



## PRIVACY POLICY

### 1. INTRODUCTION

- 1.1. Construction Computer Software (Pty) Ltd (CCS) is committed to safeguard the privacy of the users of the Website. CCS's Privacy Policy ("Policy"), which forms part of the Website Terms and Conditions, explains the data processing practices of CCS in so far as it relates to, but not limited to, all of the CCS Website properties. (the "Website").
- 1.2. By using the Website, you are consenting to this Policy and the collection, use and disclosure of your personal information by CCS as outlined in this Policy. If this Policy is not acceptable to you, please do not submit any of your personal information and/or use the Website.
- 1.3. If you have any request concerning your personal information, or should you wish to make any amendment to your personal information or have any queries with regard to the Policy or any of the above please contact us by sending an email to [marketing@ccssa.com](mailto:marketing@ccssa.com).
- 1.4. If we make any changes to this Policy, we will post them on this page and as such it is your responsibility to periodically review this Policy in order to stay up to date on any modifications and/or amendments made by CCS.

### 2. INFORMATION ABOUT THE COLLECTION OF PERSONAL DATA AND CONTACT DETAILS OF THE PERSON RESPONSIBLE

- 2.1. We are pleased that you are visiting our Website and thank you for your interest. Below we inform you about the handling of your personal data when using our Website. Personal data is all data with which you can be personally identified.
- 2.2. Responsible for the data processing on this Website within the meaning of the General Data Protection Regulation (GDPR) is Construction Computer Software (Pty) Ltd, Southdowns Office Park – A, 21 Karee Street, Irene ext. 54, Centurion, South Africa | T: +27 12 684 6000 | [info@ccssa.com](mailto:info@ccssa.com). The person responsible for the processing of personal data is the natural or legal person who alone or together with others decides on the purposes and means of processing personal data.
- 2.3. The person responsible and who has been appointed as an external data protection officer for this Website, can be reached as follows: Ms. Joanna Pollard, [joanna.p@ccsgulf.com](mailto:joanna.p@ccsgulf.com).
- 2.4. For security reasons and to protect the transmission of personal data and other confidential content (e.g. orders or inquiries to the person responsible), this Website uses an SSL or TLS encryption. You can recognise an encrypted connection by the string "https://" and the lock symbol in your browser line.

### 3. PERSONAL INFORMATION COLLECTED

- 3.1. CCS may collect and store a variety of personal information about you when you either directly submit such information to CCS either electronically or otherwise, or through the use of the Website, CCS products and/or services. The personal information that we may collect, process and store includes but is not limited to:
  - 3.1.1. Name and surname;
  - 3.1.2. Phone numbers;
  - 3.1.3. Email address;
  - 3.1.4. Company name;
  - 3.1.5. Physical address;
  - 3.1.6. Which products you have bought and details around the usages of CCS products and/or services.
  - 3.1.7. Any documentation relating to you or your company.
  - 3.1.8. By using this Website you consent to your personal information being shared with 3<sup>rd</sup> party service providers and you authorise CCS to accept on your behalf the terms and conditions set by such 3<sup>rd</sup> parties to enable them to provide the services in accordance with their agreements with CCS.
  - 3.1.9. CCS and its designated 3<sup>rd</sup> party service providers may from time to time amend their terms and conditions without prior notice and it is incumbent on you to familiarise yourself with such amendments on a regular basis.
- 3.2. When using our Website for information purposes only, i.e. if you do not register or otherwise provide us with your personal information, we only collect data that your browser transmits to our server (so-called "server log files"). When you visit our Website, we collect the following data, which is technically necessary for us to display the Website to you: website visited, date and time at the time of access; source/reference from which you came to the page; browser used; operating system used and the IP address used (if necessary: in anonymous form) and other similar information.

#### 4. **USE AND DISCLOSURE OF PERSONAL INFORMATION**

- 4.1. We may process your personal information collected for purposes of:
  - 4.1.1. Registering or providing products and/or services to you as described on the Website;
  - 4.1.2. Processing or facilitating the payment of any products and/or services that CCS may provide to you through the Website or otherwise;
  - 4.1.3. Confirming your use or continued use of CCS products and/or services under any existing contracts/agreements that CCS may have with you;
  - 4.1.4. Research and development purposes;
  - 4.1.5. Communications and marketing purposes;
  - 4.1.6. Protecting the CCS business, its customers and its products and/or services;
  - 4.1.7. Administering, improving and/or personalising customer service and/or our Website;
  - 4.1.8. Sending periodic emails and/or providing you with information about new developments on or any changes to the products and/or services made available via this Website;
- 4.2. We may also use personal information in aggregate form (so that no individual user is identified) to:
  - 4.2.1. Build up market profiles;
  - 4.2.2. Aid strategic development;
  - 4.2.3. Manage our relationship with advertisers;
  - 4.2.4. Audit usage of the Website.
- 4.3. All processing of your personal information will be in accordance with all applicable law in South Africa relating to data protection, privacy such as the Protection of Personal Information Act, 2013 (Act No. 4 of 2013). If you are established in the European Economic Area (EEA) or you are subject to the requirements of the EU General Data Protection regulations and directives namely European Directives 95/46/EC and 2002/58/EC, then our processing of any personal information will be in accordance with those applicable directives.

#### 5. **SHARING YOUR PERSONAL INFORMATION**

- 5.1. We may disclose your personal information to:
  - 5.1.1. Companies within the CCS group of companies or its holding company including its holding company's subsidiaries and/or affiliates;
  - 5.1.2. If we are reorganised or sold to another entity, we may transfer any personal information we hold about you to that entity;
  - 5.1.3. selected 3<sup>rd</sup> party providers, partners or integrators who assist us in providing services to you either in respect of the Website or in providing products and services to you, such as website hosting, maintenance, back-up, storage, payment processing, billing and any other applicable 3<sup>rd</sup> party back end system providers;
  - 5.1.4. Staff members, technical consultants and other 3<sup>rd</sup> parties that may manage the Website or make the Website available or who you may liaise or have contact with in respect of your use or continued use of such products and/or services.
- 5.2. Such 3<sup>rd</sup> Parties would only be permitted to use your personal information for the purposes of facilitating and/or providing those products and/or services for and on behalf of CCS.
- 5.3. Except for the 3<sup>rd</sup> Parties described above we will not sell or share your personal information with any other 3<sup>rd</sup> Parties without your consent.
- 5.4. Notwithstanding the aforesaid, CCS will be entitled to disclose personal information where we are compelled by law or a court order to do so, or if we believe that such action is necessary for the purpose of the legitimate interest pursued by CCS, to protect and defend the rights, property or safety of CCS, the Website, visitors to the Website or others.
- 5.5. If you are visiting this Website from a country other than South Africa the various communications will necessarily result in the transfer of information across international boundaries.

#### 6. **SECURITY**

- 6.1. CCS adopts reasonable data collection, storage and processing practices and security measures to protect against the loss, misuse and interception by 3<sup>rd</sup> Parties of the personal information under its control. However, due to the inherent nature of the internet, we cannot guarantee that communications between you and CCS or personal information stored on the Website or any of our servers, will be completely free from unauthorised access by 3<sup>rd</sup> Parties and your use of the Website demonstrates your assumption of this inherent risk.

6.2. To the extent permitted by law, CCS assumes no liability for any loss or damages suffered or incurred by you or any 3<sup>rd</sup> Party as a result of the interception, loss, alteration or misuse of personal information transmitted over the internet.

## 7. **LAW ENFORCEMENT AUTHORITIES**

CCS may, in its sole discretion, contact law enforcement authorities if it believes that anything unlawful is occurring in connection with the Website. In this process, we may provide the law enforcement authorities with any personal information that is held by CCS.

## 8. **USE OF COOKIES**

8.1. Cookies may be placed on your computer when you visit and/or register on the Website. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser. In order to make visiting our Website attractive and to enable the use of certain functions, we use so-called cookies on various pages. These are small text files that are stored on your device. Some of the cookies we use are deleted after the end of the browser session, i.e. after you close your browser (so-called session cookies). Other cookies remain on your device and allow us or our partner companies (third-party cookies) to recognise your browser the next time you visit (persistent cookies). If cookies are set, they collect and process certain user information such as browser and location data as well as IP address values to the individual extent. Persistent cookies are automatically deleted after a specified period.

8.2. CCS may use cookies to identify you when you access the Website and to build up a demographic profile. The use of cookies also allows registered users to be presented with a personalised version of the Website. If personal data is also processed by individual cookies implemented by us, the processing is carried out in accordance with Art. 6 Para. 1 lit. f GDPR to protect our legitimate interests in the best possible functionality of the Website and a customer-friendly and effective design of the page visit.

8.3. By using the Website, you agree that CCS may use cookies. Please note that you can set your browser so that you are informed about the setting of cookies and decide individually whether to accept them or to exclude the acceptance of cookies for certain cases or in general. Each browser differs in the way it manages the cookie settings. This is described in the help menu of each browser, which explains how you can change your cookie settings. You can find these for the respective browsers under the following links:

Internet Explorer: <https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies>

Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop>

Chrome: <https://support.google.com/chrome/answer/95647>

Opera: [help.opera.com/Windows/10.20/de/cookies.html](https://help.opera.com/Windows/10.20/de/cookies.html)

Please note that the functionality of our Website may be restricted if cookies are not accepted.

## 9. **CONTACT US**

Personal data is collected when you contact us (e.g. via the contact form or email). Which data is collected in the case of a contact form, can be seen from the respective contact form fields. This data is stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in answering your request in accordance with Art. 6 Para. 1 lit. f GDPR. If your contact is aimed at the conclusion of a contract, then an additional legal basis for the processing is Art. 6 Para. 1 lit. b GDPR.

## 10. **USE OF YOUR DATA FOR DIRECT ADVERTISING**

If you have provided us with your e-mail address when purchasing goods or services, we reserve the right to regularly send you offers from our range of goods or services similar to those already purchased from our range. We do not have to obtain any separate consent from you for this in accordance with Section 7 (3) UWG. In this respect, data processing takes place solely on the basis of our legitimate interest in personalised direct advertising in accordance with Art. 6 Para. 1 lit. f GDPR. If you have initially objected to the use of your email address for this purpose, we will not send you an email. You are entitled to object to the use of your email address for the aforementioned advertising purpose at any time with future effect by notifying the person responsible at the beginning. After receipt of your objection, the use of your email address for advertising purposes will be stopped immediately.

#### 11. DATA PROCESSING FOR ORDER PROCESSING

To process your order, we work with service providers who support us in whole or in part in the execution of contracts. Certain personal data is transmitted to these service providers in accordance with the following information. The personal data we collect is used during contract processing. We pass on your payment data to the commissioned credit institution as part of the payment processing, if this is necessary for the payment processing. If payment service providers are used, we will inform you explicitly.

#### 12. 3<sup>rd</sup> PARTY WEBSITES

The Website may contain links to websites maintained by 3<sup>rd</sup> Parties. CCS is not responsible for the privacy practices of such 3<sup>rd</sup> Party websites and CCS does not control the content or the links that may appear on those websites. CCS recommends that you refer to the 3<sup>rd</sup> Party's website terms and conditions and Privacy Policy prior to using the relevant 3<sup>rd</sup> party website before providing personal information. CCS does not endorse nor approve any 3<sup>rd</sup> party website nor the content of any of these websites made available via our services.

#### 13. USE OF SOCIAL MEDIA: VIDEOS

- 13.1. This Website uses the YouTube embedding function to display and play back videos from the provider "YouTube", which belongs to Google LLC., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). The extended data protection mode is used here, which, according to the provider, only starts storing user information when the video(s) is played. If the playback of embedded YouTube videos is started, the provider "YouTube" uses cookies to collect information about user behaviour. According to "YouTube", these are used, among other things, to record video statistics, improve user-friendliness and prevent abusive behavior. If you are logged in to Google, your data will be assigned directly to your account when you click on a video. If you do not want your YouTube profile to be assigned, you must log out before activating the button. Google stores your data (even for users who are not logged in) as usage profiles and evaluates them. Such an evaluation takes place in particular in accordance with Art. 6 Para. 1 lit.f GDPR on the basis of Google's legitimate interests in the display of personalized advertising, market research and / or the design of its website according to requirements. You have a right to object to the creation of these user profiles, and you must contact YouTube to exercise them.
- 13.2. Regardless of whether the embedded videos are played back, a connection to the Google "DoubleClick" network is established each time this Website is accessed, which may trigger further data processing operations without our influence. Google LLC, based in the USA, is certified for the US-European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU. Further information on data protection at "YouTube" can be found in the provider's data protection [declaration](http://www.google.de/intl/de/policies/privacy) at: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy)

#### 14. ONLINE MARKETING

- 14.1. This Website uses the online advertising program "Google Ads" and, as part of Google AdWords, the conversion tracking of Google LLC., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google").
- 14.2. We use the offer of Google Ads to draw attention to our attractive offers on external websites with the help of advertising materials (so-called Google Ads). In relation to the data from the advertising campaigns, we can determine how successful the individual advertising measures are. We are therefore interested in showing you advertising that is of interest to you, to make our Website more interesting for you and to achieve a fair calculation of advertising costs.
- 14.3. The cookie for conversion tracking is set when a user clicks on a Google Ads ad placed by Google. Cookies are small text files that are stored on your computer system. These cookies usually lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of this Website and the cookie has not yet expired, Google and we can recognize that the user clicked on the ad and was redirected to this page. Every Google Ads customer receives a different cookie. Cookies cannot therefore be tracked via the websites of Google Ads customers. The information obtained using the conversion cookie is used to create conversion statistics for Google Ads customers who have opted for conversion tracking. Customers find out the total number of users, who clicked on their ad and were redirected to a page with a conversion tracking tag. However, we will not receive any information that can be used to personally identify users. If you do not want to participate in tracking, you can block this use by deactivating the Google Conversion Tracking cookie via your internet browser under user settings. You will then not be included in the conversion tracking statistics.
- 14.4. We use Google Ads based on our legitimate interest in targeted advertising in accordance with Art. 6 para. 1 lit. f GDPR. Google LLC, based in the USA, is certified for the US-European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU. [www.google.de/policies/privacy/](http://www.google.de/policies/privacy/)

- 14.5. You can permanently deactivate cookies for advertising specifications by preventing them by setting your browser software accordingly or by downloading and installing the browser plug-in available under the following link: [www.google.com/settings/ads/plugin](http://www.google.com/settings/ads/plugin)

## 15. WEB ANALYTICS SERVICES

- 15.1. This Website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer and that enable an analysis of your use of the Website.
- 15.2. On our behalf, Google will use this information to evaluate your use of the Website, to compile reports on Website activity and to provide us with other services related to Website activity and internet usage. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.
- 15.3. You can prevent the storage of cookies by setting your browser software accordingly, however we would like to point out that in this case you may not be able to use all functions of this Website to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the Website (including your IP address) and from processing this data by Google by downloading the browser plug-in available under the following link and install: <http://tools.google.com/dlpage/gaoptout>
- 15.4. Google LLC, based in the USA, is certified for the US-European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU. You can find more information on the handling of user data at Google Analytics in Google's data protection declaration: <https://support.google.com/analytics/answer/6004245>

## 16. TOOLS AND OTHER

- 16.1. On our Website we use Google Maps (API) from Google LLC., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Google Maps is a web service for displaying interactive (land) maps to visually display geographic information. By using this service, our location will be shown to you and any travel will be easier.
- 16.2. As soon as you call up the sub-pages in which the Google Maps map is integrated, information about your use of our Website (such as your IP address) is transmitted to Google servers in the USA and stored there. This takes place regardless of whether Google provides a user account that you are logged in to or whether there is no user account. If you are logged in to Google, your data will be assigned directly to your account. If you do not want your profile to be assigned to Google, you must log out before activating the button.
- 16.3. Google stores your data (even for users who are not logged in) as usage profiles and evaluates them. Such an evaluation is carried out in particular in accordance with Art. 6 Para. 1 lit. f GDPR on the basis of Google's legitimate interests in the display of personalized advertising, market research and / or the needs-based design of its Website. You have a right to object to the creation of these user profiles, and you must contact Google to exercise them.
- 16.4. You have a right to object to the creation of these user profiles, and you must contact Google to exercise them. Google LLC, based in the USA, is certified for the US-European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU. If you do not agree to the future transmission of your data to Google when using Google Maps, there is also the option of completely deactivating the Google Maps web service by switching off the JavaScript application in your browser. Google Maps and thus the map display on this Website cannot then be used. You can view Google's terms of use at [www.google.de/intl/de/policies/terms/regional.html](http://www.google.de/intl/de/policies/terms/regional.html), the additional terms of use for Google Maps can be found at [https://www.google.com/intl/de\\_US/help/terms\\_maps.html](https://www.google.com/intl/de_US/help/terms_maps.html). You can find detailed information on data protection in connection with the use of Google Maps on the Google website ("Google Privacy Policy"): <https://policies.google.com/privacy>.

## 17. RIGHTS OF THE DATA SUBJECT

- 17.1. The applicable data protection law grants you comprehensive data protection rights (information and intervention rights) regarding the processing of your personal data.  
The GDPR provides the following rights for individuals:
- 17.1.1. The right to be informed
  - 17.1.2. The right of access
  - 17.1.3. The right to rectification
  - 17.1.4. The right to erasure
  - 17.1.5. The right to restrict processing
  - 17.1.6. The right to data portability
  - 17.1.7. The right to object

17.1.8. Rights in relation to automated decision making and profiling.

17.2. For a detailed explanation of what these rights entail follow this link: <https://ico.org.uk/your-data-matters/>

18. **DURATION OF STORAGE OF PERSONAL DATA**

The duration of the storage of personal data is based on the respective legal retention period (e.g. retention periods under commercial and tax law). After the deadline has expired, the corresponding data will be routinely deleted if it is no longer required to fulfill the contract or initiate a contract and / or if we do not have a legitimate interest in further storage.