

## **GREENFIRE ENVIRO PRIVACY POLICY**

Greenfire Enviro services, including (without limitation) our website and other interactive properties through which the services are delivered (collectively, the “Service”) are owned, operated and distributed by Greenfire Enviro (referred to in this Privacy Notice as “GFE” or “we” and through similar words such as “us,” “our,” etc.). This Privacy Notice outlines the personal information that GFE may collect, how GFE uses and safeguards that information, and with whom we may share it.

GFE encourages our customers, visitors, business associates, and other interested parties to read this Privacy Notice, which applies to all users. By using our Service or submitting personal information to GFE by any other means, you acknowledge that you understand and agree to be bound by this Privacy Notice, and agree that GFE may collect, process, transfer, use, and disclose your personal information as described in this Notice. Further, by accessing any part of the Service, you are agreeing to THE TERMS AND CONDITIONS OF OUR TERMS OF SERVICE (the “Terms of Service”). IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE OR OUR TERMS OF SERVICE, PLEASE DO NOT USE ANY OF THE SERVICES.

Personal information (also commonly known as personally identifiable information (PII) or personal data) is information that can be used to identify you, or any other individual to whom the information may relate.

### **1. What personal information is collected by GFE and why?**

#### **a) Clients**

The personal information that we **collect directly from clients**, includes the following categories:

- Name and contact information (e.g. address; phone number; email);
- Geographic or location information
- Billing Information (e.g.bank account, billing contact information)
- Other information that may be exchanged in the course of engaging with the Service. You will be aware of any subsequently collected information because it will come directly from you.

When providing personal information to GFE as described in this Notice, that personal information is collected directly from you, and you will know the precise personal information being collected by us. When GFE is appointed by you, you agree that we may provide any of the described categories of personal information to GFE employees, consultants, affiliates or other businesses or persons for the purpose of processing such information on our behalf as required to perform the duties of Environmental Impact Assessment or any other service we may provide. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Notice.

Subject to the terms of this Privacy Notice, GFE uses the above-described categories of personal information in several ways. Unless otherwise stated specifically, the above information may be used for any of the following purposes:

- to administer the Service to you;
- to respond to your requests;
- to distribute communications relevant to your use of the Service, such as public participation or information about your use of the Service;
- as may be necessary to support the operation of the Service, such as for billing, account maintenance, and record-keeping purposes;
- **Please note that “opting out” of use of your personal information or receiving these communications will hamper service delivery and may result in termination of the services agreement or contract.**

We may invite you to post content on the Service, including your comments and any other information that you would like to be available on the Service, which may become public (“User Generated Content”). If you post User Generated Content, all of the information that you post will be available to authorized personnel of GFE. You expressly acknowledge and agree that we may access in real-time, record and store archives of any User Generated Content on our servers to make use of them in connection with the Service. If you submit a review, recommendation, endorsement, or other User Generated Content through the Service, or through other websites including Facebook, Instagram, Google, Yelp, and other similar channels, we may share that review, recommendation, endorsement or content publicly on the Service.

We will not share your personal information with other, third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature which you will specifically be able to **opt-out of**.

In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) to enforce any provision of the Terms of Service, protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare; (iii) when disclosure is required to maintain the security and integrity of the Service, or to protect any user’s security or the security of other persons, consistent with applicable laws (iv) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (v) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

#### **b) Interested and Affected Parties (I&APs)**

The Public Participation Process is a key requirement of any Environmental Assessment under the National Environmental Management Act (Act 107 of 1998). For this purpose, information is collected from or on interested and affected parties.

The personal information that we collect from or on interested and affected parties includes the following categories:

- Name and contact information (e.g., address; phone number; email);
- Geographic or location information
- Information contained in comments you make in any public participation process.

- Other information that may be exchanged while engaging with GFE. You will be aware of any subsequently collected information because it will come directly from you.

GFE does collect personal information (Name, property details, address, phone number, email) through third parties such as neighbours, Municipalities, Deeds Offices or other sources for the purpose of public participation for a specific project. This will occur when you have been identified as either an affected neighbour, or otherwise affected person and it is in your interest to be contacted. Else registering as an interested and/or affected party may be voluntary, in which case it is mandatory to provide us with the personal information stated above. Submitting comments is voluntary.

Limited information of interested and affected parties (name and geographic or location information or other information with relevance to the project and comments submitted) become part of public documents made available for comment. However, further contact details are made available to decision-making authorities.

In rare cases, information may be shared with other Environmental Assessment Practitioners at a fee, for their use in a public participation process.

In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) to enforce any provision of the Terms of Service , protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare; (iii) when disclosure is required to maintain the security and integrity of the Service, or to protect any user's security or the security of other persons, consistent with applicable laws (iv) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (v) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

## **1. Direct Communications**

We may communicate with you using email, WhatsApp, SMS, and other channels (sometimes through automated means) as part of our effort to administer or improve our products or services, or for other reasons stated in this Privacy Notice. You have an opportunity to withdraw consent to receive such direct communications, as permitted by law.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by submitting a request through the media of communication (usually email) or by using the UNSUBSCRIBE link (if available) in email communication you may have received.

Further, you may express your communication preferences by:

- Noting your preferences at the time you register with the GFE;
- Contacting us using the contact information provided;
- Logging into your account settings and updating your preferences (if relevant);

## **2. General**

### **a) Retention of Data**

GFE will retain your personal information only for as long as is necessary for the purposes set out in this Notice. We will retain and use personal information 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.

GFE will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Sites and/or Portals, or we are legally obligated to retain this data for longer periods.

## **b) Cookies, Device Data, and How it is Used**

When you use our Service, we may record unique identifiers associated with your device (such as the device ID and IP address), your activity within the Service, and your network location. GFE uses aggregated information (such as anonymous user usage information, cookies, IP addresses, browser type, clickstream information, etc.) to improve the quality and design of the Service and to create new features, promotions, functionality, and services by storing, tracking, and analyzing user preferences and trends. Specifically, we may automatically collect the following information about your use of Service through cookies, web beacons, and other technologies:

- domain name
- browser type and operating system
- web pages you view
- links you click
- IP address
- the length of time you visit the Sites, Portals, and/or Services
- the referring URL or the webpage that led you to the Sites

We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party service providers may do so on behalf of us).

In addition, we may use "cookies," clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Service, and the portion of the Service you choose to use. A cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site. Your browser has options to accept, reject or provide you with notice when a cookie is sent. Our cookies can only be read by GFE they do not execute any code or virus; and **they do not contain any personal information**. Cookies allow GFE to serve you better and more efficiently, and to personalize your experience with the Service. We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Service, and to deliver content (which may include third party advertisements) specific to your interests.

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online

campaigns or analyze visitor activity on the Service. We may permit these service providers to use cookies and other technologies to perform these services for GFE. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

### **c) Data Transfer**

We may use third party service providers (e.g. mailer applications) to help us deliver certain services, and it may result in the processing of personal information in data centers and locations outside of the Country. For example, these service providers may provide us with essential information technology or tools we use to run our business. We may permit these service providers to process our business information and/or your personal information. We do not permit these service providers to process any personal information outside of a contract, and these service providers may collect personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

### **d) South African Privacy Rights**

If you are a South African resident, South Africa law may provide you with certain rights with regard to your personal information under the Protection of Personal Information Act (“POPIA”) and Promotion of Access to Information Act (“PAIA”), as well as the Consumer Protection Act. Throughout this Privacy Notice you will find information required by POPIA regarding the categories of personal information collected from you; the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of the Notice and is applicable in the 12 months preceding the effective date of the Notice.

As a South African resident, the POPIA and PAIA provide you the ability to make inquiries regarding your personal information. Specifically, the degree to which the information is not already provided in this Privacy Notice, you have the right to request disclosure or action your personal information (within the requirements of public participation as regulated under the National Environmental Management Act, Act 107 of 1998), including:

- If your personal information is collected by us.
- The specific pieces of personal information collected about you.
- The ability to correct or delete certain personal information collected about you.
- The ability to delete all the personal information collected about you, subject to certain exceptions.
- To opt-in or opt-out of direct marketing to you.
- To object to processing of your personal information, or
- Appeal any rejection of access to your personal information

You may submit a request regarding your rights under POPIA or PAIA by submitting a request through the contact form or by contacting us at one of the following:  
desiree@greenfireenviro.co.za.

If we receive a POPIA request from you, we will first make a determination regarding the applicability of the law, and we will then take steps to verify your identity prior to responding.

The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information submitted in the request with information already held by GFE and/or contacting you through previously used channels to confirm that you submitted the request (i.e. confirming identity through contact information that we have on file, and/or the contact information submitted to make the request).

The GFE does not knowingly collect or process the special personal information such as your religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, health or sex life, or your criminal behavior or biometric information, unless it bears relevance to the enhancement of the public participation process for a specific project.

If you have a comment, question, or complaint about how we are processing your personal information, we hope that you contact us at [desiree@greenfireenviro.co.za](mailto:desiree@greenfireenviro.co.za) in order to allow us to resolve the matter. In addition, if you are located in the Republic of South Africa, you may submit a complaint regarding the processing of your personal information to the Information Regulator at the following link: <https://www.justice.gov.za/infoereg/contact.html>.

#### **e) Third Party Advertisers**

We do not allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Service.

#### **f) Information Storage and Security**

We employ industry-standard and/or generally accepted security measures designed to secure the integrity and confidentiality of all information submitted through the Service. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.

Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Service. In order to protect you and your information, we may suspend your use of any of the Service, without notice, pending an investigation, if any breach of security is suspected.

#### **g) External Links**

Our Service may contain links to websites maintained by clients. Please be aware that we exercise no control over linked sites and GFE is not responsible for the privacy practices or the content of such sites. Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.

You hereby acknowledge and agree that GFE is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party sites, and you hereby release GFE from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

## **h) Children's Privacy**

The Service is not intended for children under the age of 18, and GFE does not knowingly collect the personal information of children under the age of 18.

## **i) Changes to this Privacy Notice**

GFE reserves the right to modify this Privacy Notice from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Privacy Notice, GFE will post the revised Notice on our website. This Privacy Notice was last modified as of 13 July 2021.

## **3. Contact Us**

If you have any questions or comments about this Privacy Notice or the Service provided by GFE, please contact us at: 17 Mountain Road, Glenbarrie George 6529, 0829223180 or [desiree@greenfireenviro.co.za](mailto:desiree@greenfireenviro.co.za) .