





Telephone: 087 222 8304 Email: info@lucotfo.co.za Web: www.lucotfo.co.za



36 Bronkhorstspruit St, Norkem Park, Kempton Park, Johannesburg



# Better Buildings

Reg. No.: 2004/077516/23

VAT: 4680243609



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#### **LUCOTFO PRIVACY POLICY**

Last Update: 01 January 2021

"User" a person who uses and/or access computer Software and/or material via the www.lucotfo.co.za website;

"www.lucotfo.co.za" This Website, its sponsors, affiliates and creators;

"Data" means any data (including Personal Information) provided to www.lucotfo.co.za by a User or given concent from a third party;

"Personal Information" Including but not limited any Data or information about an identifiable User, including an email address;

### **INTRODUCTION**

In this agreement unless it appears to the contrary, the singular shall include the plural and vice versa, any reference to any gender shall also includes the opposite gender and any reference to a natural person, shall include legal person and vice versa. This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when interacting with our website or dealing with Lucotfo and its employees to provide and/or fulfil a service or product offering.

We use your personal data to provide and improve our service. By using our services, you agree to the collection and use of information in accordance with this Privacy Policy.

We respect your privacy and your personal information, and for this reason we will take all reasonable measures, in accordance with this Policy, to protect your personal information to keep it confidential, even when you are no longer directly involved with Lucotfo at a given time.

By submitting your Personal Information to Lucotfo, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this website, you acknowledge that you have reviewed the terms of this Privacy Policy to the use of Personal Information and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If a User does not wish to submit any personal identifying information, the User should not submit any information within submission form fields on and <a href="https://www.lucotfo.co.za">www.lucotfo.co.za</a>.



This Privacy Policy forms part of our website Terms & Conditions, and such shall be governed by and construed in accordance with the laws of the Republic of South Africa. We will maintain the confidentiality of your personal information and comply with the Protection of Personal Information, Act 4 of 2013 (POPIA) when processing your personal information.

#### Who we are

Lucotfo Trading CC (Trading as: Lucotfo) is a Construction Company specialising in various aspects in Particular Solar Installations. Lucotfo sells its products to individuals and businesses supplied by its registered suppliers. Lucotfo is an online business and has a physical office from which customers can visit yet we have no store stock at our registered address. All orders must be placed through the website or via our sales department which can be reached via email at info@Lucotfo.co.za.

CPIC Registration: 2004 / 077516 / 23 Website address: https://Lucotfo.co.za

Registered address: 36 Bronkhorstspruit Str. Norkem Park, Kempton Park, 1618

#### **PERSONAL DATA**

Personal data refers to any information that identifies you or specifically relates to you. This includes, but is not limited to, the following information about you:

First name, Middle name, Last name, Physical address, Postal address, Email address, Telephone and/or cell number, Gender, Online identifiers such as social media profiles, User-generated content, documents and other content you submit to us or to our website, Any information about what you buy, where you shop, where you bank, and all related information will also be regarded as personal data.

In short, any information that we know about you will be regarded as your personal data. When personal information is collected, Lucotfo will indicate, where possible, the purpose for the collection and whether the information required is compulsory or voluntary.

Special Information is personal information that is not limited to demographic and contact information that could include, but is not limited to the below:

Expressed personal interests (example: Solar products products, Electrical equipment, etc), Personal preferences relating to a product or service.

When special information is collected, Lucotfo will indicate, where possible, the purpose for the collection and whether the information required is compulsory or voluntary.





#### **USAGE OF DATA**

Usage Data may include information such as your device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the website by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our website or when you access the website by or through a mobile device.

How we process your information

It is an optional condition of a User submitting Data to www.lucotfo.co.za that Users agree to receive future Promotional messages from www.lucotfo.co.za by Email and/or SMS or to Opt-out from future communications. A User can choose to opt-out of promotional messages at any time by contacting us at www.lucotfo.co.za or following the unsubscribe link or instructions on the future communication. We will only process your personal information for lawful purposes related to our business if the following circumstances apply:

You have consented thereto.

A person legally authorised by you, the law or a court, has consented thereto.

It is necessary to conclude or perform under a service or contract we have with you.

The law requires or permits it.

It is required to protect or pursue your legitimate interest, ours, or that of a third party; and

You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you, to support our contractual relationship with you. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.





Reasons for processing your information.

We will use your Personal and Non-personal Information only for the purposes for which it was collected or agreed with you. We will process your personal information for any of the following possible reasons:

To complete transactions on our website; To complete transactions with our sales representatives; To fulfil customer support enquiries; To process payments with on the website or directly when instructed to do so; To conduct market or customer satisfaction research or for statistical analysis; To evaluate the use of the site, products and services; To assist with business development; To suggest products or services (including those of relevant third parties) which we think may be of interest to you; To collect Usage Data and link this to your Personal Information so as to ensure that the site presents the best web experience for you; To evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you have visited it before and what site referred you to it;

To carry out our obligations arising from any orders or contracts entered into between you and us;

To confirm and verify your identity or to verify that you are an authorised customer for security purposes;

To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or enqured about a product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws; To notify you about changes to our service; To respond to your queries or comments; For audit and record-keeping purposes; In connection with legal proceedings.

To enable you to participate in and make use of value-added products and services; or For any other related purposes.

#### **DATA SECURITY**

Lucotfo will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. The company will store all the personal information in secured environments. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

## Our security policies and procedures cover:

Acceptable usage of personal information, special information and usage data; Access to personal information, special information and usage data; Computer and network security; Governance and regulatory issues; Investigating and reacting to security incidents.

Monitoring access and usage of personal information; Physical security; Retention and disposal of information; Secure communications; Security in contracting out activities or functions.

Lucotfo has physical, technological, and procedural security safeguards in place and will use its best endeavours to protect your personal information. <a href="www.lucotfo.co.za">www.lucotfo.co.za</a> is hosted on <a href="www.wix.com">www.wix.com</a>. They provide us with the online e-commerce platform that allows us to sell our products and services to you.





Your data is stored through www.wix.com's data storage, databases and the general www.wix.com application. They store your data on a secure server behind a firewall.

#### **EDITING OR REMOVING DATA.**

You can request to review your personal information contained in Lucotfo's records at any time to correct or update the information. If the purpose for which your personal information was requested initially does not exist anymore, for example you no longer have a contract with us, you may request information held by the company to be removed. However, Lucotfo can decline your request to delete the information from its records if other legislation requires the continued retention thereof or if it has been de-identified. Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy. User updates or removal will reflect in www.lucotfo.co.za's active database, but www.lucotfo.co.za may retain Data in backup files and archives or to prevent a User from being accidentally re-added to the database after they have expressly unsubscribed.

#### **SECURE STORAGE OF DATA**

Lucotfo will retain your personal information and data in compliance with the POPI Act and in compliance with other applicable legislation. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies

Information collected by www.lucotfo.co.za is stored in a secure operating environment that is not available to the public.

All Data is available only to the User and those authorized employees to whom www.lucotfo.co.za has granted permissions by issuing a username and password.

It is the responsibility of each User to maintain the confidentiality and security of their password and to alert www.lucotfo.co.za or reset their password if compromise of security is suspected.

Any unauthorised use of and www.lucotfo.co.za systems and attempts to access Data without express authorisation is a violation of the Agreement, the act of which is prosecutable by Law.





#### SHARING YOUR INFORMATION

Lucotfo will only share your personal information with third parties if you have consented to such disclosure. If consent has been obtained, Lucotfo may share your personal information with persons or organisations within and outside of Lucotfo.

Lucotfo may be obliged to disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of its members, for example, fraud prevention or to give effect to an agreement. Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent.

The customer further agrees to Lucotfo storing, processing and using the customer's personal information for, inter alia, the following purposes:

Marketing Lucotfo and Lucotfo's affiliates' current and future products to the customer from time to time;

#### CHILDREN'S PRIVACY

www.lucotfo.co.za does not have any motive or intention to gather contact Data of visitors who are under the age of 13 and would prefer that parental Data be supplied instead on behalf of a child under the age of 13.. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If Lucotfo becomes aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we will take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.





#### THIRD-PARTY TRACKING AND LINKS

Lucotfo uses Cookies and similar tracking technologies on https://Lucotfo.co.za to track the activity on our website and store certain information. Tracking technologies used could include cookies, beacons, tags, and scripts to collect and track information and to improve and analyze our service and offering.

<u>www.lucotfo.co.za</u> may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We do not exercise control over affiliate parties' privacy policies (personal information and third parties). Because we are not responsible for any representations, information, warranties or content on any website of an affiliate party (including websites linked to this website or websites facilitated by us), we do not exercise control over affiliate parties' privacy policies, and you should refer to the privacy policy of any such affiliate party to see how such party protects your privacy.

### Third-Parties access to your personal information

Where Lucotfo discloses personal information to intermediaries, other institutions, insurers, suppliers, manufacturers or any other third parties, the third parties will be obliged to use that personal information only for the reasons and purposes it was disclosed for.

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.

#### **LIMITATION**

www.lucotfo.co.za has no control over information or privacy policies of 3rd party websites hyperlinked to and from www.lucotfo.co.za. These 3rd party links are being provided for the convenience of the Users of www.lucotfo.co.za and www.lucotfo.co.za does not endorse and is not responsible or liable for the content, nature or reliability of any linked website or any link contained in a linked website. www.lucotfo.co.za takes no responsibility for monitoring, updating, supplementing or correcting any information on any linked website and makes no representation or warranties regarding such information. Please be aware that in linking to these outside websites, Users are leaving www.lucotfo.co.za and that www.lucotfo.co.za is not responsible for the content of any other site.



#### RIGHT TO OBJECT AND COMPLAIN

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of Personal Information as referred to in section 11(3) of the POPI Act.

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA).

The IRSA contact details are:

https://www.justice.gov.za/inforeg/contact.html
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
PO Box 31533, Braamfontein, Johannesburg, 2017
Email: inforeg@justice.gov.za

### **GOVERNANCE**

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Privacy Policy, we both submit to the jurisdiction of the South African courts.

#### **CHANGES TO PRIVACY POLICY**

We reserve the right, in our sole discretion to amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time.

You agree to review the Privacy Policy whenever you visit this website for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof. At our discretion we will inform you via email and/or a prominent notice on our website, prior to any significant changes becoming effective.

Any questions or concerns related to should be directed to the info@lucotfo.co.zaa.







# **CONTACT US**



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