



PRIVACY NOTICE

1 WHO WE ARE

Headspace Technologies Proprietary Limited [2015/192030/07].
57 Main Rd,
Paarl,
Western Cape
7646,
South Africa

2 WHAT WE NEED

- 2.1 Our Data Protection Policy governs the use and storage of your Personal Information. You can request a copy of our Data Protection Policy from our Information Officer.
- 2.2 Headspace Technologies is a Responsible Party (as defined in the Protection of Personal Information Act No. 4 of 2013) of the Personal Information you (the Data Subject) provide to us about yourself.
- 2.3 In addition, Headspace Technologies is an Operator (as defined in the Protection of Personal Information Act No. 4 of 2013) of the Personal Information you (the Responsible Party) provide to us of your customers (customers of financial services products you receive revenue for), partners (parties who will receive compensation for revenue managed through our service), and employees (interactive users of our service).
- 2.4 The purposes, types of information, legal grounds and retention period of personal information we collect from you are:

Provide service to you, our customer

What we collect	Your name, address, contact details, ID numbers and bank account details.
Legal grounding	We have a legal obligation from governmental authorities to identify our customers (Anti-Money-Laundering and Know Your Customer)
Retention period	The data provided will be stored no longer than is strictly necessary, albeit with regard to existing legal requirements for storing personal data, being at least (5) five years following the termination of the relationship.

Provide revenue management service

What we collect	Name, initials and ID numbers of your customers – to be able to match revenue you receive from financial providers to your customers. Name, email address and VAT registration details of your partners (people in your business for whom we manage revenue) – to be able to allocate revenue you receive from financial providers to your partners.
Legal grounding	Required as an essential element of the revenue management service we provide.
Retention period	The data provided will be stored no longer than is strictly necessary, albeit with regard to existing legal requirements for storing personal data, being at least (5) five years following the termination of the relationship.

Respond to customer service requests to allow us to support users of our software and send periodic communications regarding the service.

What we collect	Name, telephone number, email address and IP address of individual users of our software
Legal grounding	Necessary for the purposes of our legitimate interests.
Retention period	The data provided will be stored for at least the complete duration that any user has an account on the service, but no longer than is strictly necessary to respond to queries on previous customer service requests for your agreement with us.

3 WHAT WE DO WITH IT

- 3.1 We use your Personal Information in order to provide you with the above listed services.
- 3.2 We may disclose your Personal Information to our third-party service providers, where necessary. However, should we make such a disclosure we require that our service providers take appropriate, reasonable, technical and organisational measures to keep your Personal Information secure. In addition, our service providers may not use or disclose Personal Information for any purpose other than providing the services on our behalf.
- 3.3 We may also disclose your Personal Information:

- 3.3.1 when such disclosure is necessary to protect the legitimate interests (safety, property or other rights) of the Company, our directors, employees, consultants, or any other person, or where required or permitted by law; or
- 3.3.2 if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation.
- 3.3.3 There is a possibility that the Personal Information that we collect from you may have to be transferred to, and stored at, a destination outside of the Republic of South Africa or the EU (for example, by a third-party data hosting service provider). If your information is transferred outside of South Africa, we will take reasonable organisational and/or contractual measures to ensure that your Personal Information is processed by such third party service providers for the purposes for which it has been provided to us and that the required levels of protection have been implemented by such third party service providers to safeguard your Personal Information.

4 HOW LONG WE KEEP IT

Under South African law, we are required to keep your documents for 5 years after termination of our service according to our Data Retention Policy. After this period, your Personal Information will be irreversibly destroyed. Any Personal Information held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information. Please see <https://legal.commspace.co.za/#drp> for more information on our Personal Information retention schedule or this information may be requested from our Information Officer.

ONBOARDING	- Name	We have a legal obligation from governmental authorities to identify our customers (Anti-Money-Laundering and Know Your Customer)	The data provided will be stored no longer than is strictly necessary, albeit with regard to existing legal requirements for storing personal data, being at least (5) five years following the termination of the relationship.
	- Address		
	- E-mail address		
	- ID Numbers		
SELF-SERVICE	- Name	We have a legal obligation from governmental authorities to identify our customers (Anti-Money-Laundering and Know Your Customer)	The data provided will be stored no longer than is strictly necessary, albeit with regard to existing legal requirements for storing personal data, being at least (5) five years following the termination of the relationship.
	- Address		
	- E-mail address		
MANAGED SERVICES	- Bank account details	We have a legal obligation from governmental authorities to identify our customers (Anti-Money-Laundering and Know Your Customer)	The data provided will be stored no longer than is strictly necessary, albeit with regard to existing legal requirements for storing personal data, being at least (5) five years following the termination of the relationship.
	- Name		
	- Address		
	- E-mail address		

	- ID number		
TO RESPOND TO YOUR CUSTOMER SERVICE REQUESTS AND TO ALLOW US TO BETTER SERVICE YOU IN RESPONDING TO YOUR CUSTOMER SERVICE.	- Name	Necessary for the purposes of our legitimate interests	As long as necessary for the purpose.
	- E-mail address		
	- Telephone number		
	- IP-address		
TO SEND PERIODIC EMAILS REGARDING YOUR ORDER OR OTHER PRODUCTS AND SERVICES.	- Name	Consent.	Until you unsubscribe from receiving such emails.
	- E-mail address		

5 WHAT ARE YOUR RIGHTS

Should you believe that any Personal Information we hold on you is incorrect or incomplete, you can request to see this information, rectify it or have it deleted. Please contact our Information

Officer at iso@headspacetech.com to request a copy of our Data Subject Access Request Form.

In the event that you wish to complain about how we have handled your Personal Information, please contact our Information Officer at iso@headspacetech.com or in writing at KVV Head Office, 57 Main Road, Paarl, 7646. Our Information Officer will then look into your complaint and work with you to resolve the matter.

If you still feel that your Personal Information has not been handled appropriately according to the law, you can contact the Information Regulator at infoereg@justice.gov.za and file a complaint with them.