuse of your password, and immediately change your password within the Service or via the "Forgotten Password" process.

## Culcha Takes Steps to Protect Your Personal Information

Culcha is committed to protecting the security of Your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates issued by a leading certificate authority, and all Data transferred between you and the Service is encrypted.

However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information to the Service within a secure environment.

We will advise You at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

## Culcha Only Discloses Your Personal Information in Limited Circumstances

Culcha will only disclose the personal information you have provided to us to entities outside the Culcha group of companies if it is necessary and appropriate to facilitate the purpose for which your personal information was collected under this Policy, including the provision of the Service.

Culcha will not otherwise disclose your personal information to a third party unless you have provided your express consent. However, you should be aware that Culcha may be required to disclose your personal information without your consent to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.



The third parties who host our servers do not control and are not permitted to access or use your personal information except for the limited purpose of storing the information. This means that, for South African privacy legislation and South African users of the Service, Culcha does not currently "disclose" personal information to third parties located overseas.

## Culcha Does Not Store Your Credit Card Details

If you choose to pay for the Service by credit card, your credit card details are not stored by the Service and cannot be accessed by Culcha staff. Your credit card details are encrypted and securely stored by an Accredited Third-Party Service Provider to enable Culcha to automatically bill your credit card repeatedly.

## Our Commitment to Data Security

Culcha uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We cannot, however, ensure or warrant the security of any information you transmit to Culcha, and you do so at your own risk. Using unsecured Wi-Fi or other unprotected networks to submit messages through the Culcha Service is never recommended. Once we receive your transmission of information, Culcha will make commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If Culcha learns of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. Culcha may post a notice on the Culcha Site or through the Culcha Service or any other electronic means if a security breach occurs.

## Special Note to International Users

The Culcha Site and Service are hosted in South Africa and are intended for and directed to users in South Africa. If you are a user accessing the Culcha Site and Service from the USA, European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure, that differ from South African laws, please be advised that through your continued use of the Culcha Site and Service, which are governed by South African law, this Privacy Policy, and our Terms of Service, you are transferring your personal information to South Africa and you expressly consent to that transfer and consent to be governed by South African law for these purposes.

## The Website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all South African national laws and requirements for user privacy.

## Use of Cookies

This website uses cookies to better the user's experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer/device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer/device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive



in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <https://policies.google.com/privacy>. Other cookies may be stored on your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## Contact & Communication

Users contacting this website and/or its owners do so at their discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process but advise users using such form to email processes that they do so at their own risk.

This website and its owners use any information submitted to provide you with further information about the products/services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe to any email newsletter program the website operates but only if this was made clear to you and your express permission was granted when submitting any form to the email process. Or whereby you the consumer have previously purchased from or enquired about purchasing from the company a product or service that the email newsletter relates to. This is by no means an entire list of your user rights regarding receiving email marketing material. Your details are not passed on to any third parties.

## You can Opt-Out of any Email or SMS Communication

Culcha sends billing information, product information, Service updates and Service notifications to you via email or SMS. Our communication will contain clear instructions describing how you can choose to be removed from any communication list not essential to the Service. Culcha will remove you at your request.

## In the Event of a Merger, Sale, or Bankruptcy

If Culcha is acquired by or merged with a third-party entity, we reserve the right to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the (hopefully) unlikely event of our bankruptcy, insolvency, reorganisation, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

## Changes To Our Privacy Policy

Culcha may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of Culcha or the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

## How To Contact Us

If you have any questions about this Privacy Policy or the Service, please feel free to contact us at [info@culcha.co.za](mailto:info@culcha.co.za)

