

Privacy Policy

clarity
by Investec

About this Privacy Policy

This Privacy Policy (“Policy”) sets out what the categories of personal information Clarity may collect from you when you visit the website and its associated microsite (the “Website”) as well as how Clarity processes that personal information. This Policy must be read in conjunction with our Data Protection Statement. If you have any questions about this Policy, please see contact details at the end of this page. Clarity may amend this Policy from time to time, so you should check this page from time to time to ensure that you are aware of any changes that have been made. If we make material changes to this Policy we will notify you by means of a prominent notice on the Website prior to the change becoming effective.

Information Clarity Collects from You

Personal information you volunteer or which we may infer

Any domain name information that we collect is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the Website, pages viewed. We use this information to measure the use of our Website and to improve its contents. However, additional services may be available if we have certain information about you.

We may collect the following information:

- A list of the products and services you express an interest in when you use the Website;
- Your name and contact information, including email address and company details which you may submit to us when you interact with the Website; and
- Information regarding your personal or professional interests, demographics, experiences with our products and contact preferences in order to provide you with further correspondence about our products and services.

If you do not provide the information we need, we may not be able to provide our services to you. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Policy and our Data Protection Statement.

We may intercept and monitor your communications

To the extent permissible by law, Clarity may implement systems designed to intercept and monitor your communications with Clarity’s Associates. As part of this process of intercepting and monitoring these communications, we may record such communications for disclosure on the basis set out in this Policy.

Personal information we collect automatically

When you use the Website, Clarity automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested.

We treat this data as non-personal information, except where we are compelled to do otherwise by law or legal authority.

Clarity only uses this data in aggregate form and we may provide this aggregate information to our partners about how our customers, collectively, use the Website, so that our partners may also understand how users make use of the Website.

Linking

We may link to other websites which are not within our control. Once you have left our Website, we are not responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement applicable to the third party's website in question.

Cookies

As we mentioned above, we use cookies on our Website. Cookies are files that store information on your hard drive or browser allowing our Website to recognise that you have visited it before. All information regarding cookies, and how Clarity uses them to enhance your experience on our Website can be found within our Cookie Policy.

What We Do With the Information

We use your information to provide you with a better service, and in particular for the following reasons:

- To provide you with services you have requested and notify you about important changes or developments to these services;
- To respond to your inquiries and/or complaints or process your requests in relation to your information;
- To follow up as part of our customer care procedures;
- To update our records about you;
- For internal record keeping;
- To contact you for market research purposes and/or administer offers to you;
- To improve our products and services;
- For fraud prevention and detection, and to comply with applicable laws and regulations;
- In relation to competitions and other promotions;
- To evaluate the effectiveness of our marketing and for research, training and statistical analysis with the aim of improving our services; and
- To make our Website easier for you to use and to provide you with access to certain parts of the Website.

Clarity processes your personal information for the purposes outlined above where:

- The processing of your personal information is necessary to perform a contract or enter into a contract with you;
- The processing of your personal information is necessary for us to comply with legal and regulatory obligations; or
- The processing is necessary to support our legitimate interests in managing our business (or those of a third party) provided such interests are not overridden by your interests and rights.

Your Right to Object –

Please note that you have a right to object to the processing of your personal information where that processing is carried out for our legitimate interests.

Where required by applicable law, where we send you direct marketing, we will obtain your consent for this, which you may withdraw at any time.

How Long do we Keep Your Information

We are required to ensure that your personal information is accurate and maintained in a secure environment for a period of time no longer than necessary for the purposes for which we are processing your personal information. We generally keep personal information collected via the Website in accordance with the timeframes set out in any relevant legislation which applies to the personal information provided to us. However, in some cases we may need to keep personal information for longer (e.g., where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or dealing with complaints, legal challenges or prospective litigation).

Sharing Your Information

We may disclose your personal information to the following third parties:

- Other companies in the Clarity group of companies;
- Selected third parties to provide us with services, including companies that provide us with technical support and assistance in respect of the Website, companies that provide backoffice services, companies that provide hosting services or, that track the Website's activities and analytics, and companies engaged to market and distribute Clarity products and/or services;
- Professional advisers, judicial, regulatory and law enforcement bodies; and
- a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise.

Accessing Your Personal Information

South Africa

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2 of 2000. Fees to obtain a copy or a description of personal information held about you are prescribed in terms of this Act. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Clarity, please review our Promotion of Access to Information Act Manual located at https://www.investec.com/en_za/legal/paia-promotion-of-access-to-information-act.html

Contact us

If you have any questions about our Policy or practices described in it, you should contact us as follows:

support@nowclarity.com