

# Privacy Policy

Spinavita respects consumers' constitutional rights to privacy and data protection. Accordingly, Spinavita believes in protecting the personal information we collect from you when you use the Spinavita website ("our website"). Spinavita will use its best commercial endeavours to only use or disclose your personal information in the manner stated in this policy.

## 1. Personal information

Personal information refers to all information about you as an identifiable individual, including your name, address, e mail address, telephone number, and identity number.

## 2. Personal information collected

2.1. Limited personal information is collected using cookies. A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website. It enables our own system to recognize you when you visit our website again and to improve our service to you. Cookies may also be used to compile aggregate information about areas of our website that are visited most frequently. This information can be used to enhance the content of our website and make your use of it easier. We do not monitor which pages you looked at while visiting our website. You can disable our use of cookies by configuring your browser accordingly.

2.2. In order to register for certain services or to enter competitions or promotions offered through our website Spinavita will from time to time ask you for relevant personal information. Spinavita will use such information to provide the services to you. Spinavita may also use such information for its own internal purposes including:

- establishing and verifying your identity;
- maintaining and updating our customer databases;
- marketing, product research and development purposes.

### 3. Storage of personal information

Spinavita uses all reasonable measures to put in place and maintain electronic procedures and systems to ensure accuracy and to prevent unauthorized access to your personal information with reference to accepted technological standards.

### 4. Cookie Policy

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

### 5. Personal information shared

5.1. Spinavita will not sell, rent or otherwise disclose your personal information to any third party without your consent, provided that by using our website and/or subscribing for any of our services, you provide your express and informed consent for Spinavita to disclose your personal information to third parties as follows:

- to third party companies employed by Spinavita to provide services for us, including for example, website hosting and development. These companies require access to your personal information to perform their functions and not for any other purposes;
- to transfer Spinavita customer database/s, including personal information contained therein, to any third party who acquires all or substantially all of the assets or shares in our company or our website service whether by sale, merger, acquisition or otherwise.

5.2. Spinavita reserves the right to share non-personal, non-individual information in aggregate form with third parties for business purposes, for example with advertisers on our website or business associates and partners. This does not involve disclosing any personal information which can identify any individual consumer in any way.

## 6. Legal disclaimer

6.1. We reserve the right to disclose your personally identifiable information to governmental bodies, exchanges and other regulatory or self-regulatory organizations if Spinavita is required to do so by law or if we believe that such action is necessary as set out above.

6.2. In addition, we may disclose information if required to do so to any regulatory authorities in connection with any investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose Spinavita to legal liability.

## 7. Links

Our website contains links to other websites. Please note that we are not responsible for the privacy practices of third party websites or the manner in which they use cookies and advise you to read the privacy statements of each website you visit which collects personal information.

## 8. Communicating with us

It is very important that the information that Spinavita has about you is accurate and current. If you would like to receive a copy of the information we hold about you (subject to our right to charge you a fee to cover our expenses in this regard), to correct or update your information, or to ask any questions about this privacy policy, please contact us.

## 9. Electronic communications

The user consents to the website's agreements, notices and disclosures by visiting the website and receiving electronic information or communication by electronic means and this indicates that any legal requirements has been satisfied.

## 10. Changes to this privacy policy

10.1. We reserve the right to modify this policy at any time, so please review it frequently.

10.2. If we decide to change our privacy & security policy, we will post changes to this page. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page. The amended privacy & security policy will supersede and replace any previous policies with effect from the date on which it is posted on our website.

## 11. Contact us

If you have any questions or suggestions regarding our privacy & security policy, please email us at [info@spinavita.co.za](mailto:info@spinavita.co.za)