



VirtualEye Privacy Policy

Interpretation, Definitions and Legal References

Interpretation

Words with capitalised initial letters have meanings specified under the following conditions.

The provided definitions maintain the same significance whether presented in singular or plural form.

Definitions and Legal references

In the context of this Privacy Policy:

- **This Website (or this Application):** <https://virtualeye.co.za/> or any website or application from time to time.
- **You :** The person who accesses or utilises the Service, or the organisation or legal entity that the individual represents while accessing or using the Service, as applicable.
- **Company :** The entity (referred to as either "the Company," "We," "Us," or "Our" in this Agreement) is identified as Virtual Eye located at 71 Generaal Hertzog, Dan Pienaar, Bloemfontein, 9301
- **Affiliate :** An entity that has control over, is controlled by, or is under common control with another party. In this context, "control" implies ownership of 50% or more of the shares, equity interest, or other securities that carry voting rights for the election of directors or other managing authorities.
- **Account :** A distinct user account established for your access to our Service or specific sections of our Service.
- **Service :** The services provided by this Website as described in these Terms and on this Website.
- **Country :** Republic of South Africa.
- **Service Provider :** Any individual or legal entity processing data on behalf of the Company. This term encompasses third-party entities or individuals engaged by the Company to support, deliver, or perform services related to the Service, or aid the Company in analysing Service usage.
- **Personal Data :** Any information about an individual, both natural and juristic entities (people and companies), from which that entity can be identified. It does not include information where the identity has been removed (anonymous data).
- **Cookies :** A cookie is a string of information that a website stores on a visitor's computer, mobile Device or any other Device, including information about Your browsing history on the website as one of its various functions.
- **Device :** Any tool capable of accessing the Service, such as a computer, cellphone, or digital tablet.

At VirtualEye we adhere to the highest standards of protecting your Personal Data when we process it by virtue of your use of our Services or our Website or any related platforms, or by providing us with your Personal Data in any other way. As such, we have created this privacy policy for you to read and to understand how we safeguard your Personal Data and respect your privacy ("**Privacy Policy**").



Not all terms are necessarily defined in order or may be defined in our Terms of Use ("**Terms**").

Please ensure that you read all the provisions below, and our policies and guidelines which may apply from time to time, to understand all of your, and our, rights and duties.

Important Information and Who We Are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your Personal Data through any form of your engagement with us. This Privacy Policy complies with, and facilitates the obligations required from, the South African Protection of Personal Data Act, No. 4 of 2013 ("**POPIA**"), as amended.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are fully aware of how and why we are using your Personal Data. This Privacy Policy supplements the other notices and is not intended to override them.

Responsible Party and Operator

VirtualEye is the "Responsible Party" and is responsible for your Personal Data when we decide the processing operations of your Personal Data. In certain instances, we operate as an "Operator" of Personal Data on behalf of a Responsible Party who use our services. In that case, that Responsible Party's privacy policy will apply to your use of their services.

We have appointed an information officer at VirtualEye who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our information officer using the details set out below.

Our Contact Details

- Legal entity: VirtualEye
- Information Officer: Riaan Venter
- Email address: <https://virtualeye.co.za/>
- Postal address: 71 Generaal Hertzog, Dan Pienaar, Bloemfontein, 9301
- Telephone number: +27 (0) 87 086 3332

You have the right to make a complaint at any time to the South African regulator's office (Information Regulator's Office of South Africa). We would, however, appreciate the chance to deal with your concerns before you approach any such regulator, so please contact us in the first instance.

What Personal Data is collected?

Types of Data Collected

We may collect, use, store, and transfer ("**process**") different kinds of Personal Data about you which we have grouped together as follows:

Identity Data including full name or the information about your company such as company name, address and/or company registration details.



Contact Data including email address and contact numbers.

Account Data including all information in your Website account available through the Services.

Financial Data including bank account details, third-party payment provider information and payment card details (which we do not store but is processed by our payment service provider).

Social Media Data including all information available on your public social media profile including posts, stories, likes and comments.

Marketing and Communications Data including messages sent to us, your preferences in receiving notices and marketing from us and our third parties and your communication preferences as well as details of which communications were sent to you and how they were sent.

Transaction Data including details about payments to and from you, contracts, contractual terms, contract fees, signups, subscriptions, invoices and other details of products and services you have obtained from us or provide to us.

Usage Data

Usage Data is automatically gathered during your use of the Service. This may encompass details such as your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the specific pages you visit on our Service, the date and time of your visit, the duration spent on those pages, unique Device identifiers, and additional diagnostic data.

When you connect to the Service via a mobile Device, we may automatically collect certain information, including, but not limited to, the kind of mobile Device you utilise, your mobile Device's unique ID, your mobile Device's IP address, your mobile operating system, the type of mobile Internet browser you use, unique Device identifiers, and other diagnostic data.

Moreover, we may gather information that your browser transmits whenever you visit our Service, whether through a traditional browser or a mobile Device.

Tracking Technologies and Cookies

We utilise Cookies and similar tracking technologies to monitor activity on Our Service and store specific information. The tracking technologies employed include beacons, tags, and scripts, serving to collect and track data, as well as enhance and analyse Our Service. The technologies in use may involve :

- **Cookies or Browser Cookies** : These are small files placed on your Device. You can instruct your browser to reject all Cookies or notify You when a Cookie is being sent. However, if You decline Cookies, certain parts of Our Service may become inaccessible. Unless You adjust your browser settings to refuse Cookies, Our Service may use them.
- **Web Beacons** : Certain sections of Our Service and Our emails may contain small electronic files referred to as web beacons (also known as, pixel tags, clear gifs and single-pixel gifs). These files enable the Company, for instance, to tally users who have visited specific pages or opened an email, and they contribute to other pertinent website statistics (such as tracking the popularity of a particular section and verifying system and server integrity).
- **Flash Cookies** : Some features of Our Service may employ locally stored objects (Flash Cookies) to gather and store information about Your preferences or activity on Our Service. Note that Flash Cookies are managed separately from the browser settings used for Browser Cookies. For details on deleting Flash Cookies, [refer to the information available at Adobe's guide](#).



There are two types of cookies: “Persistent” and “Session” Cookies. Persistent Cookies persist on your personal computer or mobile Device even when you go offline, whereas Session Cookies are deleted when you close your web browser. We employ both Session and Persistent Cookies for the following purposes:

- **Necessary / Essential Cookies :**

Type : Session Cookies

Essential for providing services on the website and enabling specific features. These Cookies authenticate users and prevent fraudulent use of user accounts. Without them, requested services cannot be provided, and they are used solely for service provision.

- **Cookies Policy / Notice Acceptance Cookies :**

Type : Persistent Cookies

Purpose : Identify if users have accepted the use of cookies on the website.

- **Functionality Cookies :**

Type: Persistent Cookies

Purpose : Remember choices made on the website, such as login details or language preference, to enhance user experience and eliminate the need to re-enter preferences.

- **Tracking and Performance Cookies :**

Type : Persistent Cookies

Administered by : Third-Parties

Purpose : Used to track information about website traffic and user interactions. The collected information may indirectly identify individual visitors and is associated with a pseudonymous identifier linked to the accessing Device. Additionally, these Cookies may be used to test new pages, features, or functionality.

- **Targeting and Advertising Cookies :**

Type : Persistent Cookies

Administered by : Third-Parties

Purpose : Track browsing habits to display advertising likely to be of interest. These Cookies use browsing history to group users with similar interests. With permission, third-party advertisers place Cookies to show relevant adverts on third-party websites.

For more details about the cookies we use and your choices concerning cookies, please refer to our Cookies Policy.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may have to cancel your access to our Website or provision of our Services as we will not be in a position to provide our services to you, but we will notify you if this is the case at the time.



How Is Your Personal Data Collected?

We use different methods to collect Personal Data from and about you, including through:

Direct interactions: You may give us your Personal Data by using our Service, or by corresponding with us through the Website, by email or otherwise. This includes Personal Data you provide when you:

- use our Service;
- use our Website;
- contract with us;
- provide any services to us as a service provider or independent contractor on contract with us;
- request information to be sent to you;
- give us some feedback.

Automated technologies or interactions: As you interact with our Website, we may automatically collect Usage Data about your equipment, browsing actions and patterns. We may collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Usage Data about you if you visit other websites employing our cookies.

Third parties: We may receive Personal Data about you from various third parties such as:

- merchants on the website;
- rewards partners;
- analytics providers;
- marketing platforms;
- search information providers; and
- payment service providers.

How does the Website Collect Personal Data?

We will process Personal Data when the law allows us to, for legitimate business reasons, and/or with your express and informed consent. We will therefore process Personal Data under the following legal bases:

- where we have your **express consent** to do so;
- where we need to consult with you or **perform on the Services contract** we are about to enter into or have entered into with you;
- where it is necessary for our **legitimate business interests** (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- where we need to comply with a **legal or regulatory obligation**.

Why does the Website Process Personal Data?

VirtualEye may process Personal Data for the following purposes :

- **To Provide and Maintain Our Service:** Monitor the usage of our Service.
- **To Manage Your Account:** Manage your registration as a user, providing access to various Service functionalities.



- **For the Performance of a Contract:** Develop, comply with, and fulfil contracts for products, items, or services.
- **To Use Service Providers:** To provide it to our authorised service providers who need your Personal Data to provide their services to you (such as our payment gateway and other software service providers we use to provide our services);
- **To Contact You:** Utilise email, telephone calls, SMS, or other electronic communication forms for updates, security notifications, and informative communications related to Service functionalities, products, or contracted services.
- **To Process Payments:** to process and service your payment for any services rendered by Virtual Eye or our service providers and to manage payments, fees, and charges for our Service.
- **To Provide News, Special Offers, and General Information:** Deliver information about goods, services, and events similar to those you've purchased or inquired about, unless you opt out.
- **To Manage Your Requests:** Attend and manage your requests.
- **To Deliver Targeted Advertising:** Develop and display tailored content and advertising, working with third-party vendors, and measuring effectiveness.
- **For Business Transfers:** Evaluate or conduct mergers, sales, restructuring, or other transfers of assets, including Personal Data in such transactions.
- **Legal Compliance:** Meet our regulatory and compliance requirements.
- **For Other Purposes:** Utilise information for data analysis, identifying usage trends, evaluating promotional campaign effectiveness, and enhancing Service, products, services, marketing, and user experience.

We may also use your Personal Data for other reasons such as for commercial purposes as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage. We will not use your Personal Data for different, unrelated, or incompatible purposes without notifying you.

Disclosure of Your Personal Data

We may have to share your Personal Data with the parties set out below for the purposes set out above.

Business Transactions:

If the Company is engaged in a merger, acquisition, or asset sale, your Personal Data may be transferred. Notice will be provided before your Personal Data is transferred and subjected to a different Privacy Policy.

With Service Providers:

Share Personal Data for Service monitoring, advertisement display, and payment processing.

With Affiliates:

VirtualEye has entered into and will continue to enter into partnerships and other affiliations with a number of vendors. Such vendors may have access to certain Personal Data on a need to know the basis for evaluating Users for service eligibility.

With Business Partners:

Share information with business partners for offering specific products, services, or promotions.

**With Other Users:**

Information shared in public areas may be viewed and distributed by all users. Interactions on third-party social media services may be visible to contacts on those platforms.

Law Enforcement:

Under specific circumstances, the Company may need to disclose your Personal Data as required by law or in response to valid requests from public authorities, such as a court or government agency.

Other Legal Requirements:

The Company may disclose your Personal Data in good faith, believing that such action is necessary to comply with a legal obligation, protect and defend the rights or property of the Company, prevent or investigate possible wrongdoing in connection with the service, protect the personal safety of users of the service or the public, and protect against legal liability.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data in accordance with our instructions and standards.

Security of Your Personal Data

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed by implementing reasonable, technical, and organisational measures in line with best industry practice. We also limit access to your Personal Data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your Personal Data on our instruction and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and the Information Regulator of a breach where we are legally required to do so.

While the security of your Personal Data is a priority for us, it's important to note that no method of transmission over the Internet or electronic storage is 100% secure. Although we strive to use commercially acceptable means to safeguard your Personal Data, we cannot guarantee its absolute security.

Retention of Your Personal Data

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

Personal Data collected for the purposes of the our legitimate business interests shall be retained as long as needed to fulfil such purposes.

We may be allowed to retain Personal Data for a longer period whenever we receive your consent to such processing, as long as such consent is not withdrawn. Furthermore, we may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

We will also preserve Usage Data for internal analysis purposes. Typically, Usage Data is retained for a shorter duration, unless its retention is essential for enhancing security, improving the functionality of our Service, or complying with legal obligations that necessitate the prolonged retention of such data.



Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

International Transfer of Your Personal Data

Your Personal Data, is processed at our operational offices and other locations involved in the processing. This implies that the information might be transferred to and maintained on computers located outside your state, province, country, or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction. Your agreement to this Privacy Policy, coupled with your submission of such information, signifies your consent to this transfer.

The Company is committed to taking all reasonable steps to ensure that your data is handled securely and in accordance with this Privacy Policy. No transfer of your Personal Data will occur to an organisation or country unless adequate controls, including the security of your data and other Personal Data, are in place.

How is Personal Data stored and Secured

Personal Data collected by VirtualEye is securely stored and is not accessible to third parties or employees of VirtualEye except for use as indicated above.

All of our employees are familiar with our security policy and practices. The Personal Data of our Users is only accessible to a limited number of qualified employees who are given a password in order to gain access to the information. We audit our security systems and processes on a regular basis. Sensitive information, such as credit card numbers or social security numbers, is protected by encryption protocols, in place to protect information sent over the Internet. While we take commercially reasonable measures to maintain a secure site, electronic communications and databases are subject to errors, tampering, and break-ins, and we cannot guarantee or warrant that such events will not take place and we will not be liable to Users for any such occurrences.

Marketing and How to Opt Out

We strive to provide you with choices regarding how we use your Personal Data, particularly around marketing and advertising. To manifest your rights attached to any marketing sent to you as an existing client, please use the in-built prompts provided on those communications, or contact us.

You will receive marketing communications from us if you have requested our Service, requested information from us, or provided us with your details in any other circumstance and, in each case, have not opted-out of receiving that marketing.

Users may opt out of receiving unsolicited information from or being contacted by us and/or our vendors and affiliated agencies by responding to emails as instructed, or by either :

- Calling us at +27 (0) 87 086 3332; or
- Emailing us at info@virtualeye.co.za.

How to correct any inaccuracies in Personal Data

You may contact us to update your Personal Data or to correct any inaccuracies by emailing us directly at info@virtualeye.co.za.

We also provide Users with a mechanism to delete/deactivate Personal Data from the Website's database. However, because of backups and records of deletions, it may be impossible to delete a User's entry without retaining some residual information. An individual



who requests to have Personal Data deactivated will have this information functionally deleted, and we will not sell, transfer, or use Personal Data relating to that individual in any way moving forward.

User rights

You have rights in relation to your Personal Data. Please contact us to find out more about, or manifest, these rights:

- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to object to processing
- The right to data portability
- The right to complain to a supervisory authority
- The right to withdraw consent

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Users with citizenships from jurisdictions other than South Africa, please note that we comply with South African data protection laws when processing your Personal Data as we are a South African entity. Should foreign law be applicable to your use of the services and/or the Website in any way, including how we may process your Personal Data, please contact us and we will gladly engage with you on your rights.

Changes to this Privacy Policy

This Privacy Policy was last updated on 06 June 2025 and previous versions are archived and can be provided on request.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

This Privacy Policy is subject to change without notice and is updated or amended from time to time and will be effective once we upload the amended version to the Website. Your continued access or use of our Services constitutes your acceptance of this Privacy Policy, as amended. It is your responsibility to read this document periodically to ensure you are aware of any changes.

Links to other websites



The Website contains links to other websites. Please note that when you click on one of these links, you are moving to another website. We encourage you to read the privacy statements of these linked sites as their privacy policies may differ from ours.