



### 1. INTRODUCTION AND QM EASY'S ROLE

- 1.1 QM Easy, is owned and managed by Syncflo (Pty) Ltd ("Syncflo") (registration number: [2021 / 629672 / 07)), which is a private company with limited liability duly incorporated under the company laws of the Republic of South Africa. QM Easy provides an online platform designed to simplify Quality Management Systems (QMS) for school-based educators in South Africa. Protecting your personal information is of utmost importance to us, and this Privacy Policy outlines how we safeguard your data and respect your privacy ("Policy").
- 1.2 Syncflo is committed to adhering to the highest standards of data protection, complying with the South African Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), and any other applicable laws.
- 1.3 If you have questions about this Policy or how your personal information is processed by QM Easy, please contact us at <a href="https://hellowsyncflo.co.za">hello@syncflo.co.za</a>
- 1.4 In some circumstances, Syncflo operates as the "responsible party" (as defined in POPIA) for your personal information. In other cases, we may act as an "operator" on behalf of a third-party responsible party, in which case the privacy terms of that responsible party will apply.
- 1.5 By using QM Easy's platform or services, you agree to this Policy, which creates a legally binding agreement between you and us. If you do not agree with any part of this Policy, please discontinue use of our platform and services.
- 1.6 Changes to this Policy: We may update this Policy periodically to reflect changes in our services, the law, or internal operations. You will be notified of any material changes, and it is your responsibility to review the updated Policy when using our platform. Continued use of our services signifies your acceptance of the changes.

## 2. PERSONAL INFORMATION WE COLLECT

- 2.1 By using QM Easy's website and services, you consent to the collection, collation, processing, and use of the following personal information:
- 2.1.1 Information provided by you:
  - Name, email address, contact details, school name, and job role.
  - Information required for user account registration and access to services, such as username and password.
  - Billing information for subscription purposes, including banking or payment details.
- 2.1.2 Information collected automatically:
  - Internet Protocol ("IP") address, browser type and version, geographic location, and activity logs on our platform.
  - Information from cookies and other tracking technologies (see Clause 11).

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- 2.1.3 Information from public sources:
  - Information that you have made publicly available, such as social media profiles, where applicable.
- 2.2 Users are responsible for ensuring that any personal information provided is accurate, complete, and up to date. QM Easy cannot be held responsible for incorrect or outdated information provided by users.
- 2.3 QM Easy does not knowingly process the personal information of individuals under the age of 18. If you are under 18, do not provide us with your personal information.
- 2.4 By providing third-party information (e.g., authorizing another party to share your details with QM Easy), you confirm that you have the legal authority and consent to do so.

### 3. WHEN DO WE COLLECT YOUR PERSONAL INFORMATION

We process your personal information in the following circumstances:

3.1 When you register for an account on QM Easy or subscribe to our services. 3.2 When you submit an inquiry or request support via email or our platform. 3.3 When you engage with us on social media or other digital platforms. 3.4 When you access or use our platform for QMS-related services. 3.5 When you participate in user feedback or surveys.

# 4. HOW WE USE YOUR PERSONAL INFORMATION

- 4.1 QM Easy processes your personal information for legitimate business purposes, which include:
  - Providing access to and functionality on the platform.
  - Managing user accounts and subscriptions.
  - Generating personalized score sheets and reports for QMS appraisals.
  - Improving platform features and user experience based on feedback and analytics.
  - Communicating important updates, service changes, and promotional offers (where consent is provided).
- 4.2 Your personal information will not be used for purposes unrelated to our services without your explicit consent.





### 5. DISCLOSURE OF PERSONAL INFORMATION

- 5.1 QM Easy may share your personal information with:
  - Employees and contractors who need the data to provide services.
  - Third-party service providers, such as payment processors and email services, under strict confidentiality agreements.
  - Law enforcement or regulatory authorities when required by law.
  - Third parties in the event of a business restructure, merger, or sale.
- 5.2 We ensure that any third-party processors comply with POPIA and handle your data with the same level of care and security as QM Easy.

#### 6. DATA SECURITY

- 6.1 QM Easy implements appropriate technical and organizational measures to secure your personal information against unauthorized access, loss, or damage.
- 6.2 Passwords and Persal numbers provided by users are encrypted using Advanced Encryption Standard (AES) encryption and stored in their encrypted state, ensuring that unauthorized access to profiles and Department of Education number is minimized.
- 6.3 The QM Easy platform is hosted on a dedicated Afrihost server, ensuring robust security and reliability. Afrihost is recognized as one of South Africa's top service providers, offering advanced security features such as:
  - Data encryption to protect sensitive information.
  - Regular security audits and vulnerability assessments.
  - Built-in firewalls and intrusion detection systems to safeguard against unauthorized access.
  - High-availability infrastructure with failover and redundancy mechanisms to ensure uninterrupted service delivery.
- 6.4 All data is securely stored in an SQL Server database, offering several layers of protection. SQL Server databases provide:
  - Advanced encryption for data at rest and in transit.
  - Role-based access control to ensure only authorized personnel can access sensitive information.
  - Regular security updates and patches to safeguard against vulnerabilities.
  - Robust backup and recovery options to ensure data integrity in the event of a failure.





6.5 While we strive to protect your data, we cannot guarantee absolute security due to the inherent risks of data transmission over the internet. Users are encouraged to take precautions, such as using strong passwords and keeping login credentials confidential.

# 7. YOUR RIGHTS

- 7.1 Under POPIA, you have the right to:
  - · Access personal information held about you.
  - Request correction or deletion of inaccurate, irrelevant, or outdated data.
  - Object to the processing of your data for specific purposes, such as direct marketing.
  - Withdraw consent for data processing (where applicable).
- 7.2 To exercise your rights, please contact us at <a href="mailto:qmeasy@syncflo.co.za">qmeasy@syncflo.co.za</a>

### 8. COOKIES AND TRACKING TECHNOLOGIES

- 8.1 QM Easy uses cookies to enhance your user experience and improve platform functionality. By using the platform, you consent to the use of cookies unless you disable them in your browser settings.
- 8.2 For more information about the types of cookies used, please contact <a href="mailto:qmeasy@syncflo.co.za">qmeasy@syncflo.co.za</a>

# 9. MARKETING COMMUNICATIONS

9.1 Users may opt-in to receive marketing communications about QM Easy's services and updates. You may unsubscribe at any time by clicking the "unsubscribe" link in emails or contacting us directly.

### 10. CONTACT US

For questions or concerns regarding this Privacy Policy, please contact:

Syncflo (Pty) Ltd Email: <a href="mailto:qmeasy@syncflo.co.za">qmeasy@syncflo.co.za</a> Website: <a href="mailto:www.qmeasy.co.za">www.qmeasy.co.za</a>