

Privacy Statement

1 Introduction

Your privacy is important to NewGen Group and your personal information is dealt with in the Privacy and Data Retention Policy. This Privacy Statement sets out the practices applicable to the protection of personal information on the NewGen Group online services.

2 About the Company

NewGen Group, its subsidiaries and affiliates are leading South African management consulting and technology services companies.

3 Definitions

“Personal Information” means information relating to identifiable, living, natural persons and where it is applicable, identifiable, existing juristic person, including information as defined in the Protection of Personal Information Act 4 of 2013.

“NewGen Group”, “we” or “our” means New Generation Group (Pty) Ltd, its subsidiaries and affiliates.

“You” or “your” means any person that we collect personal information from during interactions with us, whether online, including through our websites, social media sites and mobile applications that link to this Policy, in writing or orally, or personal data that we may collect offline or receive from third parties.

“Online Services” means interactions through our websites, social media sites and mobile applications.

4 Use of Information

NewGen Group is committed to ensuring the confidentiality and security of your personal information. NewGen Group will use your personal information to enhance your experience, the service the NewGen Group provides to you and to communicate with you unless expressly directed by you not to do so.

5 Information we collect

In general, you may interact with the NewGen Group without revealing any personal information. There are times, however, when NewGen Group or its partners request information from you.

If requested, you may choose to give personal information such as your name, address, postal address, email address and gender. The personal information may be required, to correspond with you, to process an order, or to provide you with further information.

NewGen Group may also collect other information that does not personally identify you. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, primary language. If we link this information with your personal data, we will treat that linked information as personal information.

6 Information security and quality

NewGen Group intends to protect the quality and integrity of your personal information. NewGen Group has implemented appropriate technical and organizational information security measures to help it keep your information secure, accurate, current, and complete.

NewGen Group will make commercially reasonable efforts to respond to your requests to correct inaccuracies in your personal information in a timely manner.

7 Sensitive personal data

NewGen Group does not collect sensitive personal data about you, e.g. information relating to your health, religion, political beliefs, race or sexual orientation and ask that you do not send or provide this information to us.

8 How we collect your personal data

We may collect your personal data from you in a variety of ways when you interact with us, including:

When you access our Online Services, or interact with us in any other way, or use our solutions and services:

- You place orders for our solutions and services
- Create an account with us
- Your orders are processed and the associated payment transactions
- Perform administrative and business functions
- Market our solutions and services to you
- You subscribe to our mailing lists and newsletters.

When you communicate with us:

- We respond to your inquiries and requests,
- Obtain feedback from you about our solutions and services
- Applying for employment with us.
- Social media sites
- Business partners with whom we offer co-branded services or engage in joint marketing activities
- Third parties that provide list enhancement or similar services

When you use our online services, we may, and third parties we engage may automatically collect data, including personal data through use of cookies and similar technologies. For more information, see the "Cookies and Similar Technologies" section below.

9 Legal basis for processing your personal data

When we process your personal data in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:

- Our legitimate interests for the purpose of managing, operating or promoting our business, including direct marketing and intra- NewGen Group transfers of personal data for business and administrative purposes, except where such interests are overridden by your interests or fundamental rights or freedoms which require protection of personal data
- Where this is necessary to comply with a legal obligation on us
- To protect the vital interests of any individual
- Where you have consented

10 Use of your personal data

We may use your personal data to enable you to effectively use and to improve our solutions and services. For example, to:

- Perform administrative and business functions and internal reporting
- Send administrative information to you
- Obtain feedback from you about our services and solutions including through client satisfaction surveys, in which event, we will only use your personal data for the sole purpose of sending you a survey.
- Respond to your inquiries and fulfil requests by you
- Assess the performance of our online services and to improve their operation
- Inform you about and provide you with our services and solutions
- Update our records and keep contact details up to date

We engage in these activities to manage our contractual relationship with you, to comply with our legal obligations, or for our legitimate business interests.

Provide you with marketing materials and to personalise your experience. For example, to:

- send marketing communications to you.
- provide you with a more personalised experience when you interact with us.
- enable you to subscribe to our newsletters and mailing lists.
- enable you to register for NewGen Group events, workshops and seminars.

We engage in these activities with your consent or for our legitimate business interests.

Achieve our business purposes and analyse information. For example, to:

- establish, manage, and maintain our business relationship with you.
- compile usage statistics for our online services.
- recruit staff.
- process and respond to privacy requests, questions, concerns and complaints.
- fulfil legal and contractual obligations.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation and for our legitimate business interests.

11 Sharing your personal data

We may share your personal data for the purposes set out in this Privacy Statement (as applicable):

- With our affiliates and subsidiaries for the purposes set out in this Privacy Policy. NewGen Group is the party responsible for the management of jointly used personal data
- With business partners with whom we offer co-branded services or engage in joint marketing activities
- Where you consent to the sharing of your personal data
- In connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company
- We may share your personal data in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process
- Where necessary to comply with judicial proceedings, court orders or government orders
- To protect the rights, property or safety of NewGen Group, its business partners, you, or others, or as otherwise required by applicable law.

Any third parties with whom we share personal data are contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

12 Cookies and Similar Technologies

When you access our Online Services, we use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage (HTML 5). We use cookies to assist us with activities such as:

- Authenticating you
- Keeping track of information, you have provided to us
- Improving your browsing experience
- Customising our interactions with you
- Storing and managing your preferences and settings
- Compiling statistical data
- Analysing the performance and usability of our Online Services
- Measuring traffic patterns
- Determining which areas of our Online Services have been visited

These technologies collect information that your browser sends to our Online Services including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

Our Online Services may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your activities across our Online Services to help us compile aggregated statistics.

13 Retaining your personal data

We will retain your personal data for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain personal data, or as part of an investigation or for litigation purposes
- Personal data is needed to maintain accurate business and financial records
- There are automated means to enable you to access and delete your personal data at any time
- The personal data is sensitive personal data in which event we will generally retain this for a shorter period of time
- You have consented to us retaining your personal data for a longer retention period, in which case, we will retain personal data in line with your consent.

14 Updates to this Privacy Policy

We may update this Privacy Statement at any time.

We encourage you to regularly review this Privacy Statement to stay informed about our privacy practices.

15 How to contact us

If you have any questions about how your personal data is handled by The NewGen Group, you have a privacy concern or you wish to make a request or a complaint relating to your personal data, please contact us.

You can reach us at info@newgengroup.co.za.