



ORGRO PRIVACY POLICY

Orgro is committed to protecting and respecting your privacy and to be acting in compliance with legal requirements including the Protection of Personal Information Act No.4 of 2013 (POPIA) and the General Data Protection Regulation (GDPR, EU 2016/679). This document describes Orgro's policies regarding the collection, use and disclosure of personal data when you use our services, and your choices associated with that data.

Orgro holds individual privacy to be of primary importance throughout its business practices and is committed to the confidentiality and safeguarding of all personal information collected. This Privacy Policy is inclusive to all Orgro online platforms, including its commercial website, social media platforms, and assessment portal.

Definitions

Service

Service refers to the <https://www.orgro.co.za/> website, operated by Orgro.

Personal Data

Personal Data is information which relates to an identified or identifiable living individual.

Cookies

Cookies are small files/pieces of data, stored on your device (computer or mobile device) while browsing websites. Cookies are built specifically to track, personalise and save information about a user's session online.

Information Collection and Use

Whether you are a customer, supplier, or other business contact, respondent, or staff member, we will collect and use some of your personal data in the manner and for the reasons set out in this Privacy Policy.

Types of Data Collected

- **Personal Data**

While using our products and service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, inter alia:

- First name and last name
- Identity and demographic information (such as information relating to your age, gender, race/ethnicity, education, and occupation)
- Contact data – telephone and email address
- Company name
- Phone number

- **Tracking Cookies Data**

Cookies are small text files which a website transfers to your computer's browser, and are used by many websites to perform a number of functions, such as remembering your preferences, and counting the number of people looking at a specific website.

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Orgro uses cookies as part of our marketing campaign (via Google AdWords) to measure traffic patterns and as a means to provide relevant products and services to our clients. We have implemented certain Google Analytics features for the primary purpose of attempting to ascertain the success of our online marketing endeavours via the Google AdWords platform.

By visiting this site, you agree that certain of our Google AdWords remarketing and or other advertisements can follow you as you visit other web sites that forms part of Google's Display Network (GDN). You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Note that we shall under no circumstances be utilizing any personally identifiable information as obtained through our Google AdWords remarketing campaign in any other related marketing endeavours – online or otherwise. (Such restricted utilization of information includes the sharing of such with third parties.)

Orgro shall under no circumstances be using any sensitive information of any nature on any of our remarketing tags.

Orgro shall duly endeavour to adhere to all of the current in-effect policies of Google related to remarketing or any other form of Google advertising in all of its Google AdWords marketing campaigns. (In instances of possible non-conformity to such, the Company shall endeavour to rectify such in a prompt manner.)

Data is collected under the following circumstances:

When such personal information is submitted, it is only processed for the purposes for which you have submitted it to us. You may choose not to provide certain information, however, your decision not to provide certain information may limit the use of the products and services available to you.

- Prior to, at commencement, and during the term of a contractual relationship when you request our products, assessments, tools, and services;
- When you complete forms on our websites or submit forms via email for any purpose, including subscribing to our services and offerings, or using further services;
- When you contact us, visit us, report a problem or request to us, provide feedback to us, or complete an assessment or survey;
- When you interact with us through our website, over the phone, email, or social media.
- When you complete a psychometric assessment or other questionnaires. Completing of such psychometric and other assessments and personal data is related to our business as a provider of business psychology services.
- To market our products and services
- To notify you about changes to our products and services
- To monitor the usage of our products and services
- To detect, prevent and address technical issues

Why personal data is used

- **Customers**

Personal data of customers is used:

- To provide you with the products and services that you request from us;
- To manage our contractual relationship on an effective and ongoing basis;
- For customer administration including contractual management, invoicing, and effective communication;
- To seek your views, understand your needs, and gather your perceptions of our products and services;
- For technical support and administration of our products, services, and sites.



- **Respondents**

Personal data collected from respondents taking our assessments will be used:

- To provide, on request from practitioners and/or your organisation personalised- and computer-generated reports derived from your responses on any of our assessments, including via our web-based scoring and delivery platform(s). Combined data from other respondents is also found in team reports, 360-degree reports, and culture/climate surveys.
- If you fail to provide such data as is mandatory for scoring and interpreting an assessment(s), we may not be able to fulfill the terms of our contract or relationship we have with you or the consultant managing your assessment process.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers that are located outside your province, country or other jurisdiction, where the data protection laws may differ from those of your jurisdiction.

If you are located outside South Africa and choose to provide information to us, please note that we transfer the data to South Africa and process it there.

Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer.

Orgro will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

No transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place, including the security of your data and other personal information.

Service Providers

We may employ third party companies and individuals to facilitate our products and services (“Service Providers”), provide the products and services on our behalf, perform products and services related services or assist us in analysing how our products and services is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Disclosure of Data

Releasing Reports

We share your data with the appropriately qualified practitioner who is trained to work with the assessment data and who has requested that you take the assessment(s). They are obliged to provide appropriate feedback on the assessment results as contracted with the client.

Such a qualified party is professionally and legally bound to working with your results in an ethical, confidential, and legally compliant manner.

The practitioner may also share the results (or a summary thereof) with another practitioner or professional services team within the same organisation, provided that you are informed that this will occur, and that you have agreed by providing written consent.

Legal Requirements

Orgro may disclose your Personal Data in the good faith belief that such action is necessary:

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- To comply with a legal obligation
- To protect and defend the rights or property of Orgro
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but please remember that no method of transmission over the Internet or method of electronic storage is 100% secure.

While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Orgro ensures the security and integrity of personal information through a variety of security measures which include physical, technical, and organisational measures.

Our consultants are bound to comply with confidentiality provisions and privacy statements as set out by the HPCSA. We have various policies that specifically address responsibilities and expected behaviour with respect to the protection of confidential information.

Respondent data is only available and accessible by selected Orgro staff that support and administer the scoring and report-generation systems, including our web-based scoring and delivery platform.

The assessment site resides in a secure hosted environment. The site is secured with username/password fields preventing anonymous access to the information. It should be noted that Orgro has provided you with a username/password which enables you to access certain parts of the website, or use our products and services, for which you are responsible to keep in confidentiality. These details should not be shared with anybody.

Respondent data access is based on a need to know basis.

We have procedures for incident and breach investigation and notification. Where our impression of the likely risk to the individuals involved concludes that a breach of personal data may result in risk to the rights and freedom of individuals, we shall promptly inform the individuals and legal authority of such a breach as is required by law and in accordance with any contractual terms.

Web Security

(still in progress)

How long we keep your data

We are bound by South African legislation (The Health Professions Act No. 56 of 1974) to keep psychological test data for five to seven years. Such data will be securely archived. We will only retain your current personal data for as long as it is necessary to fulfill the purposes for which the data is collected, including for the purposes of satisfying the needs of legal, organisational, third party, accounting, or reporting requirements. Thereafter it will be archived. The periods we retain data for are set out in our POPI Policy: Data Retention and Destruction.

To determine the appropriate retention periods for personal data, we consider the amount, nature, and sensitivity of the data, the potential harm from unauthorised use or disclosure, the purposes for which we process the personal data, and whether we can achieve these purposes through other means, including applicable legal requirements and statutory retention periods.

Links to Other Sites

Our products and service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

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We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

Opt-out

Orgro provides the option for you to opt-out of communication conducted via email or to unsubscribe from any email correspondence, listings, newsletters, or marketing information, and in doing so will no longer receive further email communications.

You may opt out of seeing advertisements for web site, by simply clicking here: – [https://www.google.com/policies/technologies/ads/.](https://www.google.com/policies/technologies/ads/)

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via a prominent notice on our products and services, prior to the change becoming effective, and we will update the "Effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about Orgro's Privacy Policy, please contact us on info@orgro.co.za

