



Turtle Life Support cc, Postnet Suite 014, Private Bag X 1037, Germiston, 1400

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## Privacy Policy

Revision 1.2 (06112019)

### 1. INTRODUCTION

Turtle Life Support cc recognises the importance of protecting the personal information that you (“the User”) provide to us. Therefore, we have put together, and endeavour to follow, this policy that respects and addresses that.

### 2. INFORMATION COLLECTION

2.1 Turtle Life Support cc collects information from the User at several different points on the Site. Turtle Life Support cc is the sole owner of the information collected on the Turtle Life Support cc web site (“the Site”). We will not sell, share, or rent this information to others in ways different from what is disclosed in this statement.

2.2 Consent to collect information can be express (e.g. signing an agreement) or implied (e.g. if the User is given an opportunity to opt-out of a specific form of information sharing, but chooses not to do so, Turtle Life Support cc implies that the User chooses to share this information with us).

### 3. INFORMATION WE COLLECT

In the course of service provision to the User we may collect certain forms of information. The types of information that we may collect are detailed below:

- **Information you provide** – When you register for an account on Turtle Life Support cc by completing the appropriate form, we ask you for personal information (such as your name, email address and phone number). We may combine the information you submit under your account with information from other services or third parties in order to provide you with a better experience and to improve the quality of our service.
- **Financial Information** – In the course of providing a service to you, Turtle Life Support cc may ask for financial information (Bank account details, credit card details etc.). Such information will be treated with the utmost privacy, will be stored encrypted on our systems, will only be communicated across a secure link and will not be provided to any third parties except where necessary to provide the Turtle Life Support cc service to you.
- **Cookies** – When you visit the Turtle Life Support cc website, we may send one or more cookies – a small file containing a string of characters – to your computer that uniquely identifies your browser. We use cookies to improve the quality of our service by storing user preferences or storing session information. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, this is not advised as some features (and indeed our service itself) may not function correctly if your cookies are disabled.



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- **Log information** – When you use Turtle Life Support cc, our server automatically records information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** – When you send email or other communication to Turtle Life Support cc, we may retain those communications in order to process your enquiries, respond to your requests and improve our services.
- **Links** – Turtle Life Support cc may present links in a format that enables us to keep track of whether these links have been followed and who followed them, either on the web site or in electronic communications. We use this information to improve the quality of our service, customized content and advertising.
- **Other sites** – This Privacy Policy only applies to Turtle Life Support cc. We do not exercise control over any third-party sites who we have partnered with to deliver a service to you. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you, over which Turtle Life Support cc has no control.

#### 4. HOW THIS INFORMATION IS USED

4.1 Turtle Life Support cc collects user information for the purposes described below:

- Providing a service to our users, including the display of customized content and advertising
- Auditing, research and analysis in order to maintain, protect and improve our service
- Ensuring the technical functioning of our equipment and resources
- Developing new services

4.2 While mostly this information will be used to provide a service to our users, it may also be used to provide our own services.

4.3 We will not collect or use sensitive information for purposes other than those described in this Privacy Policy unless we have obtained your prior consent.

#### 5. COMMUNICATIONS

5.1 Turtle Life Support cc may send the User, site and service announcement updates on an irregular basis. Users are not able to unsubscribe from service announcements, which contain important information about our service.

5.2 On occasion Turtle Life Support cc will email newsletters to provide the User with information that we think the User will find useful, including information about new products and services. We might also contact the User by email to see if the User is interested in participating in market research regarding Turtle Life Support cc. We may also contact the User by email to respond to customer-service complaints that the User has submitted, to address a



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problem affecting the User's use of the service or to verify the User's account information if the User submits a password request.

## 6. INFORMATION SHARING

6.1 Turtle Life Support cc may share aggregate demographic information with our advertisers or information collection companies, but will not reveal any personally identifiable information in these instances. These companies do not retain, share, store or use personally identifiable information for any secondary purposes. We may also partner with third parties to provide specific services. When the User signs up for these services, we will share the information that is necessary for the third party to provide these services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.

6.2 Turtle Life Support cc may share a User's contact information with other registered Users for the purposes of resolving support queries relating to Turtle Life Support cc or the service provided to a User by another User. This contact information includes, but is not limited to, name, surname, email address and phone number. Typically, this would be providing a buyer's contact details to a seller or vice versa, where Turtle Life Support cc has the necessary information to assist, but cannot actually resolve a support query.

6.3 We will not voluntarily disclose any information about individual users, except as described in this Privacy Policy, or to comply with applicable laws or valid legal process, or to protect the rights or property of Turtle Life Support cc or others, to assist our email vendor with resolving complaints about unsolicited email, or as otherwise described in this Privacy Policy.

## 7. DATA INTEGRITY

Turtle Life Support cc processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary and possible.

## 8. INFORMATION SECURITY

8.1 We take appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data. The servers that we store personally identifiable information on are kept in a secure environment.

8.2 We restrict access to personal information to Turtle Life Support cc employees who need to know that information in order to operate, develop or improve our services.



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## 9. ACQUISITION OR MERGER

It is possible that Turtle Life Support cc and/or any of our assets may be acquired in an acquisition or a merger. In such a transaction, customer information may be transferred to the acquiring entity. While we will endeavour to require the successor company to maintain this Privacy Policy, we cannot guarantee that this policy will remain in effect after such a corporate action.

## 10. NOTIFICATION OF CHANGES

10.1 This policy may be revised over time as new features are added to the Web site and/or as changes are required due to changing circumstances. We will post our new Privacy Policy, along with the date of its last revision, prominently so that the User will always know what information we gather, how we might use that information, and whether we will disclose it to anyone.

10.2 Turtle Life Support cc is, however, under no obligation to inform the User of such changes when they happen, although it is assumed that any changes will be minor and will not fundamentally impact the User. Should the change be deemed by Turtle Life Support cc to be significant, we will endeavour to inform the User of these changes through whatever means we deem necessary (banner on home page, email notification etc.) in a timely manner.

## 11. CONTACT INFORMATION

If the User has any questions about this Privacy Statement or about Turtle Life Support cc online learning management system, please contact us at [admin@tls.za.com](mailto:admin@tls.za.com).

12.1 The terms “The User” and “User” are used interchangeably and refer to all individuals and/or entities accessing this web site for any reason whatsoever.

12.2 The terms “we” and “Turtle Life Support cc” are used interchangeably and refer to Turtle Life Support cc itself and all individuals and/or entities acting directly on behalf of Turtle Life Support cc.