

# KELLY MANAGEMENT SERVICES CC



## MASTER PRIVACY POLICY

**Last Updated:** 17 August 2021 (Version 1.1)

### Privacy Policy

Please read this Privacy Policy carefully to understand how we handle your Personal Information. If you do not agree to this Privacy Policy, please do not use the Website and/or related Services.

### 1. INTRODUCTION

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- 1.1. Kelly Management Services CC is a close corporation duly registered in accordance with the laws of the Republic of South Africa and trades as Kelly Le Roux Consulting (“**KLR**” (“**we**”, “**us**”, “**our**”). Our company registration number is 1995/010145/23 and our registered office is 9 University Rd, Westville, KwaZulu-Natal, South Africa, 3629.
- 1.2. We strive to ensure that our use of the Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving your experience as a customer or employee of KLR.
- 1.3. This Privacy Policy is incorporated into our Terms and Conditions. All capitalized terms used but not defined in this Privacy Policy have the meanings assigned to them in the Terms and Conditions. Other defined terms used in this Policy are explained in **Annexure A**.
- 1.4. By providing us with your Personal Information, you:

- 1.4.1. agree to this Privacy Policy and authorise us to process such data as set out in this Policy; and
- 1.4.2. authorise KLR, our Associates and our Service Providers to Process your Personal Information for the purposes stated in this Privacy Policy.

## **2. CONTACT US**

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We have appointed an Information Officer responsible for overseeing questions concerning this Privacy Policy. You may contact our Information Officer, Mr Johan Borstlap, at johan@klr.co.za to discuss this Privacy Policy, your rights under data protection laws applicable to you, and to raise any complaints with us. Further contact information and contact forms are available in our PAIA Manual.

## **3. OUR SERVICES**

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- 3.1. We offer (among others) the following services (“**our Services**”):
  - 3.1.1. the sale and licensing of enterprise resource planning software systems and related information technology products and services such as:
    - (a) on-site and remote support;
    - (b) the sale and rental of IT related equipment; and
    - (c) the provision of solutions such as backups, cloud services, connectivity, development, communication, and hosted platforms.
  - 3.1.2. administration and management of technology systems and hosted platforms;
  - 3.1.3. general support and implementation concerning the above software and information technology systems and platforms.
- 3.2. We collect Personal Information about you when you:
  - 3.2.1. contract with us for our above Services;
  - 3.2.2. access our Website, applications or related software systems;
  - 3.2.3. contact us, or otherwise interact with us; and/or
  - 3.2.4. join KLR as an agent, sales associate, or employee.

## **4. WHO DOES THIS PRIVACY POLICY COVER**

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- 4.1. This Privacy Policy explains how we protect and use your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our Services, and our Website.

- 4.2. This Policy applies to all external parties with whom we interact, including but not limited to:
  - 4.2.1. Users of the Website and/or the Services;
  - 4.2.2. customers and potential customers;
  - 4.2.3. our suppliers, and contractors; and
  - 4.2.4. potential job applicants.
- 4.3. This Privacy Policy must be read together with our Website terms and conditions and any other documents, agreements or privacy notices that describe the manner in which we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand how KLR will process your Personal Information.
- 4.4. This Privacy Policy supplements such other documents and agreements, but shall not supersede them and in the event of a conflict, the terms of the particular document or agreement will prevail.

## 5. WHAT PERSONAL INFORMATION DO WE COLLECT?

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- 5.1. We may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Policy. When we perform one or more of these actions, we are "**Processing**" your Personal Information.
- 5.2. The Personal Information we collect may differ according to the Services you receive from KLR. We may process various categories of Personal Information as follows:
  - 5.2.1. **Identity Information**, when registering as a customer, including information concerning your name, company name, identity and registration numbers, title, date of birth, gender, and legal status, languages, physical address;
  - 5.2.2. **Contact Information**, which includes your billing address, service addresses, physical address, email address and telephone numbers;
  - 5.2.3. **Credit Information**, to assess our transactional risk, including credit history reports from credit bureaus (with your consent where required by law);
  - 5.2.4. **Criminal behaviour history**, where permitted in respect of prospective employees and job applicants;
  - 5.2.5. **Education / employment history**, where required for job application purposes;
  - 5.2.6. **Financial Information**, where permitted, including bank account details, and financial statements;

- 5.2.7. **Human Resources** in respect of our own employees, including leave records, job applications, medical aid information to administer employment contracts and comply with our legal obligations;
  - 5.2.8. **Instruction Details**, which includes details of customers instructing KLR to procure goods or services on their behalf, including Personal Information included in correspondence, documents, sales agreements or evidence materials that we process in the course of providing our Services;
  - 5.2.9. **Tax Information** where permitted, which includes IRP5 records, PAYE records and VAT registration numbers;
  - 5.2.10. **Technical Information**, which includes your internet protocol (IP) address, browser type and version, time zone setting and location, operating system and platform, on the devices you use to access our Website, products or Services.
  - 5.2.11. **Usage Information**, which includes information as to your access to and use of our Website, products and Services.
  - 5.2.12. **Marketing and Communications Information**, which includes your preferences in respect of receiving marketing information from us and your communication preferences.
- 5.3. We also process, collect, store and/or use aggregated data, which may include historical or statistical data ("**Aggregated Data**") for any purpose. Aggregated Data is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that can identify you, we will treat the combined data as Personal Information, which will be managed per this Privacy Policy.

## 6. SPECIAL PERSONAL INFORMATION

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Where we need to process your Special Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, and per applicable laws.

## 7. HOW WE COLLECT PERSONAL INFORMATION?

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- 7.1. You directly provide KLR with most of the Personal Information we process. We collect and process Personal Information in the following ways, namely:
  - 7.1.1. through direct or active interactions with you;
  - 7.1.2. through passive or automated collections;
  - 7.1.3. in the course of providing our Services to you or your organisation, including where you register as a customer to use any of our Services or you opt-in to receiving any direct marketing from us;
  - 7.1.4. in evaluating job applicants and onboarding Employees;

7.1.5. from third parties, where permitted.

## 7.2. **Direct or active collection**

7.2.1. We may require that you submit certain information to enable you to access portions of our Website, to make use of our Services, to facilitate the negotiation and conclusion of an agreement with us, or that is necessary for our compliance with our statutory, professional or regulatory obligations.

7.2.2. We also collect Personal Information when you communicate directly with us. For example:

- (a) Via email, meetings and telephone calls;
- (b) When you fill in forms or registers, or make a purchase order with us;
- (c) When you voluntarily complete a customer survey, provide feedback or ask for marketing information to be sent to you.

7.2.3. If you contact us, we reserve the right to retain a record of that correspondence or telephone call, which may include Personal Information.

7.2.4. The Personal Information we collect from you may include any of the categories listed in paragraph 5 above depending on what will be necessary to perform the Services.

## 7.3. **Passive (automated) collection**

7.3.1. We may passively collect certain categories of your Personal Information from the devices that you use to access and navigate our Website or to make use of our services (“Access Devices”) using server logs and your browser’s cookies.

7.3.2. The categories of Personal Information we passively collect from your Access Device may include your:

- a) Technical Information;
- b) Usage Information; and/or
- c) Any other Personal Information which you expressly permit us, from time to time, to passively collect from your Access Device.

## 7.4. **Indirect collection (from third parties)**

7.4.1. We may also receive your personal information indirectly from, among others, the following sources (including public parties):

- a) our information technology suppliers;
- b) from other Responsible Parties where we act as contracted outsourced processors (“**Operators**”) in performing our Services, including:

- Banks and other financial institutions;
  - Software and server suppliers;
  - Telecommunications providers;
  - Medical institutions and insurers, in the case of our employees;
- c) law enforcement;
- d) Credit bureaus (with your consent, where required by law).

7.4.2. When we collect your Personal Information from third parties it is either because you have given us express consent to do so, your consent was implied by your actions, or because you provided consent, either explicit or implicit, to the third party that provided this information to us.

## **8. WHY WE USE YOUR PERSONAL INFORMATION**

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### **8.1. Consent**

- Based on your consent, where required by law, we may process your contact data for marketing purposes.
- You may withdraw your consent at any time after giving it by clicking unsubscribe on the marketing communication received or by emailing our Information Officer.

### **8.2. Contract**

We process your Personal Data if it is necessary to enter into or perform under a contract that we have with you as a customer or to provide a solution to you as a customer. This includes:

- to provide customers with the Services, technical support and solutions they have requested;
- processing, collecting and administering payments for our Services rendered;
- to communicate with you about the Services, your use of the Services, or your inquiries related to the Services and send you communications on behalf of our Service Providers we use to carry out the Services to meet your needs.
- to respond to customer enquiries and complaints;
- to meet record-keeping obligations;
- to enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as to institute legal proceedings against a customer;
- transferring limited and necessary Personal Data to our contracted service providers (such as data centers) in performing our obligations to you;

- for security and identity verification, and to check the accuracy of customer Personal Data; and
- for any other related purposes.

### 8.3. **By law**

We process customer's Personal Data if the law requires or permits it. This includes:

- Verifying your identity to comply with legislative, regulatory, professional, risk and compliance requirements;
- to fulfil reporting requirements and data requests;
- to meet record-keeping obligations;
- for any other related purposes.

### 8.4. **Legitimate interests**

We process the Personal Data when it is necessary to pursue your legitimate interests and/or our legitimate interests. This includes:

- to detect, prevent, manage and protect against fraud, security breaches, misuse, and other prohibited or illegal activity, claims and other liabilities;
- maintaining the safety, security and integrity of our Website, our Services, products, databases, networks and other technology assets;
- to protect our rights in any litigation that may involve you;
- general due diligence and risk assessment;
- enforcing and defending other legal claims;
- to manage business continuity and emergencies;
- for analytics, to gather metrics to better understand how users/customers use the Services, and to evaluate and improve our Services; and
- for purposes otherwise described to you when collecting your information.

### 8.5. **Third-party collection**

- When we collect your Personal Data from third parties it is because such third parties have:
  - authorised or instructed us to do so; and
  - have represented to us (either express or implied) that:
    - (a) their instructions are lawful;
    - (b) they are permitted to disclose such Personal Data to us;

(c) they will, where required by law, obtain the necessary consents or justify the necessary legitimate interests pursued (*Sec 11(1)(d)&(f) of POPIA*), and provide all necessary data and privacy notices to you as a Data Subject.

- We use your Personal Data only for the purpose for which it was originally collected by the relevant Responsible Party and strictly following their instructions and authorisation.

- **Combined data**

For the purposes discussed in this Privacy Policy, we may combine the data that we collect through the Services with data that we receive from other sources, and use and share such combined data following this Privacy Policy.

- **Further processing limitation**

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you and our customers notice.

## **9. COMPULSORY PERSONAL INFORMATION AND CONSEQUENCES OF NOT SHARING WITH US**

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Where KLR is required to process certain Personal Information by law, or in terms of a contract that we have entered into with you, and you fail to provide such Personal Information when requested to do so, KLR may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, KLR may be required to terminate the contract and/or relationship with you, upon due notice to you, which termination shall be done in accordance with the terms of that contract and any applicable legislation.

## **10. WHEN AND WILL WE USE YOUR INFORMATION TO MAKE AN AUTOMATED DECISION ABOUT YOU**

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We do not use your Personal Information to make any automated decisions about you.

## **11. DISCLOSURE OF PERSONAL INFORMATION**

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- 11.1. We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission or in accordance with this Privacy Policy.

- 11.2. We may disclose your Personal Information to our contracted Responsible Parties, Service Providers and Associates for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality and appropriate data protection measures.
- 11.3. In addition, may disclose your Personal Information:
- 11.3.1. where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;
  - 11.3.2. With our contracted Service Providers and other Operators who process Personal Information on our behalf and whose assistance we require to conduct our business operations and that:
    - (a) have agreed to be bound by this Privacy Policy and our Data Protection Policy or by similar terms offering a similar level of protection;
    - (b) where such Personal Information is necessary for the performance of their obligations to or on behalf of KLR (i.e., records storage, payroll, server hosts); and
    - (c) based on our instructions, are not authorised by us to use or disclose the information except as strictly necessary to perform the services on our behalf as instructed or to comply with legal requirements.
  - 11.3.3. With third party Operators to the extent that they require such specific Personal Information in the provision of services for or to us, which include hosting, development and administration, technical support and other support services relating to our Website and/or the operation of KLR's business divisions. We will only authorise the processing of any Personal Information by a third-party Operator on our behalf by, among others, entering into agreements with those third parties governing our relationship with them and highlighting instructions, confidentiality, security and non-disclosure obligations.
  - 11.3.4. If required by law;
  - 11.3.5. to enable us to enforce, implement, or apply any other contract between you and us, or any contract where we act as an agent of the principal contracted with you;
  - 11.3.6. to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents, brokers or any other third party;
  - 11.3.7. to any relevant third party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including, but not limited to, in the event of a reorganization, dissolution or liquidation);

11.3.8. With governmental agencies, exchanges and other regulatory or self-regulatory bodies, if required to do so by law or there is a reasonable belief that such is necessary for:

- (a) compliance with the law or with any legal process;
- (b) the protection and defence of the rights, property or safety of KLR, our customers, employees, contractors, suppliers, services providers, agents, brokers or any third party;
- (c) the detection, prevention and management of actual or alleged fraud, security breaches, technical issues, or the misuse or unauthorized use of the Website and any other contravention of this Privacy Policy;
- (d) the protection of the rights, property or safety of members of the public (if you provide false or deceptive information or make misrepresentations, we may proactively disclose such information to appropriate regulatory bodies).

11.4. While providing our Services we may obtain, use, and disclose Personal Information about our customer's customers. In these instances, we process the Personal Information in accordance with this Privacy Policy unless specifically agreed otherwise with our customer.

## **12. STORAGE AND TRANSFER OF PERSONAL INFORMATION**

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12.1. We have engaged reputable and trusted organisations as outsourced processors (Operators), and in some cases, as sub-processors to provide data storage and cloud services to securely store your information. Our servers and cloud storage run in secure premises located in South Africa. Where our customers require the server hosting services located outside of South Africa, these servers are located within countries strictly regulated by the General Data Protection Regulation (GDPR) and maintain a high level of security measures.

12.2. We reserve the right to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected, or outside of South Africa in a jurisdiction that may not have comparable data protection legislation; Provided that if the location does not have substantially similar laws to those of South Africa, we will take reasonably practicable steps, including the imposing of suitable contractual terms and undertake a due diligence to ensure that your Personal Information is adequately protected in that jurisdiction.

## **13. SECURITY AND INTEGRITY**

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13.1. We will take appropriate and reasonable technical and organisational steps to protect all Personal Information held by us in line with industry best practices, including protection

against accidental or unlawful destruction, accidental loss or alteration, and unauthorised disclosure or access. This includes the following:

- keeping systems secure (such as monitoring access and usage);
- storing records securely;
- controlling the access to our premises, systems and records;
- safely destroying or deleting records;
- encrypting and/or password protecting sensitive data;
- protecting our servers using firewalls and limiting access to information on a strictly need to know basis;
- testing the security of our Website and IT systems regularly;
- When processing payment card details, our payment gateways comply with the applicable Payment Card Industry Data Security Standard (PCI-DSS standard);
- periodically reviewing our collection, storage and processing practices, including physical and digital security measures

13.2. **However, no data transmission over the internet or electronic/physical storage can be guaranteed to be 100% secure. As such, you acknowledge and accept that we cannot guarantee the security of your data transmitted to, through, or on our Services or via the Internet and that any such transmission is at your own risk.** However, we are subject to POPIA which we comply with.

13.3. We will notify you and the relevant regulatory authorities of any data breaches where we are legally required to do so and within the prescribed period.

13.4. Where we have given you (or where you have chosen) a password that enables you to access the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## 14. RETENTION AND DELETION

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14.1. We will only retain your Personal Data for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

14.2. The length of time for which we retain data depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

14.3. If there are no other lawful grounds for us to continue processing your Personal Data, we will destroy such data using secure methods.

## 15. MAINTENANCE, CORRECTIONS AND ACCESS

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- 15.1. Where we act as a Responsible Party, we are required to take all necessary steps to ensure that your Personal Data is accurate, complete, not misleading and up to date.
- 15.2. Anyone about whom we maintain Personal Data may request to inspect and, if appropriate, correct the Personal Data held by us. It is your responsibility to inform us, or the relevant Healthcare Practitioner/healthcare provider, should your Personal Data be incorrect, incomplete, misleading or out-of-date by contacting us. We may require additional data from the requesting party to confirm the legitimate basis for the request and the identity and authority of the requestor. Upon receipt and verification of the corrected Personal Data, we will adjust our data or records accordingly.
- 15.3. A request for correction/deletion of Personal Data or destruction/deletion of a record of Personal Data must be submitted using the prescribed Form 2 which is available on the Information Regulator's website.

## 16. DATA MINIMISATION

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- 16.1. We have service level agreements with third parties who send us Personal Information (either in our capacity as a Responsible Party or Operator). These state that only relevant and necessary information is to be provided as it relates to the processing activity we are carrying out.
- 16.2. We have destruction procedures in place where a data subject or third party provides us with Personal Information that is surplus to our requirements.

## 17. YOUR DATA PROTECTION RIGHTS

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- 17.1. Data protection laws may grant you with, among others, the following rights:
  - 17.1.1. **Request access to your Personal Information** – enabling you to receive a copy of the Personal Information retained about you;
  - 17.1.2. **Request the correction of your Personal Information** – to ensure any incomplete or inaccurate Personal Information is corrected;
  - 17.1.3. **Request erasure of your Personal Information** – where there is no lawful basis for the retention or continued processing of your Personal Information;

- 17.1.4. **Object to the processing of your Personal Information for a legitimate interest (or those of a third party)** - under certain conditions where you feel it impacts your fundamental rights and freedoms;
- 17.1.5. **Request restriction of processing of your Personal Information** – to restrict or suspend the processing of your Personal Information to limited circumstances;
- 17.1.6. **Withdraw consent given in respect of the processing of your Personal Information at any time** – withdrawal of consent will not affect the lawfulness of any processing carried out before your withdrawal notice. But may not affect the continued processing of your Personal Information in instances where your consent is not required.

17.2. If an above request/objection is to be made, please use the contact information at paragraph 2 above and we will revert within 30 calendar days.

## 18. DIRECT MARKETING

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- 18.1. KLR would like to send you information about our product and service offerings we believe may be of interest to you.
- 18.2. We may send marketing materials to our customers' email addresses (including individuals who enquire about our Services with or through us as permitted by POPIA, provided that:
  - your name and contact details were obtained in the context of the sale of our products or Services (including any inquiries, requests or bookings concerning our products and Services);
  - we contact you to market our similar products or Services.
  - you may opt-out at any time and free of charge on any of our marketing communications by clicking unsubscribe on any email sent to you or by emailing our information officer.
- 18.3. If you are not our customer, we may send marketing materials to where you give us your express "opt-in" consent (either digitally or in-person) to send you marketing materials through your preferred electronic channels of communication, provided that we shall keep a record of your consent and you may opt-out any time and free of charge on any of our subsequent marketing communications.

- 18.4. Once you have chosen to opt-out, we may send you written confirmation of receipt of your opt-out request (which may be in electronic form), and we will thereafter not send any further direct marketing communication to you. However, you may continue to receive communication from us on matters of a regulatory nature, which are not marketing related.

## 19. CHILDREN

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Our Website and our Services are not targeted at people under the age of 18. We will not knowingly collect Personal Information in respect of persons in this age group without express permission to do so, unless permitted by law.

## 20. THIRD PARTY SUB-PROCESSORS/OPERATORS

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- 20.1. We use external processors (“**Operators**”) for certain processing activities and to assist in the delivery of Services. We reserve the right to change our Operators at any time without further notice to you, but we will ensure our Operators are bound by this Privacy Policy and our Data Protection Policy or similar terms providing the same or higher level of protection. Such external processing activities include, but are not limited to:
- 20.1.1. IT systems and infrastructure;
  - 20.1.2. Debt collection services;
  - 20.1.3. Human resources;
  - 20.1.4. Payroll;
  - 20.1.5. Hosting and email infrastructure;
  - 20.1.6. Credit reference agencies;
  - 20.1.7. Server hosts and data centers;
  - 20.1.8. Direct marketing / mailing services.
- 20.2. We conduct due diligence procedures in respect of our external Operators prior to forming a business relationship. We obtain company documents and references to ensure the Operator is adequate, appropriate and effective for the task we employ them for.

## 21. COOKIES

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- 21.1. We may place small text files called “cookies” on your device when you visit our Website. Cookies do not contain Personal Information, but they do contain a personal identifier allowing us to associate your Personal Information with a certain device. Cookies serve useful purposes for you, including:
- 21.1.1. Remembering who you are as a user of our Website to remember any preferences you may have selected on our Website, such as saving your username and password, or settings (“**functional cookies**”);
  - 21.1.2. allowing our Website to perform its essential functions. Without these cookies, some parts of our Website would stop working (“**essential cookies**”);
  - 21.1.3. monitoring how our Website is performing, and how you interact with it to understand how to improve our website or Services (“**site analytics**”).
- 21.2. Your internet browser may accept cookies automatically and you can delete cookies manually. However, no longer accepting cookies or deleting them may prevent you from accessing certain aspects of our Website where cookies are necessary.
- 21.3. Many websites use cookies and more information is available at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 22. PRIVACY POLICIES OF OTHER WEBSITES

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- 22.1. Our Website may contain links to other websites, apps, tools, widgets and plug-ins that are run by third parties. If you visit a third-party website or social media site, you should read that website/ social media’s privacy notice, terms and conditions, and their other policies. We are not responsible for the policies and practices of third parties and social media sites. Any personal information you give to those organizations is dealt with under their privacy notice, terms and conditions, and other policies.
- 22.2. If **YOU** disclose your personal information **directly** to any third party other than KLR, **KLR SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF YOUR DISCLOSURE OF YOUR PERSONAL INFORMATION TO SUCH THIRD PARTIES.**

## **23. GOVERNING LAW**

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- 23.1. This Privacy Policy is governed by South African law.
- 23.2. If any provision of this Privacy Policy is determined to be illegal, void or unenforceable due to applicable law or by order of court, it shall be deemed to be deleted and the continuation in full force and effect of the remaining provisions shall not be prejudiced.

## **24. CHANGES TO THIS POLICY**

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We may amend this Privacy Policy from time-to-time and we will take reasonably practicable steps to inform you when changes are made. Without limiting the manner in which we may inform you, we may notify you by email, “pop-up” notification on our Website, or notification when you access our Website.

## **25. QUERIES, COMPLAINTS, AND INFORMATION REGULATOR**

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- 25.1. If you have any questions or complaints about your privacy rights or this Privacy Policy, please address your concerns to our Information Officer at [johan@klr.co.za](mailto:johan@klr.co.za). If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the South African Information Regulator through their website, <https://www.justice.gov.za/infoereg/>.
- 25.2. If you are located outside of South Africa, you may contact the appropriate regulatory authority in your country of domicile.

## ANNEXURE – DEFINITIONS

"Associates"	KLR's directors, employees and consultants of KLR or any of its subsidiaries.
"KLR" / "we" / "us" / "our"	Kelly Management Services CC trading as Kelly Le Roux Consulting.
"Operator"	any person or entity that Processes Personal Information on behalf of a Responsible Party.
"Personal Information"	<p>information or data relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to information relating to -</p> <ul style="list-style-type: none"> <li>• education or the medical, financial, criminal or employment history of the person;</li> <li>• any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>• the biometric information of the person.</li> </ul>
"Responsible Party"	the entity that decides how and why Personal Information is Processed. Responsible Parties may instruct Operators to processes Personal Information on their behalf
"Service Provider"	third party providers of various services with whom KLR engages, including, but not limited to, software licensors, developers and suppliers of software, and related products, providers of information technology, communication, file storage, data storage, copying, printing, distribution/logistics, accounting or auditing services, counsel, investigators, attorneys, and employee provident/pension fund administrators, and our insurers and professional advisors.
"Special Personal Information"	Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, or any other information that may be deemed to be sensitive under applicable law.