

## GLS Consulting – Software Client Data - Privacy Policy

Ver 1.06: Updated 2021/07/13

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### General

Our data privacy policy conforms to the South African Protection of Personal Information (POPI) Act that is aligned with the European General Data Protection Regulation (GDPR).

Being part of the EOH group of companies, the EOH Privacy Policy applies in general to all business units, as well as to GLS Consulting and its staff. A copy of this policy is available on request from [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) or found at the very bottom of [www.eoh.co.za](http://www.eoh.co.za). The information below pertains specific to GLS Consulting – Software Clients Data.

Generally you can browse through our website without giving us any information about yourself. When personal data is required, e.g. on the contact form, this policy describes how that information is collected and used.

We do not knowingly allow access or collect any personal data from minors. The GLS Consulting Software is targeting adults with or busy with tertiary education. If we become aware a user under the age of 18 had provided personal data without parental consent, we will delete the personal data from our records.

By proceeding to install and activate the GLS Consulting Software, you agree to this policy. Should you disagree, simply cancel the installation or activation and uninstall the software from your computer.

### **What personal data do we collect on software activation and from the website contact form**

We collect some basic personal information to identify you, such as your name, company name, and email address when you activate the GLS Consulting Software. The public IP address of your computer and a uniquely generated computer identifier will also be automatically collected during software activation. We validate some data, e.g. email address.

### **Optional personal data what we collect on software activation and website contact form**

Optionally your business address, business telephone number and your computer name can also be provided. By leaving them blank, you opt not to provide them.

### **Optional personal data that we collect when you register on our client portal**

A password is required to be entered. The security of the portal is managed by our international CRM provider.

### **Optional computer data that we collect if you provide consent on software activation and license activation**

We automatically collect some standard device details from your computer, i.e. the operating system type, CPU type & amount of computer memory, device name, screen resolution and version of the GLS Software installed, only if you provide consent. The date and time of your consent is recorded.

### **Additional data that you may provide when taking part in a course**

Should you take part in one of our courses, and should you require a South African Continued Professional Registration (CPD) certificate, we will require you to enter part of your ID number on our secure online portal. This data is stored in an encrypted form by our international CRM provider and is solely used by selected GLS Consulting staff for the requirements of our accreditation international service provider, to issue your CPD points.

### **Opting out of marketing email**

On registration of a trial edition and/or licensed edition of the GLS Consulting Software, you receive a welcome email. You have the right to opt out of marketing email from GLS Consulting. All automated emails from GLS Consulting have a banner at the bottom, with simple instructions to permanently opt out of marketing email. Your choice is recorded with date and time, and the preference is stored in the database of our international CRM provider and automatically applied to all future marketing email sent by GLS Consulting.

### **Cookies, tracking technologies and logfiles on our website**

When you visit our website, third parties such as our international analytics providers use cookies, web beacons, and other technologies to collect information about your online activities over time and across different websites or online services. As is true with most web sites, we collect certain data automatically and stores it in log files. This information could include internet protocol addresses as well as browser, internet service provider, referring/exit pages, operating system, date/time stamp, and click stream data. Occasionally we may connect personal information to data gathered in our log files, as necessary to improve our service to individual customers. Otherwise we mostly use this information with no connection to individual users, to analyse trends, administer our site, or track usage of various features within our site.

### **Data processor function for GLS CSC Web Application**

The GLS CSC Web Application allows the entry of CSC Applicant & Technical contact information. GLS Consulting acts as *Data Processor* with respect to this personal data and it is your responsibility as *Data Controller* to acquire any consent from the effected parties. GLS Consulting will not use this data for any purpose other than generating the CSC PDF report on your request for your use. The data is stored in the database of our local service provider. Their POPI data privacy policy is available on request from [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html).

### **Secure international transfer of personal data**

All personal data captured in the GLS Consulting Software is automatically transferred on end-user confirmation, via encrypted secure socket layer technology (SSL) to our international licensing provider for exclusive use only by GLS Consulting. The data is then securely and automatically transferred to our international web application integration partner. Finally the data is securely and automatically transferred to our international CRM provider. They are collectively referred to as our international service providers.

In terms of the POPI Act and GDPR, GLS Consulting is the *Data Controller* and *Data Processor*, and our international service providers are only the *Data Processors* of your personal data.

## **Secure storage of data**

No personal data is stored at GLS Consulting.

An encrypted copy of your registration data is stored locally on your own computer. All data stored at our international service providers is securely stored and they have policies in place to protect the confidentiality of your personal data and to protect your personal data from loss, damage and unintended destruction.

We have license agreements in place with our international service providers. They all conform to GDPR or equivalent regulation and their data privacy policy is available on request from [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html). When GLS Consulting is made aware of in the unlikely case of a data breach at its international service providers, you will be informed via email, if you were affected.

## **Intended purpose and data sharing policies**

Your personal data is solely collected and stored for use by selected staff at GLS Consulting to understand better who is using our trial software; to support and stay in contact with our licensed users and to market GLS Consulting products and services to you.

The optional personal and computer data is used to enhance user support and to improve our GLS Consulting Software product offering in future.

The personal data will never be shared or sold by GLS Consulting to other third parties, unless required by court order.

## **Data retention**

GLS Consulting will retain personal data for as long as needed to provide the service to you, our client, subject to this policy and to comply with legal obligations. Records with no activity, older than 3 years may be deleted periodically.

## **Your right to update your personal data**

You can update your personal information automatically yourself at any time by going to *Help/Support/Authorize/Update Registration Info* in any of the GLS Consulting Applications or you can send a request via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity.

## **Your right to request a copy of your personal data**

You may request a copy of all your personal data collected by GLS Consulting as a human readable PDF document via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task and the data will be available for download from a secure server.

## **Your right to delete your personal data**

You can request to have all your personal data collected by GLS Consulting deleted via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. For personally assigned software licenses, this may result in the loss of your license and the inability to continue using the GLS Consulting Software. You will be notified via email of completion of this task.

### **Your right to withdraw general consent**

You can request to withdraw general consent for GLS Consulting to use your personal data collected by GLS Consulting via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

### **Your right to withdraw consent to use optional data**

You can request to withdraw consent for GLS Consulting to use your optional computer or optional personal data collected by GLS Consulting via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

### **Your right to be notified should your personal data be provided to any other entity for legal reasons**

Should your personal data have to be provided to another entity for legal reasons, you will be notified via email within 30 days.

### **Changes to the Privacy Policy**

If we make substantial changes to this policy we will notify you via email at least 30 days before they are implemented. Should you not want to accept the updated Privacy Policy, you have the right to terminate our services, by sending us a notification via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) or email via [support@glz.co.za](mailto:support@glz.co.za) within 30 days. We will consider refund requests where applicable.

The latest copy will always be available on our website under, <https://www.gls.co.za/software/privacy/>

### **Additional data available on request**

A list of all personal data items with their purpose for the different systems is stored securely in a data inventory at our international CRM provider is available via [www.gls.co.za/software/contact.html](http://www.gls.co.za/software/contact.html) where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

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### **History of Changes**

Ver 1.03: Updated 2021/04/29 (Updated **Additional task implemented**, EOH Policy reference)

Ver 1.04: Updated 2021/05/20 (Minor edits)

Ver 1.06 Updated 2021/07/13 (Minor edits)