

## Iris AI Privacy Policy

*Pursuant to the Protection of Personal Information Act, 4 of 2013*

Iris AI (Pty) Ltd is a South African-registered software development house. Our Company cares about how your personal information is used and is committed to respecting your privacy and helping protect your information.

This Privacy Policy will explain how Our Company uses personal data from you when you use any of our electronic platforms and facilities, including our website, social media, telephone, and/or email (“Our Company’s Electronic Facilities”), or our services, what information we collect about you, and the corresponding rights and obligations arising in connection therewith.

It is important to note that this Privacy Policy has been drafted in compliance with South Africa’s Protection of Personal Information Act, 4 of 2013 (“the POPI Act”). Our Privacy Notice demonstrating compliance with the EU General Data Protection Regulation (the GDPR) is found on our website [www.irisai.co.za](http://www.irisai.co.za).

PLEASE READ THIS DOCUMENT BEFORE YOU MAKE USE OF OUR COMPANY’S ELECTRONIC FACILITIES OR SERVICES OR PROVIDE US WITH ANY PERSONAL INFORMATION. BY PROVIDING OUR COMPANY WITH YOUR PERSONAL INFORMATION, YOU AGREE THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY, AND CONSENT TO OUR COMPANY PROCESSING YOUR PERSONAL INFORMATION, WHICH WE UNDERTAKE TO DO STRICTLY IN ACCORDANCE HEREWITH.

### **What data do we collect?**

Our company collects the following data:

- Personal identification information (name, job title, email address and/or telephone number/s)
- Information pertaining to the organisational structure of your company, where applicable

### **How do we collect your data?**

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- Complete the Contact form on our website, found at <https://irisai.co.za/contact/>.
- Submit a query or request via Our Company’s Electronic Facilities.

- Enter into an agreement with us for any of our services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.
- Request us to contact you regarding your interest in our products or services, via a third party.

### **How will we use your data?**

Our Company collects your data so that we can *inter alia*:

- Assist you with your query or request.
- Contact you in response to your request or query, which is most frequently a request for more information on our services.
- Present to you on a particular service that you have expressed a genuine interest in.
- Run a proof of concept as a means to demonstrate the effectiveness of our services, where you have requested us to do so.
- Process the agreement concluded with you and render the services required.
- Consider a job application and/or conclude an employment relationship.
- Improve the quality of our services.
- Recover unpaid sums and/or any other amount due to us.
- Proceed with debt collection.
- Identify other services which may be of interest to you and informing you of such.

When Our Company processes your contract, it reserves the right to send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent transactions.

In order to correctly handle any query or request, and to perform the abovementioned functions, Our Company may from time to time share your data with its staff, which will only be done on a need-to-know basis; and with its operators including service providers and agents who perform services on behalf of the Company which will similarly be done on a need-to-know basis, and in terms of an agreement.

Our Company does not, and will not, share your data with any third parties who have not been mentioned above, unless:

- Our Company is legally obliged to provide such information to another for legal or regulatory purposes;
- Our Company is required to do so for purposes of existing or future legal obligations;

- The onward transmission or sharing of data is necessary for the protection of Our Company's legitimate interests or that of you or a third party.

and under all of these circumstances, Our Company will take reasonable measures to ensure that such data is only provided to the recipient, if such recipient undertakes to keep the data confidential and secure.

### Conditions for Lawful Processing

Our Company would like to assure you of our commitment to processing personal information lawfully, in accordance with the POPI Act. To this end, we wish to make sure that you are aware of the conditions for lawful processing,<sup>1</sup> and have summarized them<sup>2</sup> here:

- **Accountability** – Our company must ensure that the conditions set out below, and all the measures that give effect to such conditions, are complied with at the time of the determination of the purpose and means of the processing and during the processing itself.
- **Processing Limitation** - Personal information must be processed lawfully, and in a reasonable manner that does not infringe on your privacy as data subject. Personal information may only be processed if, given the purpose for which it is processed, is adequate, relevant and not excessive. Furthermore, personal information may only be processed if the data subject consents to the processing; processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party; processing complies with an obligation imposed by law on Our Company; processing protects a legitimate interest of yours; processing is necessary for the proper performance of a public law duty by a public body; or processing is necessary for pursuing the legitimate interests of Our Company or of a third party to whom the information is supplied.<sup>3</sup> The personal information must be collected directly from you, subject to certain exceptions.<sup>4</sup>
- **Purpose Specification** – personal information must be collected for a specific, explicitly defined and lawful purposes related to a function or activity of Our Company. The records of personal information must not be retained any longer than is necessary

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<sup>1</sup> Clause 4 of the POPI Act.

<sup>2</sup> While the conditions for lawful processing are all addressed in this document, our summary is for informative purposes only. It must not be construed as legal advice or a comprehensive analysis and must not be relied on as such. Where it comes to enforcing your rights, or drafting your own Privacy Policy, independent legal advice by a POPI Act expert is strongly advised.

<sup>3</sup> For further information, refer to section 11 of the POPI Act.

<sup>4</sup> For exceptions, refer to section 12(2) of the POPI Act.

for achieving the purposes for which the information was collected or subsequently processed.<sup>5</sup>

- **Further Processing Limitation** – further processing of personal information must be compatible with the purpose for which it was collected.
- **Information Quality** – Our Company must take reasonable steps to ensure that the personal information is complete, accurate, not misleading and updated.
- **Openness** – Our Company must maintain documentation of all processing operations under its responsibility. In this regard, please refer to our Manual available on our website [www.irisai.co.za](http://www.irisai.co.za).
- **Security Safeguards** – Our Company must secure the integrity and confidentiality of personal information in our possession by taking reasonable measures to prevent loss of, damage to or unauthorised destruction of personal information, and unlawful access to or processing of personal information. To this end, please refer to the *Security of Iris AI Services* document on our website [www.irisai.co.za](http://www.irisai.co.za).
- **Data Subject Participation** – You have the right to request Our Company to confirm whether or not we hold personal information about you and request the record or description of personal information held by Our Company. You may request that we correct or delete inaccurate, excessive, misleading or unlawfully obtained information about you.

### How do we store your data?

Our Company securely stores your data at Iris AI Head Office situated at Active Park, 7 Drome Road, Formain, Johannesburg, Gauteng, South Africa, 2090.

The security measures that have been implemented by Our Company are far-reaching, and include (but are not limited to):

- Physical Security
- Server security
- Restrictions on Access
- Security by design
- Security objectives established
- Guidelines published on how to achieve these objectives
- Adoption of an overall security management strategy

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<sup>5</sup> For more information, refer to section 14 of the POPI Act.

- Policies on key security mechanisms implemented in both everyday work and server security.

The totality of Our Company's security measures is demonstrated in our *Security of Iris AI Services* document, a copy of which has been made available to you. However, if you require a further copy, please do not hesitate to request this via our website, [info@irisai.co.za](mailto:info@irisai.co.za) or +27 82 929 4940.

Our Company will keep your personal identification information, and information on the organizational structure of your company, for 180 days after the expiry of your contract with Our Company. Once this time period has expired, we will delete your data by shredding and dumping any hard copies of data and destroying the applicable hard drives.

Otherwise, where you have provided the data in any of the other circumstances listed under the abovementioned paragraph headed *How will we use your data*, the data will be deleted once our services and/or communication are no longer required. The data will be deleted in the same way as described above.

## **Marketing**

- Our Company would like to send you information about services of ours that we think you may be interested in.
- If you have agreed to receive marketing, you can always opt out at a later date.
- You have the right at any time to stop Our Company from contacting you for marketing purposes.
- If you no longer wish to be contacted for marketing purposes, let us know via the opt-out feature found in the marketing communication, or via email.

## **What are cookies?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our website, we will collect information from you automatically through cookies or similar technology.

For further information, visit <https://www.allaboutcookies.org/>.

## **How do we use cookies?**

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in on the relevant portal, service, or programme.

- Understanding how you use our website.

### **What types of cookies do we use?**

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, devices, and your IP address. Our Company reserves the right to share limited aspects of this data with third parties for advertising purposes. We reserve the right to share online data collected through cookies with our advertising partners. This means that when you visit another website, you could be shown advertising based on your browsing patterns on our website.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

### **Privacy policies of other websites**

Our company website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

### **How to contact us**

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your rights as a data subject, please do not hesitate to contact our information officer, Madie Leonard, via one of the following channels:

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

Telephone: +27 82 929 4940

Registered Post: 7 Drome Road, Formain, Lyndhurst, Gauteng, South Africa, 2090

*Marked for the attention of Madie Leonard, Information Officer*

### **Information Regulator**

To lodge a complaint pertaining to alleged violations of protection of personal information, you are free to contact the Information Regulator:

Address: 33 Hoofd Street  
Forum III, 3<sup>rd</sup> Floor Braampark  
Braamfontein, Johannesburg  
2017

Post: P.O. Box 31533  
Braamfontein, Johannesburg  
2017

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

### **Changes to our privacy policy**

Our Company reserves the right to and may from time to time update this Privacy Policy. Any revision will be published on Our Company's website.

Accordingly, you are advised to visit and re-read this policy on a regular basis.

This privacy policy was last updated in August 2020.