



Privacy Policy

Introduction

ITR respects your privacy and is committed to protecting your personal data. Read on for more information regarding how we look after your personal data when you visit our website (regardless of your location), your privacy rights and how the law protects you.

The content is structured into the following sections:

- Overview
- Your data
- How we collect your data
- How we use your data
- Disclosures of your data
- Data security
- Your legal rights

Overview

The policy details how ITR collects and processes your personal data when you use this website to purchase products and/or services. This website is not intended for children and we do not knowingly collect data relating to children.

Please read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Contact Details

If you have any questions about this Privacy Policy or our privacy practices, please contact us:

ITR

264/1 Uys Street

Rynfield

Benoni

South Africa

Email address: info@itrefurb.co.za

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We regularly update our Privacy Policy. It was last updated on 20 August 2023. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

Your Data

Personal data is any information which allows a person to be identified. It does not include anonymous data (where the person's identity has been removed).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data:** Includes billing address, delivery address, email address and telephone numbers.
- **Financial Data:** Includes bank account and payment card details.
- **Transaction Data:** Includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** Includes Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data:** Includes your username and password, purchases or orders made by you, your interests, preferences, and feedback/survey responses.
- **Usage Data:** Includes information about how you use our website, products and services.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing

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from us and our third parties as well as your communication preferences.

We also collect, use and share Aggregated Data, such as statistical or demographic data, for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you decline to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you at the time if this is the case.

How we collect your data

We collect your data through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:

- Apply for our products or services
- Create an account on our website
- Subscribe to our service or publications
- Request marketing to be sent to you

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- Enter a competition, promotion or survey
- Give us feedback or contact us

Automated technologies or interactions. When you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites which use our cookies.

How we use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- We need to perform the contract we are about to enter into or have entered into with you
- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- We need to comply with a legal obligation

The specific legal grounds we are relying on to process your personal data are set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	- Identity - Contact	Performance of a contract with you
To process and deliver your order including: - Manage payments, fees and charges. -Collect and recover money owed to us.	- Identity - Contact - Financial - Transaction - Marketing and Communications	- Performance of a contract with you. - Necessary for our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include:	- Identity - Contact	- Performance of a contract with you

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<p>-Notifying you about changes to our terms or Privacy Policy -Asking you to leave a review or survey</p>	<ul style="list-style-type: none"> - Profile - Marketing and Communications 	<ul style="list-style-type: none"> - Necessary to comply with a legal obligation - Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To enable you to participate in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> - Identity - Contact - Profile - Usage - Marketing and Communications 	<ul style="list-style-type: none"> - Performance of a contract with you - Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> - Identity - Contact - Technical 	<ul style="list-style-type: none"> - Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) - Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> Identity Contact Profile Usage Marketing and Communications Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing,</p>	<ul style="list-style-type: none"> - Technical - Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and</p>



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customer relationships and experiences		services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none">- Identity- Contact- Technical- Usage- Profile- Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product/service purchase, warranty registration, product/service experience or other transactions.



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Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

“For How Long Will You Use My Personal Data?”

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or

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reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.

By law, for tax purposes we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction data) for a period of six years after they cease being customers. In some circumstances you can ask us to delete your data: See 'Your Legal Rights' for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Request the transfer of your personal data to you or to a third party. We will provide your personal data to you, or a third party you have chosen, in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.