

# Privacy Policy

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## 2a. Google reCAPTCHA Privacy Policy

Thank you for visiting our website and your interest in data protection. Please read the following information to learn when we collect which personal data and how we use such data.

### 1. Entity Responsible (Controller)

The entity responsible (controller) according to Art. 4 Abs. 7 EU General Data Protection Regulation (GDPR) is

Colleen Wellen  
The Media Café  
Hillside Office Park, Block 211B  
Debe Street, Moreleta Park  
Pretoria  
0044

E-mail: [mediacafe@wol.co.za](mailto:mediacafe@wol.co.za)

### 2. Collection, Processing and Use of Personal Data

The legal bases of the collection, storage and processing of personal data can be found in particular in the Protection of Personal Information Act (or POPI Act).

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements and delivering services accordingly. For this purpose, we will collect contact details including your name and organisation.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

Personal data is information relating to an identified or identifiable natural person. This includes in particular names, address data, telephone numbers or e-mail addresses. However, information on preferences, memberships or e.g., previously visited websites may also constitute personal data.

### 3. Contact

If you contact us (e.g., via e-mail or our contact form), the data transmitted by you will be stored for the purpose of processing your enquiry as well as for possible processing of subsequent questions. We will delete the data accruing in this connection after storage is no longer necessary or we restrict the processing if there are statutory retention obligations.

### 4. Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

### 5. How we use your information

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

## 6. Your Rights

You have the following rights vis-à-vis us with regard to the personal data that concerns you:

- right of access,
- right to rectification or erasure,
- right to restriction of processing,
- right of objection against processing,
- right to data portability

Moreover, you have the right to complain to a data protection supervisory authority about the processing of your personal data by us.

## 7. Correction of your information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

## 8. Disclosure to Third Parties

We disclose your personal data to third parties insofar as this is required to fulfil contracts or to process payments. A disclosure of personal data to third parties for marketing or advertising purposes will not be made without your express consent.

## 9. Definition of personal information

According to the Act **“personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, COR Concepts also includes the following items as personal information:

- All addresses including residential, postal and email addresses.

- Change of name – for which we require copies of the marriage certificate or official change of name document issued by the state department.

## 10. Newsletter

Our newsletter regularly informs you about us and the latest news in the area of hygiene technology.

If you subscribe to our newsletter, we need a valid e-mail address. After entering your e-mail address and confirming the consent wording, you will receive an automated e-mail in which you once again confirm your consent by clicking a link (double opt-in). As proof of your consent, we store your e-mail address, the consent wording, the confirmation e-mail as well as the respective IP addresses, time and date of the registration and confirmation.

Our newsletters enable us to analyse the behaviour of newsletter recipients. Among other things, it can be analysed how many recipients have opened the newsletter message and how often which link was clicked in the newsletter. With the help of so-called conversion tracking, it can also be analysed whether a predefined action (e.g., purchase of a product on our website) has taken place after clicking on the link in the newsletter.

You can revoke your consent to receive the newsletter at any time by clicking on the unsubscribe link in any e-mail or by using the contact details provided above. The legality of the data processing operations that have already taken place remains unaffected by the revocation.

The data you have stored with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and deleted both from our. This does not affect data stored by us for other purposes (e.g., e-mail addresses of our customers in the customer database).

## 11. Server Log Files

Each time when our website is opened by a user, our hosting provider will store information in a log file. These log files contain information about retrieved data, status codes, time stamps and system information. The data is non-personal, it allows no conclusions to the specific person.

Apart from that, log files also store IP addresses. We cannot readily attribute these to a certain person.

If you would like to view our website, we collect the aforementioned data which is technically required for us in order to show you our website and to guarantee stability and safety.

## 12. Web Analysis with Google (Universal) Analytics

Our website uses Google (Universal) Analytics, a web analysis service of Google Inc. ([www.google.co.za](http://www.google.co.za)). Google (Universal) Analytics uses methods which enable an

analysis of how you use the website, such as so-called “cookies”, text files that are stored on your computer. The information generated about your use of this website will as a rule be transferred to a server of Google and stored there. By activating the IP anonymisation on this website, the IP address will be shortened prior to the. Only in exceptional cases will the full IP address be transferred to a server of Google and shortened there. The anonymised IP address transmitted by your browser within the framework of Google Analytics will not be combined by Google with other data.

We use Google Analytics in order to analyse and be able to regularly improve the use of our website. Through the statistics gained we can improve our offer and make it more interesting for you as the user. For the exceptional cases in which personal data will be transferred to Google, they subjected itself to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

You can prevent the capture of the data generated by the cookie and relating to your use of the website (incl. your IP address) as well as the processing of such data by Google if you download and install the browser plug-in available from the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

### 13. Integration of Google Maps

On this website we may use the offer of Google Maps. This means that we can show you interactive maps directly on the website and enable you to comfortably use the map function.

When you visit the website, Google receives the information that you opened the corresponding page of our website. Moreover, additional data, such as your IP address, will be transmitted to Google. This is made independently of whether Google provides a user account where you are logged in or whether you do not have a user account. If you are logged in with Google, your data will be directly attributed to your account. If you do not wish to have your data attributed to your Google profile, you have to log out prior to activating the button. Google stores your data as user profiles and uses it for purposes of advertising, market research and/or needs-based design of its website. Such an analysis is made in particular (even for users not logged in) to render needs-based advertising and in order to inform other users of the social network about your activities on our website. You have a right to object against the creation of such user profiles. To exercise this right, you have to contact Google.

Additional information about purpose and extent of the data collection and its processing by Google can be found in the privacy policies of Google. There you can also receive additional information about your rights in this respect and configuration options to protect your privacy: <https://policies.google.com/privacy?hl=en&gl=en>.

Google processes your personal data also in the USA and subjected itself to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

### 14. Google Web-Fonts

This page uses so-called web fonts provided by Google for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly.

For this purpose, the browser you are using must connect to Google's servers. This enables Google to know that your IP address has been used to access our website. The use of Google Web Fonts is in the interest of a uniform and appealing presentation of our online services. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

If your browser does not support web fonts, a standard font will be used by your computer.

Further information on Google Web Fonts can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy: "<https://www.google.com/policies/privacy/>"

## 15. Links to Other Websites

Our online offer may contain links to other websites. We have no influence on the operators of those websites adhering to the data protection regulations.

### 2a. Google reCAPTCHA Privacy Policy

Our primary goal is to ensure that our website is protected and secure for you and for us in the best possible way. In order to guarantee this, we use Google reCAPTCHA from Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). With reCAPTCHA, we can determine if you are a flesh and blood person and not a robot or other spam software. By spam we mean any unsolicited information that we receive electronically. With the classic CAPTCHAS, you usually had to solve text or image puzzles to check them. With reCAPTCHA from Google, we usually don't have to bother you with such puzzles. In most cases it is enough to simply tick the box and confirm that you are not a bot. With the new Invisible reCAPTCHA version you don't even have to set a checkmark anymore. You can find out exactly how this works, and, above all, which data is used for it in the course of this data protection declaration.

#### What is reCAPTCHA?

reCAPTCHA is a free captcha service from Google that protects websites from spam software and abuse by non-human visitors. This service is most commonly used when you fill out forms on the Internet. A captcha service is an automatic Turing test designed to ensure that an action on the Internet is performed by a human and not by a bot. In the classic Turing test (named after the computer scientist Alan Turing), a human being makes a distinction between a bot and a human being. With Captchas, this is also done by the computer or a software program. Classic captchas work with small tasks that are easy for humans to solve but have considerable difficulties for machines. With reCAPTCHA you don't have to actively solve any more puzzles. The tool uses modern risk techniques to distinguish people from bots. Here you only have to tick the text field "I am not a

robot” or with Invisible reCAPTCHA even this is no longer necessary. With reCAPTCHA a JavaScript element is integrated into the source code and then the tool runs in the background and analyses your user behaviour. From these user actions, the software calculates a so-called captcha score. Google uses this score to calculate how high the probability is that you are a human being even before captcha input. ReCAPTCHA or captchas in general are always used when bots could manipulate or abuse certain actions (e.g., registrations, surveys, etc.).

### Why do we use reCAPTCHA on our website?

We only want to welcome people of flesh and blood on our site. Bots or spam software of all kinds can stay at home. That’s why we do everything we can to protect ourselves and offer you the best possible usability. That’s why we use Google reCAPTCHA from Google. So we can be pretty sure that we will remain a “bot-free” website. By using reCAPTCHA, data is transmitted to Google, which uses Google to determine whether you are really a human being. reCAPTCHA therefore serves the security of our website and consequently also your security. For example, without reCAPTCHA it could happen that during registration a bot registers as many e-mail addresses as possible in order to subsequently “spam” forums or blogs with unwanted advertising content. With reCAPTCHA we can avoid such bot attacks.

### Which data is stored by reCAPTCHA?

ReCAPTCHA collects personal data from users in order to determine whether the actions on our website actually originate from humans. The IP address and other data required by Google for the reCAPTCHA service can therefore be sent to Google. IP addresses are almost always truncated before they land on a server in the U.S. within the member states of the EU or other signatory states to the European Economic Area Agreement. The IP address will not be combined with any other data held by Google unless you are signed into your Google Account while using reCAPTCHA. First, the reCAPTCHA algorithm checks whether Google cookies from other Google services (YouTube, Gmail, etc.) have already been placed on your browser. Then reCAPTCHA places an additional cookie in your browser and captures a snapshot of your browser window.

The following list of collected browser and user data is not exhaustive. Rather, they are examples of data which, according to our knowledge, are processed by Google.

- Referrer URL (the address of the page from which the visitor comes)
- IP address (e.g., 256.123.123.1)
- Information about the operating system (the software that allows you to run your computer). Known operating systems are Windows, Mac OS X or Linux.)
- Cookies (small text files that store data in your browser)
- Mouse and keyboard behaviour (every action you perform with the mouse or keyboard is saved)
- Date and language settings (which language or which date you have pre-set on your PC is saved)
- All JavaScript objects (JavaScript is a programming language that allows websites to adapt to the user. JavaScript objects can collect all possible data under one name.)

– Screen resolution (shows how many pixels the image consists of)

There's no doubt that Google uses and analyses this data before you click the "I'm not a robot" check mark. With the Invisible reCAPTCHA version even the ticking is omitted and the whole recognition process runs in the background. How much and which data Google stores exactly, you don't get to know from Google in detail.

The following cookies are used by reCAPTCHA: Here we refer to the reCAPTCHA demo version of Google at <https://www.google.com/recaptcha/api2/demo>. All these cookies require a unique identifier for tracking purposes. Here is a list of cookies that Google has set on the reCAPTCHA demo version:

Name: IDE

Expiry time: after one year

Use: This cookie is used by the company DoubleClick (also owned by Google) to register and report a user's actions on the website in connection with advertisements. In this way, the advertising effectiveness can be measured, and appropriate optimisation measures can be taken. IDE is stored in browsers under the domain doubleclick.net.

Example value: WqTUmlnmv\_qXyi\_DGNPLESKnRNrpgXoy1K-pAZtAkMbHI-231567678125

Name: 1P\_JAR

Expiry time: after one month

Use: This cookie collects website usage statistics and measures conversions. A conversion occurs, for example, when a user becomes a buyer. The cookie is also used to display relevant advertisements to users. The cookie can also be used to prevent a user from seeing the same ad more than once.

Example value: 2019-5-14-12

Name: ANID

Expiry time: after 9 months

Use: We could not get much information about this cookie. Google's Privacy Policy mentions the cookie in connection with "promotional cookies," such as "DSID," "FLC," "AID," "TAID. ANID is stored under the domain google.com.

Example value: U7j1v3dZa2315676781250xgZFmiqWppRWKOr

Name: CONSENT

Expiry time: after 19 years

Use: The cookie stores the status of a user's consent.

Use: The cookie stores the status of a user's consent to the use of different Google services. CONSENT also provides security to help verify users, prevent fraudulent logon information, and protect user information from unauthorized attacks.

Example value: YES+AT.de+20150628-20-0

Name: NID

Expiry time: after 6 months

Use: NID is used by Google to match ads to your Google search. The cookie helps Google "remember" your most frequently-entered searches or your past interaction with ads. You'll always get customized ads. The cookie contains a unique ID that Google uses to collect the user's personal preferences for advertising purposes.

Example value: 0WmuWqy231567678125zILzqV\_nmt3sDXwPeM5Q

Name: DV

Expiration time: after 10 minutes

Use: Once you have checked the "I am not a robot" box, this cookie will be set.



The cookie is used by Google Analytics for personalized advertising. DV collects information in anonymous form and is also used to make user choices.

Example value: gEAABBCjJMXcl0dSAAAANbqc231567678125

Note: This enumeration cannot claim to be complete, as experience has shown that Google changes the selection of its cookies time and again.

### How long and where is the data stored?

By inserting reCAPTCHA, data is transferred from you to the Google server. Where exactly this data is stored, Google, even after repeated requests, is not clear. Without having received confirmation from Google, it can be assumed that data such as mouse interaction, time spent on the website or language settings will be stored on the European or American Google servers. The IP address that your browser transmits to Google is generally not merged with other Google data from other Google services. However, if you are logged into your Google Account while using the reCAPTCHA plug-in, the data will be merged. This is subject to Google's different data protection regulations.

### How can I delete my data or prevent data storage?

If you do not want data about you and your behaviour to be transmitted to Google, you must completely log out of Google and delete all Google cookies before visiting our website or using the reCAPTCHA software. In principle, the data is automatically transmitted to Google as soon as you call up our site.