

## Privacy Policy

red24 is committed to protecting and respecting your privacy. Any personal information that you divulge when registering for, or using this website, or in the course of requesting various products or services via this website, will only be used in accordance with this privacy statement. red24 plc includes both red24 Sales Limited and red24 CRM (Pty) Ltd (hereinafter referred to as 'We', 'Our' and 'Us'). Details of our registered office addresses and VAT numbers are set out at the end of this document.

Please read the following policy carefully to understand our views and practices regarding your personal data and how we will treat it. This policy (together with our terms of website use located at <http://www.red24.com/legal/TOW.pdf> and any other documents referred to in it) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us.

For the purpose of the Data Protection Act 1998 ("the Act"), the data controller is red24 Sales Limited of The Coach House, Bill Hill Park, Twyford Road, Wokingham, Berkshire, RG40 5QT.

### Information requirements – Web Site Membership

We may collect, request and process the following data when you apply for membership to red24 site(s):

- Information that you provide on our website <http://www.red24.com>. This includes information provided at the time of registering to use our site, subscribing to our standard online services:
  - Name
  - Verification of membership details
  - Contact information, including email and postal address
  - Contact preferences
    - Preferred communication channel
    - Preferred language

### Information requirements – Electronic Service Requests

We may collect, request and process the following data when you make a specific request to red24:

- Information required to identify your request or issue.
- Information required to satisfy your request or issue.
- We may also ask you to voluntarily complete a follow-up response to ensure that:
  - Service requests have been fulfilled as per your expectations
  - Our service level delivery levels are consistent and acceptable

Please note, that if you contact us, we may keep a record of that correspondence for follow-up and archival purposes. Client service information is typically retained for up to 18months.

### Web Visitor Statistics, IP Address and cookies

We may collect statistical information about visitors to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise.

We may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and

does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service, such as to:

- Estimate our audience size and usage pattern.
- Store information about your preferences, and so allow us to customise our site according to your individual interests.
- Speed up your searches.
- Recognise you when you return to our site.

Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website.

#### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over those websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### **Personal data storage**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by personnel operating outside the EEA who work for us or for one of our vetted suppliers. Such personnel maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of security and other services. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a personalised registration code which enables you to access certain parts of our website, you are responsible for keeping this personalised registration code confidential. The personalised registration code should not be shared with anyone.

Unfortunately, the security of information transmitted via the internet cannot be completely guaranteed. Although we will take all reasonable measures available to us to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **Information usage**

We use information held about you in the following ways:

- Internal record keeping.
- To improve our products and services.
- To ensure that content from our website is presented in the most effective manner for you and for your computer or to customise the website according to your interests.

- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

**Disclosure of your information**

We may disclose your personal information to any member of our group, which includes our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985. We may also disclose your personal information to third parties in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If red24 Sales Limited, or a substantial percentage of its assets, is acquired by a third party, and the personal data held by it about its customers is one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of website use located at <http://www.red24.com/legal/TOW.pdf> or product terms and conditions located at <http://www.red24.com/legal/TC.pdf> and other agreements; or to protect our rights, property, or safety of our personnel, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [enquiries@red24.com](mailto:enquiries@red24.com) or via the address below.

**Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the address below, or on [enquiries@red24.com](mailto:enquiries@red24.com). We will promptly correct any erroneous or incomplete information.

**Amendments**

red24 may change this policy from time to time. You should check this policy regularly to ensure that you are happy with any changes. This policy is effective from 14 October 2009.

**Enquiries**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [enquiries@red24.com](mailto:enquiries@red24.com).

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| red24 Sales Limited, a wholly owned subsidiary of red24 plc | red24 CRM (Pty) Ltd, a wholly owned subsidiary of red24 plc              |
| The Coach House<br>Bill Hill Park<br>Wokingham              | Greenwood Chartered Accountants<br>21 <sup>st</sup> Floor<br>ABSA Centre |

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| Berkshire<br>RG40 5QT<br>Company Number: 4004496<br>Registered in England and Wales<br>VAT Number: 823845027 | Heerengracht Street<br>Cape Town<br>8001<br>Company Number: 2002/012490/07<br>Registered in South Africa<br>VAT Number: 4310205572 |
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