



Tech Law

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WEBSITE PRIVACY POLICY

1. INTRODUCTION

This Privacy Policy ("Policy") governs the Processing of Personal Information by Zella Tech Law ("We", "Us", "Our", "Ourselves") in accordance with Applicable Data Protection Laws and in connection with the Zella Tech Law Website (www.zellatl.co.za). The Data Subject's ("You", "Your", "Yourself/ves") use of the Website is subject to this Policy and the Terms of Use which are incorporated by reference into this Policy. In general, by visiting/engaging with the Website, You signify Your Consent to Our Processing Your Personal Information in accordance with this Policy.

We respect Your rights to responsible management of Your Personal Information under the Protection of Personal Information Act 4 of 2013 ("POPIA"), and where applicable, the relevant Applicable Data Protection Law in Your specific jurisdiction. For the purposes of this Policy, and interpreting the applicable provisions to you:

- **Part A:** addresses POPIA and is applicable to Users living in the Republic of South Africa.
- **Part B:** addresses other Applicable Data Protection Laws and is applicable to Users residing in various jurisdiction in Africa.
- **Part C:** addresses the general clauses applicable to all Users who access Our Website.

We are committed to the principle of accountability in maintaining the integrity and confidentiality of Your Personal Information collected or received by Us when You use Our Website, as well as ensuring transparency between Ourselves and You. Accordingly, We encourage You to read this Policy carefully and contact Us with any questions or concerns in regard to Our privacy practices. We may amend this Policy at any time. All amended terms shall be effective immediately upon the posting of the revised Policy on Our Website and any subsequent activity in relation to Our Website shall be governed by such amended terms and conditions.

If You do not agree with any term in this Policy, please do not visit Our Website, or contact Our Information Officer, Komeszni Patrick: komeszni.patrick@zellatl.co.za.

This Policy was last revised on 20 August 2025

You are advised to regularly visit the Website for any amendments or updates to this Policy.

For enquires, contact Our Information Officer.

1. GENERAL DEFINITIONS

- 1.1. **"Aggregate/Aggregation/Aggregated"** shall mean the process of combining, summarising, or grouping Data or information from multiple Users to create a summarised and anonymised dataset which includes key metrics, trends, themes, insights, or patterns derived from individual User Data without revealing any Personal Information and/or Personal Data. Such dataset shall be used by Us to inform Our research, Web-App development and improvement and to draft progress reports to track Our progress with Our business objectives and goals.
- 1.2. **"Applicable Data Protection Laws"** shall mean all legislation, regulations or guidance notes protecting the fundamental rights and freedoms of individuals in a specific jurisdiction in terms of their right to privacy with respect to the Processing of their Personal Information and/or Personal Data.
- 1.3. **"Business Hours"** shall mean the hours between 08h00 and 16h30 from Monday to Friday.
- 1.4. **"Cookies"** means the small text files that are downloaded onto the User's device when he/she/it accesses Our Website.
- 1.5. **"Content"** shall mean to include without limitation, any audio, blogs, data, figures, illustrations, images, information, interactive features, text, resources, User testimonials, videos, PDFs, in whole or in part housed or contained, displayed, provided or otherwise made available on or through the Website by us.
- 1.6. **"Data"** shall mean raw facts, figures, or information that is collected from Users, Processed, and analysed for research, and website development purposes.
- 1.7. **"Data Subject"** shall mean the natural person who owns the Personal Information and/or Personal Data that is to be Processed by Us using Our Website.
- 1.8. **"Electronic Signatures"** shall mean data attached to, incorporated in, or logically associated with other data and which is intended by the user to serve as a signature, as defined in the Electronic Communications and Transactions Act 25 of 2002 and/or any other applicable legislation.
- 1.9. **"Employees"** means any person employed by Zella Tech Law to render services which meet Zella Tech Law's goals and objectives and who is entitled to receive remuneration.
- 1.10. **"Process/Processing"** shall mean any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information and/or Personal Data, including: the collection, receipt, recording, organisations, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.11. **"Services"** shall mean the expert guidance and tailored solution services provided by Zella Tech Law to clients in the technology sector and/or working with different types of technology and include legal advisory, mentoring and coaching as well as research and development.
- 1.12. **"Social Media Pages"** shall mean Zella Tech Law's official profiles and/or accounts on various social media platforms such as LinkedIn, Instagram and TikTok which We use to engage with Our Users, share content, promote Our services and build brand awareness
- 1.13. **"South African Information Regulator"** shall mean the independent body established under the Protection of Personal Information Act (POPIA), 2013 in South Africa whose mandate is to monitor and enforce compliance with the Applicable Data Protection Laws.

- 1.14. **"Third-Party/ies"** shall mean any other natural or juristic person that is not You, the User, or Ourselves.
- 1.15. **"User, You, Yourself/ves"** shall mean a natural or juristic person who uses Zella Tech Law's Website for informational purposes.
- 1.16. **"Website"** shall mean the Zella Tech Law Website, available at www.zellatl.co.za and owned and operated by Zella Tech Law.
- 1.17. **"Zella Tech Law, We, Us, Our"** shall mean Zella Tech Law (Pty) Ltd, a private company registered in terms of the company laws of the Republic of South Africa, with registration number 2021/921952/07.

2. WHO WE ARE

- 2.1. Zella Tech Law is a private company registered in terms of the laws of the Republic of South Africa. We are a legal consultancy specialising in tech law advisory Services for businesses who have technology and innovation at their core, to promote an ease of understanding with practical application. We own the Website which serves to inform You and others on the Zella Tech Law's service offerings. The Website is not an e-commerce platform.
- 2.2. The Website collects and Processes Personal Information and/or Personal Data of its Users. We do not collect Special Personal Information and/or Sensitive Data of Our Users and/or any other Personal Information and/or Personal Data of Children.

PART A: The Protection of Personal Information Act, 2013

Part A is only applicable to Users who are South African citizens or resident in South Africa.

1. POPIA DEFINITIONS

- 1.1. **"Child/Children"** shall mean a natural person under the age of 18 years who is not legally competent, without the assistance of a Competent Person, to take any action or decision in respect of any matter concerning him- or herself.
- 1.2. **"Competent Person"** shall mean any person who is legally competent to Consent to any action or decision being taken in respect of any matter concerning a Child which may include a Parent or Legal Guardian.
- 1.3. **"De-identify"** shall mean in relation to Personal Information of a Data Subject, to delete any information in a way that identifies the Data Subject; can be used or manipulated by a reasonably foreseeable method to identify the Data Subject; or can be linked by a reasonably foreseeable method to other information that identifies the Data Subject.

- 1.4. **"Electronic Signatures"** shall mean data in electronic form which is attached to or logically associated with other data in electronic form, and which is intended by the User to serve as a signature; as defined in the Electronic Transactions and Communications Act, 2002 ("ECTA").
- 1.5. **"Information Officer"** shall mean in the case of a juristic person, the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or the person who is acting as such or any person duly authorised by such acting person. In the case of Zella Tech Law, this position is filled by Komeskni Patrick.
- 1.6. **"Operator"** shall mean a person who Processes Personal Information on behalf of a Responsible Party in terms of a contract or mandate, without coming under the direct authority of the Responsible Party.
- 1.7. **"Personal Information"** shall mean information relating to an identifiable, living, natural person and where it is applicable, to an identifiable, existing juristic person, including but not limited to:
- 1.7.1. information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- 1.7.2. information relating to the education or the medical, financial, criminal or employment history of the person;
- 1.7.3. an identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- 1.7.4. the biometric information of the person;
- 1.7.5. the personal opinions, views or preferences of the person;
- 1.7.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- 1.7.7. the views or opinions of another individual about the person; and
- 1.7.8. the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.
- 1.8. **"Protection of Personal Information Act, 2013 (POPIA)"** shall mean South Africa's primary data protection law which gives effect to the constitutional right to privacy.
- 1.9. **"Record"** shall mean any recorded information:
- 1.9.1. regardless of form or medium, including any of the following:
- (a) writing on any material;
 - (b) information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - (c) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - (d) book, map, plan, graph or drawing;
 - (e) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
- 1.9.2. in the possession or under the control of a Responsible Party;
- 1.9.3. whether or not it was created by a Responsible Party; and

- 1.9.4. regardless of when it came into existence.
- 1.10. **"Responsible Party"** shall mean a public or private body or any other person which alone or in conjunction with others, determines the purpose and means for Processing Personal Information. For the purposes of this Policy, We are the Responsible Party in relation to Personal Information You submit through the Website.
- 1.11. **"Special Personal Information"** shall mean Special Personal Information as defined by the Protection of Personal Information Act, 2013.

2. PERSONAL INFORMATION

- 2.1. The Website collects and Processes the Personal Information of its Users for the purposes listed in 2.4 below. The Processing of Personal Information is conducted in accordance with this Privacy Policy.
- 2.2. It is the duty and responsibility of the Responsible Party to direct the User to the terms and conditions of this Privacy Policy.
- 2.3. Consent For Collection and Processing
- 2.3.1. By submitting Your Personal Information when accessing or otherwise using the Website, You agree to the terms and conditions of this Policy. You expressly Consent to the Processing of Your Personal Information in accordance with this Policy.
- 2.3.2. You understand that Your Consent to the Processing of Your Personal Information by Us relates strictly to the purposes specified below in clause 2.4.
- 2.3.3. By visiting Our Website, You represent and warrant that You are 18 years of age or older. If You are a Child, You undertake to obtain Your Competent Person's Consent before accessing or using Our Website.
- 2.3.4. We encourage Competent Persons to monitor the online activities of their Children at all times, however, if a Competent Person becomes aware that their Child has provided their Personal Information to Us without their Consent, the Competent Person is required to contact Our Information Officer in order to exercise any of Your Data Subjects' rights listed in clause 8 below.
- 2.3.5. Should We become aware that We have collected and Processed the Personal Information of a Child, without their Competent Person's Consent, We will take reasonable steps to permanently delete that Personal Information.
- 2.3.6. You warrant that the Personal Information submitted through the Website relates to You and not a Third Party. Where You submit the Personal Information of a Third Party, You warrant that You are legally entitled to do so.
- 2.3.7. You expressly Consent to Us keeping Your Personal Information once Your relationship with us has been terminated for Aggregate, statistical and reporting purposes. Such Personal Information will be De-identified and cannot be used to identify You personally.

2.3.8. In the event that You wish to revoke all Consent pertaining to Your Personal Information and You would like us to remove and/or delete Your Personal Information entirely, You are encouraged to contact Our Information Officer whose role and contact details are set out in clause 8 below.

2.4. Purpose For Collection and Processing

We primarily collect and Process Your Personal Information, collected or received from You in accordance with Your use of Our Website. We Process Your Personal information for the following purposes:

- 2.4.1. To inform You about Our Services and other activities;
- 2.4.2. To facilitate communication between Us and You, the User;
- 2.4.3. To engage in market research, gauge User satisfaction with Our Website based on analytical use information;
- 2.4.4. To respond to any queries submitted by You either through the Contact Us form or sent by You over email;
- 2.4.5. To develop, improve and fix bugs on Our Website;
- 2.4.6. To comply with the law, specifically in response to a demand from government authorities where such demand meets the legal requirements; and
- 2.4.7. To achieve other purposes as authorised or required by law (e.g., to prevent a threat to life, health or safety, or to enforce Our legal rights).

2.5. We share Your Personal Information with relevant Third Parties so that We may provide the Website to You. We may share some or all of Your Personal Information with the following entities:

- 2.5.1. Google Analytics - for the purpose of tracking traffic to and understanding user interaction with Our Website.
- 2.5.2. GoDaddy - for the purposes of hosting Our Website. You can find more information on GoDaddy's Privacy Policy [here](#).

2.6. We expressly acknowledge and undertake that We do not use any Personal Information for any other purposes not described above.

2.7. We expressly acknowledge and undertake to not use any Personal Information for any other purposes without Your Consent or as required by law.

3. WHAT WE COLLECT AND HOW

3.1. We collect, Process, and retain certain Personal Information from You in connection with Your use of the Website. We only collect Personal Information in the following ways:

- 3.1.1. When You visit the Website for informational purposes;
- 3.1.2. When You complete a Contact Us form on the Website;
- 3.1.3. When You interact with Us on any of Our Social Media Pages; and
- 3.1.4. When You send an email to Us or call Us.

- 3.2. We collect the following Personal Information when You visit the Website for information purposes –
 - 3.2.1. Your internet protocol (“IP”) Address;
 - 3.2.2. Your browser type and version;
 - 3.2.3. Your operating system name and version;
 - 3.2.4. Date of Your visit to Our Website;
 - 3.2.5. The type of electronic device You are using;
 - 3.2.6. Your location information; and
 - 3.2.7. Your online behaviour, including cookies that track Your browsing of the Website.
- 3.3. When You complete a Contact us form:
 - 3.3.1. Your full name and surname;
 - 3.3.2. Your email address; and
 - 3.3.3. Your contact number.
- 3.4. We do not knowingly collect or Process any Special Personal Information nor do We knowingly collect or Process Personal Information of Children.

4. ACCURACY

- 4.1. You agree that any and all Personal Information that You provide to Us is accurate, full and up to date. In the event that Your Personal Information contains any errors or inaccuracies, You agree to indemnify and hold Us, Our officers, directors, employees, agents, contractors, licensors, and members harmless from and against any and all claims, damages, actions and liabilities including without limitation: loss of profits, direct, indirect, incidental, special, consequential or punitive damages arising out of Our reliance on such Personal Information.
- 4.2. You agree to let Us know immediately if You become aware that Your Personal Information has been provided to Us by another person without Your Consent or if You did not obtain Consent before providing a Third Party’s Personal Information to Us.

5. PROCESSING OF PERSONAL INFORMATION

- 5.1. We will only Process Your Personal Information, where:
 - 5.1.1. You have Consented to such Processing;
 - 5.1.2. The Processing is necessary to provide the Website to You;
 - 5.1.3. The Processing is necessary for compliance with Our legal obligations; and/or
 - 5.1.4. The Processing is necessary for Our legitimate interests or those of any Third-Party recipients that may receive Your Personal Information.

6. FURTHER PROCESSING OF PERSONAL INFORMATION

- 6.1. We expressly warrant that there is no further Processing of Your Personal Information collected when You visit Our Website. We do not sell, rent out or trade Your Personal Information.
- 6.2. In the event that We enter into a business transition (including the sale of Zella Tech Law, or the merger and acquisition of Zella Tech Law by another company which involves the sale of all or a portion of Our assets), Your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that such an acquirer may continue to Process Your Personal Information as set forth in this Privacy Policy. Where possible and required under Applicable Data Protection Laws, we will notify You of the identity of the new entity Processing Your Personal Information.
- 6.3. Other than the above, We do not further Process Your Personal Information without Your Consent unless We reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law

7. DISCLOSURE OF PERSONAL INFORMATION

- 7.1. We may disclose Your Personal Information to:
 - 7.1.1. Our Employees to enable Us to operate Our business;
 - 7.1.2. Our Employees to fulfil requests by You, and to otherwise provide information and Services to You; and
 - 7.1.3. Any organisation and/or individual who is Our partner in providing the Services for any authorised purpose with Your express Consent.
- 7.2. We may share De-identified Personal Information with Third Parties for certain reasons, including advertising, marketing, business development, research and/or other related purposes. Should we share Your Personal Information with Third Parties, it shall be in accordance with the provisions of this Privacy Policy and the Protection of Personal Information Act. Please note that the term 'share' includes the act of 'disclosing', 'transferring'; 'sending' or otherwise making Your Personal Information available or accessible to another person or entity.
- 7.3. We may further disclose Your Personal Information under the following circumstances:
 - 7.3.1. To comply with the law or with legal process;
 - 7.3.2. To protect and defend Our rights, equipment, facilities and other property;
 - 7.3.3. To protect us against misuse or unauthorised use of the Website;

- 7.4. We will not disclose Your Personal Information to any Third-Parties other than Our Operators who are authorised to Process Your Personal Information on Our behalf for various purposes which include without limitation, website hosting email delivery, auditing and other services. Any other disclosure of the Personal Information that You Provide to Us, may be done only in accordance with the provisions of the Protection of Personal Information Act, 2013.

8. OUR INFORMATION OFFICER AND YOUR RIGHTS

- 8.1. POPIA places a duty on Us to appoint an Information Officer.
- 8.2. The role of the Information Officer is filled by **Komeshni Patrick**. Her contact details are:
Email: **komeshni.patrick@zellatl.co.za**.
Contact Number: 011 100 7641 or 082 362 2822
- 8.3. Her duties under the Applicable Data Protection Laws are:
- 8.3.1. Liaising with You when You have a question about Your Personal Information;
- 8.3.2. Assisting You with any requests and enforcing Your rights in respect of Your Personal Information;
- 8.3.3. Making sure that We are compliant with the Protection of Personal Information Act, 2013 and that We Process Your Personal information in accordance with this Privacy Policy.
- 8.4. You may choose when You wish to provide Your Personal Information to Us. You also have the right to withdraw Your Consent. However, if You choose not to provide certain details, or if You withdraw Your Consent, Your experience with some, or all of the Website and/or Services, may be affected.
- 8.5. To the extent provided for in law, You have certain rights in respect of Your Personal Information. In particular:
- 8.5.1. **Withdrawal of Consent:** You may withdraw Your Consent at any time by sending a written request to Our Information Officer. Upon receiving notice that You have revoked Your Consent, We will stop using Your Personal Information within a reasonable time, which will vary depending on what Personal Information We have collected and for what purpose, and We will send You a confirmation email stating same.
- 8.5.2. **Access or obtain a Copy of Your Personal Information:** You have the right to examine any of Your Personal Information that We collect. Should You wish to examine the Personal Information We hold about You, or obtain a copy thereof, kindly send a written request to Our Information Officer by filing this [Form 1](#) and submitting it to our Information Officer at the details contained in 8.2. above. We may charge a nominal fee should You request any physical copies or Records in terms of the schedule of fees contained in this [here](#).
- 8.5.3. **Update, Modify, Rectify, Erase:** You may request Us to update, modify, rectify, or erase the Personal Information that We hold on You.
- 8.5.4. **Object:** You may object to the Processing of Your Personal Information or restrict or stop Us from using any of the Personal Information which We hold on You, including by withdrawing any

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Consent You have previously given to the Processing of such information. In this regard, You may email Our Information Officer. We will send You a confirmation email stating that We have ceased Processing Your Personal Information.

- 8.6. These rights are not absolute, and We therefore reserve the right to refuse any requests in terms of the above-mentioned rights, for any reason permitted under the Protection of Personal Information Act, 2013.
- 8.7. Furthermore, You also have the right to lodge a complaint with the South African Information Regulator through their [website](#).

9. SECURITY OF PERSONAL INFORMATION

- 9.1. We are committed to and will implement and maintain appropriate technical and organisational measures to safeguard any Personal Information provided to Us from accidental or unlawful destruction, loss or alteration, as well as the unauthorised disclosure of, or access to, Personal Information transmitted, stored or otherwise Processed.
- 9.2. We will review Our security Processes regularly and improve them when required. We will destroy or De-identify Personal Information once We no longer require it for the purposes mentioned herein, or as required by law.
- 9.3. NOTWITHSTANDING THE ABOVE, IT IS EMPHASISED THAT EVEN THOUGH WE HAVE TAKEN SIGNIFICANT STEPS TO PROTECT YOUR PERSONAL INFORMATION, YOU ACKNOWLEDGE AND UNDERSTAND THAT NO COMPANY, INCLUDING OURSELVES, CAN FULLY PROTECT AGAINST SECURITY RISKS ASSOCIATED WITH THE PROCESSING OF PERSONAL INFORMATION ONLINE.

10. RETENTION OF PERSONAL INFORMATION

- 10.1. We retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy, which may include without limitation, maintaining the performance of Our Website and making data-driven business decisions in respect of additional features and/or Service offerings We may display on Our Website. When determining how long to retain Personal Information, We consider the necessity of the Personal Information for the provision of the Website and/or relevant Services, as well as the requirements of other Third-Parties, applicable laws, regulations and legal obligations. We may also retain records to investigate or defend against potential legal claims.
- 10.2. When retention of the Personal Information is no longer necessary, Your Personal Information will either be permanently deleted or Aggregated for analytics purposes, which include but are not

limited to testing our information technology systems, research, data analysis, creating marketing and promotion models, and improving Our Services. Where the Personal Information is Aggregated, We will De-identify Your Personal Information.

11. CROSS BORDER TRANSFERS

- 11.1. We operate Our Services in the Republic of South Africa; however, Our Services cater to Data Subjects across the African continent, and it may be necessary to transfer Personal Information across international borders for Processing and storage in line with the POPIA and Our operational requirements. These transfers are necessary for the purposes outlined in clause 2.4 above, including providing Our Services, improving Our Service offerings, and complying with legal obligations. By using submitting your Personal Information to Us, You expressly Consent to the transfer of this Personal Information for Processing and/or storage in jurisdictions outside South Africa which may have data protection laws that differ in scope and that may be less stringent than the laws in South Africa.
- 11.2. Please note that Personal Information collected through Our Website is stored on GoDaddy servers, located in North America, Asia and Europe. By using Our Website, You hereby provide Us with Your express Consent to store Your Personal Information in these regions.
- 11.3. Where You choose to access the Services and/or the Website from locations outside the Republic of South Africa, You Consent to the collection, transmission, use, storage and Processing of Your Personal Information in accordance with local laws, regulations and rules in force in South Africa.
- 11.4. To facilitate lawful trans-border flows of Your Personal Information, We take reasonable steps to ensure Your Personal Information is handled securely. This is done by employing various safety mechanisms such as:
 - 11.4.1. Standard Contractual Clauses as approved by the relevant authorities in Your jurisdiction to ensure adequate protection for Your Personal Information.
 - 11.4.2. Adequacy Decision Making where We recognise jurisdiction deemed by the relevant authorities to provide adequate protection for Your Personal Information.
 - 11.4.3. Binding Corporate Rules, where applicable.
 - 11.4.4. Implementation of robust technical and organisational measures to protect Your Personal Information during international transfers, including encryption, access controls and regular security assessments to prevent unauthorised access, disclosure, alteration or destruction of Your Personal Information.

PART B - Applicable Data Protection Laws

Part B is applicable to Users who are citizens or resident in other jurisdictions in Africa.

1. APPLICABLE DATA PROTECTION LAWS DEFINITIONS

- 1.1. **"Anonymised"** shall mean the procedure of Processing Personal Data in such a way that it can no longer be attributed to a specific Data Subject without additional information in accordance with the provisions of Applicable Data Protection Laws so that there is no risk of re-identification.
- 1.2. **"Applicable Data Protection Laws"** shall mean all legislation, regulations or guidance notes in the applicable country, whether promulgated or in draft form, protecting the fundamental rights and freedoms of individuals or juristic persons in respect of their right to privacy and the Processing of Personal Data.
- 1.3. **"Applicable Data Protection Authority"** shall mean the regulatory body or bodies responsible for overseeing and enforcing the Applicable Data Protection Laws and safeguarding individuals' privacy rights in various jurisdictions where Our Users reside or are citizens of.
- 1.4. **"Child/Children"** shall mean a natural person who, under applicable data protection laws, is not legally capable of providing valid consent to the processing of their Personal Data without the involvement of a parent or legal guardian.
- 1.5. **"Controller"** shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
- 1.6. **"Consent"** shall mean any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her. The term **"Consent"** as used in this Privacy Policy shall hold the meaning ascribed to it in the Applicable Data Protection Laws, in the event of any conflict between such definitions, the definition most favourable to the protection of the Data Subject shall apply.
- 1.7. **"Data Protection Officer"** shall mean the individual designated by an organisation to oversee compliance with data protection obligations. For the purposes of this Policy, the Data Protection Officer is equivalent to the Information Officer as defined under Part A.
- 1.8. **"Personal Data"** shall mean any information that relates to an identified or identifiable person, whether natural or juristic as the case may be, which includes without limitation names, identification numbers, location data, online identifiers, and factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person as defined in the Applicable Data Protection Law in a specific jurisdiction.
- 1.9. **"Processor"** shall mean a natural or legal person, public authority, agency, or other body which Processes Personal Data on behalf of the Controller. The term **"Processor"** as used in this Privacy Policy shall be the specific term used and shall hold the meaning ascribed to it in the Applicable Data Protection Laws, in the event of any conflict between such definitions, the definition most favourable to the protection of the Data Subject shall apply.
- 1.10. **"Sensitive Data"** shall mean the category of Data that requires extra protection and handling due to its nature and the potential harm that may result from its unauthorised access or disclosure including without limitation, biometric Data, health information, religious and/or philosophical

beliefs, political opinions, sexual orientation, financial information and Data concerning criminal convictions and offenses.

2. PERSONAL DATA

- 2.1. The Website collects and Processes the Personal Data of the Users for the purposes listed in clause 2.4 of Part B of this Policy below.
- 2.2. It is the duty and responsibility of the Controller to direct the Users to the terms and conditions of this Privacy Policy.
- 2.3. Consent for Collection and Processing
 - 2.3.1. By accessing, visiting, or otherwise using Our Website, You agree to the terms and conditions of this Privacy Policy. You expressly Consent to the Processing of Your Personal Data in accordance with this Privacy Policy and the Applicable Data Protection Laws.
 - 2.3.2. When submitting a Third Party's Personal Data, You represent and warrant that You have obtained their express Consent beforehand.
 - 2.3.3. By visiting Our Website, You confirm that You are 18 years or older. Children are not permitted to access and use Our Website.
 - 2.3.4. You expressly Consent to Us keeping Your Personal Data once Your relationship with Us has been terminated for Aggregate, statistical or historical purposes. Such Personal Data will be Anonymized and cannot be used to identify You personally.
- 2.4. Purpose for Collection
 - 2.4.1. We use the Personal Data We collect from You for the reasons listed in clause 2.4 under Part A of this Privacy Policy.

3. WHAT WE COLLECT AND HOW

- 3.1. We may collect, Process, and retain certain Personal Data from You in connection with Your use of the Website through the methods listed under clause 3 in Part A of this Privacy Policy in order to provide You with Our Services.
- 3.2. We do not knowingly collect or Process Personal Data of Data Subjects under the age of 18 without the respective Data Subject's parent or legal guardian's Consent.

4. ACCURACY

- 4.1. You agree that all Personal Data provided to Us is accurate. If any errors or inaccuracies are found, You agree to indemnify and hold Us harmless from any resulting claims or damages arising out of Our reliance on such Personal Data.
- 4.2. You also agree to inform Us immediately in writing if your Personal Data is shared without Your Consent or if You share a Third Party's Personal Data without proper Consent.

5. PROCESSING OF PERSONAL DATA

- 5.1. We will only Process Your Personal Data on the following basis:
 - 5.1.1. **Consent** - You have provided Us with clear Consent to Process Your Personal Data by clicking "I Accept" or any other similar wording that signify Your Consent when presented with this Policy and the Terms of Use. Please note that such Consent may be withdrawn at any time by sending an email to Our Data Protection Officer, whose details are outlined in clause 11 below;
 - 5.1.2. **Contract** - The Processing of Your Personal Data is necessary to provide the Website and Our Services to You;
 - 5.1.3. **Legal obligations** - Processing of Your Personal Data is necessary to comply with Our legal obligations under the applicable legislation in Your jurisdiction; and
 - 5.1.4. **Legitimate Interest** - Processing of Your Personal Data is necessary for the protection of Our and/or Your legitimate interests which includes without limitation responding to Your queries or providing You with the Services.

6. DISCLOSURE OF PERSONAL DATA

- 6.1. We may disclose your Personal Data to the following natural and/or juristic persons:
 - 6.1.1. Our Employees who fulfil requests submitted by You, and to assist them to provide requested information, and/or technical support to You if You encounter any problems related to operating the Website and/or features thereof; and
 - 6.1.2. Our Administrator who manages Our Website.
- 6.2. We may share Anonymised Personal Data with Third Parties for business development and research purposes.
- 6.3. We may disclose Your Personal Data under the following circumstances:
 - 6.3.1. To comply with the law and associated legal processes;
 - 6.3.2. To protect and defend Our rights, equipment, facilities, and other property; and
 - 6.3.3. To protect Us against misuse or unauthorised use of the Website.
- 6.4. We will not disclose Your Personal Data to any Third-Parties other than Our Processors who are authorised to Process Your Personal Data on Our behalf. Any other disclosure of the Personal Data that You Provide to Us, may be done only in accordance with Applicable Data Protection Laws.

7. YOUR RIGHTS

- 7.1. The Applicable Data Protection Law may afford you the following rights in respect of Your Personal Data:
- 7.1.1. **Access** - You may request Us to access Your Personal Data held by Us;
 - 7.1.2. **Erasure** - You may request Us to delete Your Personal Data that is under Our control;
 - 7.1.3. **Inform** - You may request Us to inform You how Your Personal Data under Our control is being Processed, including the purposes for Processing, the categories of Personal Data being processed, and any Third Parties with whom the Personal Data may be shared with;
 - 7.1.4. **Object** - You may object to Us processing Your Personal Data;
 - 7.1.5. **Rectify**: You may request Us to rectify any errors in Your Personal Data under Our control;
 - 7.1.6. **Restrict**: You may request Us to restrict the use of Your Personal Data under Our control; and
 - 7.1.7. **Portability**: You may request Us to transfer Your Personal Data, where possible.
- 7.2. Please note that these rights are not guaranteed or absolute as data protection legislation varies from country to country. We therefore reserve the right to refuse any requests in terms of the above-mentioned rights, for any reason permitted under the Applicable Data Protection Laws.
- 7.3. In the event that You wish to enforce any of the above rights, You can submit a request by email to Our Data Protection Officer. Additionally, You may exercise Your right to lodge a complaint with the Data Protection Authority in Your jurisdiction.

8. SECURITY OF YOUR PERSONAL DATA

- 8.1. We warrant that we exercise our best endeavours to implement reasonable technical and organisational measures to protect Your Personal Data from unauthorised access, disclosure, alteration, or destruction.
- 8.2. NOTWITHSTANDING THE ABOVE, IT IS EMPHASISED THAT EVEN THOUGH WE HAVE TAKEN SIGNIFICANT STEPS TO PROTECT YOUR PERSONAL DATA, YOU ACKNOWLEDGE AND UNDERSTAND THAT NO COMPANY, INCLUDING OURSELVES, CAN FULLY PROTECT AGAINST SECURITY RISKS ASSOCIATED WITH THE PROCESSING OF PERSONAL INFORMATION ONLINE.

9. RETENTION OF YOUR PERSONAL DATA

- 9.1. We will retain Your Personal Data only for as long as necessary to fulfil the purposes for which it was collected or as required by law. We will securely delete or Anonymise Your Data when it is no longer needed.

10. TRANSBORDER FLOW OF YOUR PERSONAL DATA

- 10.1. We will transfer Your Personal Data across borders in accordance with clause 11 of Part A of this Policy.

11. FURTHER INFORMATION

- 11.1. For further information on Our privacy practices and Your rights under the Applicable Data Protection Laws, please contact Our Data Protection Officer.

PART C: GENERAL INFORMATION

1. USER ANALYTICS AND TRACKING

- 1.1. We collect Aggregated Website use information to measure the frequency of visits to Our Website, the average time spent on the Website and pages viewed.
- 1.2. We use this information to improve Our internal business Processes and better administer the Website. This is done through researching Our Users' habits, measuring Website traffic patterns, trends analysis, and gathering broad demographic information from Aggregated Website data. These insights allow Us to better understand how Our Website is used and how We can improve the User experience.
- 1.3. Particularly, We use Google Analytics tracking technology to collect this information for the purpose of tracking traffic to and understanding user interaction with Our Website. The information collected is kept confidential.
- 1.4. Kindly note that Google Analytics uses HTTP Cookies to "remember" what a User has done on previous pages or other interactions with the Website. These Cookies collect information and report site usage statistics and assist Us to improve Our Website's design and functionality. You can find more information on Google Analytics' use of Cookies [here](#). Additionally, You can find more information on Google Analytics' Privacy Policy [here](#).
- 1.5. Please note that internet browsers allow you to reject Cookies or any other tracking technologies by actively managing the settings on Your electronic device. However, if You choose not to allow certain Cookies through blocking or deleting them, or if You withdraw Your Consent, Your experience with some, or all of the Website features, may be affected.
- 1.6. Analytics and tracking information may be shared with Our Operators to such an extent as it is necessary for them to administer and improve Our Website on Our behalf.

2. THIRD PARTY WEBSITES - OUR SOCIAL MEDIA PAGES

- 2.1. This Website may include links to other websites, including Our Social Media Pages. These links are provided for Your convenience for the purposes of providing further information to You. Such links do not signify that Zella Tech Law endorses the website(s) linked to this Website. You agree that We shall have no responsibility or bear no liability in relation to the content of the linked website(s). Content hosted on Third-Party websites is the responsibility of those websites, and not of Zella Tech Law.
- 2.2. By accessing Third Party links, You agree that those Third-Party websites have their own methods of collecting and Processing Your Personal Information and/or Personal Data. You are encouraged to read the Privacy Policies of Third-Party websites, prior to submitting Personal Information and/or Personal Data on such websites.
- 2.3. If You engage in any interaction with Us on any of Our Social Media Pages, You agree and understand that:
 - 2.3.1. the Personal Information and/or Personal Data You submit by and through Our Social Media pages can be read, collected and/or used by other users of these websites subject to the privacy settings associated with Your social media account with the applicable Social Media website, and that it can be used to send You unsolicited messages or otherwise to contact You without Your Consent, and
 - 2.3.2. where We respond to any interaction on Our Social Media pages, Your social media account name and/or handle may be viewed by any and all of Our members which constitute Our social media presence.
- 2.4. You agree that We shall not be held responsible for the Personal Information and/or Personal Data that You choose to submit to Our Social Media pages. You understand that the Social Media websites are independently operated and that We are not responsible for such Social Media websites' interface, privacy or security practices.

3. OBJECTIONS, COMPLAINTS AND QUERIES

- 3.1. Should You feel that You would like to object to the collection, use or otherwise Processing of Your Personal Information and/or Personal Data, kindly complete **FORM 1**, and email it to Our Information Officer and/or Data Protection Officer.
- 3.2. Should You require a correction to be made to Your Personal Information and/or Personal Data that We keep on record, or You would like us to delete Your Personal Information and/or Personal Data, kindly complete **FORM 2** and email it to Our Information Officer and/or Data Privacy Officer.

For any other queries about this Policy, kindly contact Our Information Officer and/or Data Protection Officer.

- 3.3. We will endeavour to make the correction, cease Processing Your Personal Information and/or Personal Data, delete or De-identify/Anonymise Your Personal Information and/or Personal Data, in accordance with Your request. We will treat Your requests or complaints confidentially.
- 3.4. Should you require a copy of your Personal Information and/or Personal Data, such a request may be submitted to our Information Officer and/or Data Protection Officer. Kindly note that we may charge a fee for access to Records.

4. CHANGES TO THIS POLICY

- 4.1. We may change this Policy at any time, in which case any amended terms shall be effective immediately upon the posting of the revised Policy and any subsequent activity in relation to the Website shall be governed by such amended terms. We therefore recommend that You visit the Website and review this Policy regularly.