



## POPIA – PRIVACY POLICY

Page: 1 of 7  
Revision: 0  
Date: June 2021

### PRIVACY POLICY

This privacy statement describes how LTM Mulondo Holdings (Pty) Ltd ("LTM"), its subsidiaries and associated companies, use the information you provide when you use our products and services. It also describes the choices available to you regarding our use of your personal information and how you can contact us about our privacy practices. LTM is committed to protecting the privacy of customers of its products, services, and website. To better inform you of our policy concerning customer privacy, we have adopted the following terms, which adhere to the General Data Protection Regulation (GDPR) and Protection of Personal Information Act (POPIA) 4 of 2013.

In connection with specific products or services offered by LTM, you are provided with the relevant agreements and terms of use that supplement this policy relating to data handling.

This policy may be changed because of changes in legislation, the requirements of the authorities or to reflect changes in our practices concerning the processing of personal data. The revised policy will be posted on our website and will be effective immediately upon being posted. You can read at any time the policy currently in effect on our website: <https://www.ltmref.com/>.

LTM 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.

This version of the policy is effective as of May 2021.

### The Sources of Information

**LTM** may obtain information about you from various sources, namely:

- Products and services.
- By your signing up for a LTM products or services.
- In response to technical support or other communication to ensure the required performance of products and services.
- On our websites.
- In response to marketing or other communications.
- Through participation in an offer, program, or promotion.

If you provide us with any information or material relating to another individual, you should make sure that this sharing with us and our further use as described to you from time to time are in line with applicable laws; thus, for example, you should duly inform that individual about the processing of her/his personal data and obtain her/his consent, as may be necessary under applicable laws.

You may also choose to consent to third parties disclosing information about you to us that those third parties have received.

### Information Provided by Customers and How We Use Information

Personal data processing by LTM is always carried out in a legal and fair manner.

**You will always know what kind of information you provide to LTM before you start to use the products and services. The data which you provide depends on the services and products you use.**

The data obtained for processing depends on the product or service, and it is recommended that customers carefully read the agreements related thereto.

Regardless of the type of data and territory where data was received or processed, we use the highest standards of data protection and apply various legal, organizational, and technical measures to protect customer data, guarantee safety and confidentiality, as well as ensure customers' rights guaranteed under the applicable laws.

Revised by: Linda Daneel

Signature:

Approved by: Hardus Visagie

Signature:



## POPIA – PRIVACY POLICY

Page: 2 of 7  
Revision: 0  
Date: June 2021

### Types of Information and Collection Methods

#### Information Submitted by You

You may be asked to provide Personal Information anytime you are in contact with LTM. LTM may collect Personal Information about you (and through third parties or other sources were permitted by law) when you interact with us, such as creating or registering for an account, using our products and services, requesting information, requesting notifications for products and services updates, or when you otherwise actively send us data and Personal Information. In each such instance, you will know what data we collected because you voluntarily submitted it. You are not required to provide any Personal Information that we have requested, but if you chose not to do so, you may not be able to make use of our products and services offered or we will not be able to respond to any inquiries you may have or process your orders.

If you choose to provide LTM with a third party's personal information (such as name, email, and phone number), you represent and warrant that you have the third party's permission to do so.

#### Information Collected Through Third-Party Sources

We may also collect information about you through our trusted third-party sources to assist us in providing product and service offerings to you.

#### Information Automatically Collected

Like many other websites, LTM uses automatic data collection tools, such as cookies, embedded web links, web beacons, gifs and other similar technologies. These tools automatically collect certain standard information that your browser sends to our Website when you visit our Website or use our Services, such as your domain name, your browser type, operating system, web pages you view, links you click, your IP address, the length of time you visit our Website or use our Services, the referring URL or the webpage that led you to our Website.

#### Combination

LTM and the third parties we engaged to provide services on our behalf may combine the information we collect from you over time that you actively submit, to the extent permitted by applicable law.


### How We May Use Your Information

We may use your information for purposes of operating our business and other legitimate purposes permitted by applicable law. We may use your personal information in the following ways:


- To communicate with you about our products or services, respond to your inquiries, fulfill, and process your request for our products and services, including helping you to complete transactions, process payments, and other customer service purposes.
- To enable you to use certain features of our product and services
- To better understand how visitors use our website and products and services, both on an aggregated and individualized basis, to improve our website and products and services and for other research and analytical purposes.
- To send communications to you, either from LTM directly or from our partners, including for marketing, newsletters, promotions, customer satisfaction surveys purposes and other communications related to our business, including information about our solutions we think may interest you. You can edit your communication preferences for receiving marketing emails as further explained below.

### How We Share Your Information

Revised by: Linda Daneel

Signature: 

Approved by: Hardus Visagie

Signature: 



## POPIA – PRIVACY POLICY

Page: 3 of 7  
Revision: 0  
Date: June 2021

We are not in the business of selling or sharing your Personal Information with third parties for marketing purposes unless you have granted us permission to do so. We may share and use your Personal Information as described below:

- With our affiliates and subsidiaries worldwide.
- With third-party vendors, service providers, contractors or agents as required to perform specific purposes on our behalf.
- To geographically or sectorally relevant resellers and/ or distributors, particularly if you or your company have purchased through a third party before. These companies and persons often provide service to LTM's customers. They have access to customer information to perform their jobs, which is not limited to marketing LTM products, but may not use it for other purposes.
- To comply with the law, a judicial proceeding, court order or a subpoena other legal processes, such as requests from public and governmental authorities or law enforcement, or to exercise our legal rights or defend against legal claims.
- Where we believe it is necessary to investigate, prevent, or act regarding illegal activities, suspected fraud, brand protection, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as otherwise required by law.
- In connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business.

If you do not wish us to share your information as described, you may choose not to supply any Personal Information to us by not placing orders for our products and services.

We reserve the right to fully use and share information on an aggregated basis, which is not personally identifiable about the customer, with third parties for marketing, advertising, research, or similar purposes.

### **LTM WILL ONLY PROCESS PERSONAL DATA FOR PARTICULAR, PRE-DETERMINED PURPOSES THAT ARE LEGITIMATE WITH REGARD TO APPLICABLE LAW, AND THAT ARE RELEVANT TO LTM'S BUSINESS.**

- To ensure the performance of a contract with customers and to ensure the required performance of products and services for customers.
- To protect the customer from known threats to information security.
- To improve customer interaction and experience with our products and services
- To provide technical support of products and services for customers and to improve the quality of products and services.
- To conduct statistical and other studies based on anonymous data.

### **Legal Bases for Data Processing**

The legal basis we use depends on the purpose of processing personal data, which may be the following:

- **Contract** –in cases where we must process certain data necessary to perform in terms of a contract.
- **Consent** –in cases where a customer chooses to send us data
- **Legal obligation** –in cases where we must process data to meet legal requirements, such as for tax purposes.
- **Legitimate interest** –in cases where we have legitimate interests as a cybersecurity company, except where such interests are overridden by the interests or fundamental rights and freedoms of the customer. In such cases, for example, where personal data is stored in our infrastructure and analyzed for recent and potential cyberthreats by using artificial intelligence and/or relying on the expertise of our specialists.

Recital 49 of the GDPR acknowledges that it is a legitimate interest of a company to process personal data to the extent necessary and proportionate to ensure network and information security.

### **LIMITATION OR RESTRICTION DATA PROCESSING**

Revised by: Linda Daneel

Signature:

Approved by: Hardus Visagie

Signature:



## POPIA – PRIVACY POLICY

Page: 4 of 7  
Revision: 0  
Date: June 2021

IF YOU CHOOSE NOT TO PROVIDE DATA THAT IS NECESSARY IN ORDER FOR US TO PROVIDE A SPECIFIC PRODUCT OR SERVICE, YOU MAY NOT BE ABLE TO USE OUR PRODUCTS OR SERVICES.

### What we are not going to process

Through its products and services, LTM never process "sensitive" personal data such as religion, political views, sexual preference, or health, or other special categories of personal data. We do not wish to receive any such data and will not request it from you.

### Where we process Information

The personal data provided by customers to LTM will be processed in the Republic of South Africa:

### Your Rights and Options

You have certain rights regarding your personal data. We also offer you certain options about what personal data you provide to us, how we use that information, and how we communicate with you.

In most cases you can choose not to provide personal data to us when you use LTM's products, services, and websites. You may also refrain from submitting information directly to us. However, if you do not provide personal data when requested, you may not be able to benefit from the full range of LTM's products and services and we may not be able to provide you with information about products, services, and promotions.

You can at any time choose not to receive marketing communications by e-mail, if you have previously subscribed to receive them, by clicking on the unsubscribe link within the marketing e-mails you receive from us.

If your employer provides your personal data to LTM, you may have certain options with respect to LTM's use or disclosure of the information. Please contact your employer to learn about and to exercise your options.

To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your personal data. We will apply your preferences going forward. In some circumstances, withdrawing your consent to LTM's use or disclosure of your personal data will mean that you cannot take advantage of certain of LTM's products or services.

Subject to applicable law, you may have the following rights:

- To obtain confirmation that we hold personal data about you.
- To request access to and receive information about your personal data.
- To receive copies of your personal data that you provided to us, also in a machine-readable format and have it sent to another data controller, where technically possible.
- To update and correct inaccuracies in your personal data.
- To object to the processing of your personal data.
- To have the information blocked, anonymized, or deleted, as appropriate.
- To lodge a complaint with a supervisory authority.

The right to access personal data may be limited in some circumstances by the requirements of local law or technological measures, including where the data has been anonymized and therefore does not relate to an identified or identifiable natural person. If you wish to exercise these rights, you may at any time directly contact us at [linda@ltmtech.co.za](mailto:linda@ltmtech.co.za).

Revised by: Linda Daneel

Signature:

Approved by: Hardus Visagie

Signature:



If you wish to object to data processing or withdraw your consent in cases where you use our products, you must stop using the product. If you wish to exercise your right to remove the already sent data, please contact us directly to request deletion via [linda@ltmtech.co.za](mailto:linda@ltmtech.co.za).

If we fall short of your expectations in processing your personal data or you wish to make a complaint about our privacy practices, please relate this to us, as it gives us an opportunity to fix the problem. You may contact us by using the contact details provided in the "How to Contact Us" section below. To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

### The Privacy Principles

Personal data processing at LTM is based on the following principles:

#### *Consent and choice*

- Presenting to the customers the choice whether to send their personal data except where the customers cannot freely withhold consent or where applicable law specifically allows the processing of personal data without the natural person's consent. The customer's election must be freely given, specific and made on a knowledgeable basis.
- Informing customers, before obtaining consent, about their rights under the individual participation and access principle.
- Providing customers, before obtaining consent, with the information indicated by the openness, transparency, and notice principle.
- Explaining to customers the implications of granting or withholding consent.

#### *Purpose legitimacy and specification*

- Ensuring that the purpose(s) complies with applicable law and relies on a permissible legal basis.
- Communicating the purpose(s) to customers before the information is used for the first time for a new purpose.
- Using language for this specification which is both clear and appropriately adapted to the circumstances.


#### *Data processing limitation*

- Gathering of personal data to that which is within the bounds of applicable law and strictly necessary for the specified purpose(s).
- Deleting and disposing or anonymizing of personal data whenever the purpose for personal data processing has expired, there are no legal requirements to keep the personal data, or whenever it is practical to do so.

#### *Use, retention, and disclosure limitation*

- Limiting the use, retention, and disclosure of personal data to that which is necessary to fulfil specific, explicit, and legitimate purposes.
- Limiting the use of personal data to the purposes specified by LTM prior to receiving the data unless a different purpose is explicitly required by applicable law.
- Retaining personal data only if necessary to fulfill the stated purposes and thereafter securely destroying or anonymizing it.
- Retaining personal data for as long as necessary to fulfill legal obligations, comply with laws, resolve disputes, including in cases of litigation, proceedings, or investigations.
- Retaining personal data for as long as necessary to fulfill legitimate interests.
- Locking (i.e., archiving, securing, and exempting the personal data from further processing) any personal data when and for as long as the stated purposes have expired, but where retention is required to comply with applicable laws.

Revised by: Linda Daneel

Signature: 

Approved by: Hardus Visagie

Signature: 



## POPIA – PRIVACY POLICY

Page: 6 of 7  
Revision: 0  
Date: June 2021

### *Accuracy and quality*

- Ensuring that the personal data processed is accurate, complete, up to date (unless there is a legitimate basis for keeping outdated data), adequate and relevant for the purpose of use.
- Ensuring the reliability of personal data provided from a source other than from customers before it is processed.
- Verifying, through appropriate means, the validity and correctness of the claims made by the customer prior to making any changes to the personal data (to ensure that the changes are properly authorized), where it is appropriate to do so.
- Establishing personal data processing procedures to help ensure accuracy and quality.
- Establishing control mechanisms to periodically check the accuracy and quality of personal data processing.

### *Openness, transparency, and notice*

- Providing customers with clear and easily accessible information about LTM's policies.
- Establishing procedures and practices with respect to the processing of personal data.
- Including in notices the fact that personal data is being processed, the purpose for which this is done, the types of privacy stakeholders to whom the personal data might be disclosed, and the identity of the entity which determines the above and on how to contact.
- Disclosing the options and means offered by LTM to customers for the purposes of limiting the processing of, and for accessing, correcting, and removing their information.
- Giving notice to customers when major changes in the personal data handling procedures occur.

### *Individual participation and access*

- Giving customers the ability to contact us (by using the contact details provided in the "How to Contact Us") and review their personal data, provided their identity is first authenticated with an appropriate level of assurance and such access is not prohibited by applicable law.
- Allowing customers to challenge the accuracy and completeness of the personal data and have it amended, corrected or removed as appropriate and possible in the specific context.
- Providing any amendment, correction, or removal to personal data processors and third parties to whom personal data had been disclosed, where they are known.
- Establishing procedures to enable customers to exercise these rights in a simple, fast, and efficient way, which does not entail undue delay or cost.

### **Information Security: How We Protect Your Privacy**

All data and all information provided by you is confidential by default. LTM will therefore always apply technical and organizational data security measures for the protection of personal data that are adequate and appropriate, considering the concrete risks resulting from the processing of personal data as well as up-to-date security standards and procedures.

LTM also maintains physical, electronic, and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

### **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 applicable laws. 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

Revised by: Linda Daneel

Signature: 

Approved by: Hardus Visagie

Signature: 





## POPIA – PRIVACY POLICY

Page: 7 of 7  
Revision: 0  
Date: June 2021

supervisory authority, 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](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

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

### Communicating with You

By using our products, services or website or otherwise providing Personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use. For example, if we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Website, by sending an email, or otherwise contacting you.

### Law and Jurisdiction

By visiting the Website, or using any of our products or services, you agree that your Personal Information will be handled as described in this Policy. Your use of our Website or Products or Services and any dispute over privacy, are subject to this Policy and our Website Terms of Use, including its applicable limitations on damages and the resolution of disputes.

### How to Contact Us

If you have any questions or comments about this Privacy Policy, LTM's privacy practices or if you would like us to update or remove information or preferences you provided to us, please contact LTM via e-mail or phone: [linda@ltmtech.co.za](mailto:linda@ltmtech.co.za) or +27 (16) 450 4260

Revised by: Linda Daneel

Signature:

Approved by: Hardus Visagie

Signature: