

# MARKETPLACE PRIVACY NOTICE

**CampusTechExchange**

**Last updated: 12 May 2024**

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## Introduction

The website <https://www.campustechexchange.com> (**‘the Marketplace’**) and mobile application is owned and operated by Campus Tech Marketplace (Pty) Ltd, a private company registered per the laws of the Republic of South Africa (**‘CTE, ‘we’, ‘us’, or ‘our’**).

This Marketplace Privacy Notice (**‘this Notice’**) describes how and why we collect, store, use, and or share (**‘process’**) your personal information.

This Notice is incorporated into our [Marketplace Terms of Service](#). All capitalized terms used but not defined in this Notice have the meanings assigned to them in the [Marketplace Terms of Service](#).

## When does this Notice apply?

This Notice applies to you when:

- You visit or otherwise interact with the Marketplace;

- You provide us with your details via the contact form on the Marketplace;
- You register an account on the Marketplace;
- You make a purchase or payment on the Marketplace;
- You download content from the Marketplace; or
- You otherwise interact with us.

(Collectively referred to as “**our Services**”).

## How to contact us?

Our Information Officer handles questions concerning this Notice, your data protection rights, access to information rights and any complaints.

### You can contact our Information Officer at:

- Email Address: [info@campustechexchange.co.za](mailto:info@campustechexchange.co.za).
- Telephone No: +27 (72) 887 9256

### Our company registration information is as follows:

- Company Registration Number: 2024/000436/07
- Registered Address: Campus Tech Marketplace (Pty) Ltd  
5 Kogelberg Street  
Mount Simon Estate  
Stellenbosch  
7600

## What personal information do we collect and how do we collect it?

We collect personal information that you voluntarily provide to us when you express an interest in obtaining details about us or our Services, or otherwise when you contact us, and also automatically through our Services and technologies.

### Personal information you provide directly to us.

The personal information we collect depends on the context of your interaction with us and the Services.

For example, we collect personal information from you when you:

- Register to use our Marketplace;
- List Goods for sale on our Marketplace;
- Make a purchase order using our Marketplace;
- Use our online messaging facilities;
- inquire about any of our Services;
- Sign-up for any marketing communications from us;

- Contact us, open emails from us or otherwise interact with us;
- Download content from us; or
- Submit forms, questionnaires, surveys or participate in research.

## Registration, Listings and purchases on our Marketplace

When you register to use our Marketplace or make a purchase order on our Marketplace, we may collect the following personal information about you:

- Full Name
- Phone Numbers
- Name of Tertiary Education Institution
- Image of Student Card
- Billing Address
- Company Name and job title
- Gender
- Your Account Username and Password
- Email Address
- Physical Address
- Language
- User Profile Picture / Image
- Age and Government-issued identification number
- Buyer's Payment card number, verification number, and expiration date
- Seller's Bank Account Number, Bank, Branch and other details,
- Description of Goods listed, ordered, inspected, purchased or sold
- Preferred meeting place for inspection and exchange
- Videos and images of working condition of Goods

Should your personal information change or you wish to correct this personal information you can do this by updating your user information in your account profile.

## Correspondence and inquiries

This includes messages between you and us, and between us and third parties, including correspondence relating to any Goods, service or enquiry, or performance of any contract you have with us or a Seller/Buyer.

## Online Messaging Facility: Usage, Privacy, Monitoring and Law Enforcement Disclosure

Our online messaging facility is an essential component of our service, facilitating communication between Buyers and Sellers. When you use our chat function, we collect and store:

- The content of your messages to ensure compliance with our policies, provide support, and maintain the safety and security of our Marketplace.
- Timestamps of messages to verify transactions and comply with our managed payment service provider obligations.
- Any personal information shared within these messages, such as meeting details or additional contact information.

**Chats are NOT private or confidential.** The chat facility is intended solely for facilitating transaction-related communications, specifically to arrange meetings for the inspection and completion of sales. It is important that users refrain from sharing sensitive personal information through this chat facility. Sensitive personal information includes, but is not limited to, financial details, personal identification numbers, passwords, and any other information that could compromise your personal security and privacy.

**Permissible Use.** The chat facility must only be used to arrange meetings for the purpose of inspecting goods and completing sale transactions. Users are strictly prohibited from using the chat for any other purposes. This includes, but is not limited to, sending unsolicited commercial messages, engaging in unlawful activities, or sharing content that violates the rights of others or is harmful, abusive, racially or ethnically offensive, defamatory, or invasive of personal privacy.

**Consent to Monitor Communications.** By accepting our Terms of Service, users expressly consent to our monitoring of communications conducted through the online messaging facility. This

monitoring is done in compliance with RICA and may be done for several reasons:

- **Ensuring Compliance:** To verify that communications adhere to our marketplace policies and the designated use of the chat facility.
- **Investigating Complaints or Incidents:** To address any reports of misuse, disputes between users, or other issues affecting the integrity of the marketplace.
- **Detecting Fraud and Other Prohibited Activities:** To prevent and detect fraud, security breaches, or any other prohibited activities that could undermine the safety and trustworthiness of our platform.

**Sharing with law enforcement.** In certain circumstances, we may be required to share your communications with law enforcement or regulatory authorities. This will occur strictly in accordance with legal obligations and in response to valid legal requests related to investigations or legal proceedings where such information is pertinent.

### Contact-us forms

When you submit an online 'contact us' form to us, we may collect the following personal information about you:

- Full Name
- Phone Numbers
- Name of Tertiary Education Institution
- Phone Country Code
- Email Address
- Job Title or position if you are acting for a business or other organisation
- Company Name
- Geolocation based on IP identification.
- Your inquiry or request

### Information we automatically collect.

#### Cookies and similar technologies

We collect certain information automatically, including but not limited to:

- Interaction data (clicks and views)
- IP address and technical details
- Device and internet connection details
- Geolocation data (general region, specific location with permission); and
- Cookies and similar technologies usage data

This means when you access or view our Marketplace, whether or not you are a registered user, we can see:

- what you click.
- what you view.
- how long you spend on pages.
- your city or town (not exactly where you are unless we ask permission).
- your device and internet connection details such as: type of device you're using, IP address and details about your internet connection, technical details such as your screen size and the software you're using, such as your web browser.
- your unique advertising or other identification numbers allocated to your browser or device

We don't often know exactly who you are from this data. But sometimes we may connect this data with other information we hold about you, for example, when you submit a form to us.

To learn more about how we use cookies, view our Cookie Statement.

Some of this data is collected by:

- **Our partners:** These may be website hosts or social media sites.
- **Cyber-security filtering technology:** This keeps our website safe from fraud and crime.
- **Cookies and similar technology:** These are set on your device by us and our trusted partners, such as Google Analytics.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

### Information collected from third parties

Sellers and Buyers may occasionally supply us with your contact information and purchase information to allow us to respond to any queries or complaints concerning the products or services listed on our Marketplace.

## Why do we process your information and what is our lawful basis?

According to the Protection of Personal Information Act 4 of 2013 (“**POPIA**”), processing of personal information must be justified. We process your personal information on one or more of the following grounds:

### Contract

We process your personal information if it is necessary to enter into a contract with you or perform under a contract we have with you. This includes to:

- identify you;
- create a user account for you;
- process your instructions, purchases, and payments;
- communicate with you about the Goods purchased;
- fulfil our contractual obligations to you, including our obligations as a Managed Payment Service Provider, when you have ordered, paid for or sold Goods through our Marketplace;
- enforce any agreement we have with you;

### By law

We process personal information to comply with our legal obligations, for example to:

- verify your identity and age;
- fulfil reporting requirements and data subject access requests;
- meet our regulatory and record-keeping obligations.

### Legitimate interests

We process personal information when it is necessary to pursue our legitimate interests. This includes:

- to deliver the Marketplace:
  - we use your information to operate the Marketplace and monitor how well it is working. Most websites do this.

- to improve our business:
  - we may use your information to:
    - understand how you use our Marketplace and other Services.
    - view trends in product offerings.
    - develop well targeted offers and products.
    - find offers and products that may be of interest to you.
    - make our services better, and improve the quality of products and content for you.
    - learn how useful our marketing is and make it better.
- to answer any request, you submit to us to contact you, or questions you might have:
  - we may respond to requests for more information, proposals or quotations, and provide you with information about the things we create or do;
- to personalise our Marketplace:
  - when you visit our Marketplace, we may use data we collect to make the site reflect your preferences. This could include:
    - tailoring our Marketplace content and services for you.
    - showing you information or updates that might be useful for you.
    - showing products or services that we think will be of interest to you.
- If we have your consent, we may use your email address to send you email marketing communications. You can opt-out of our marketing emails at any time.
- for security and protection:
  - we may use your information to help protect you and ourselves against fraud or crime.
- enforce or defend any legal claims;
- manage business continuity incidents, risks and emergencies;
- undertake research for statistical purposes. The research and statistics we get from this process do not include your personal information and cannot be linked to you, nor can you be identified from these statistics.

## Consent

Where we have obtained your consent, we may process your personal information in accordance with the consent we obtained from you. For example, this could include:

- to send you email and other electronic marketing and promotional communications:
  - If we have your consent, we may use your email address to send you email marketing communications. You can unsubscribe to these marketing emails at any time by clicking the unsubscribe link at the bottom of our marketing emails.
- to monitor your communications on our online messaging facility for purposes described in this Privacy Notice;
- to use cookies and similar technologies which are not strictly necessary to the operation of the Marketplace.
  - You can manage your cookies preferences when visiting the Marketplace or using your browser.

## When you provide us with information about others

If you provide us with the personal information about someone else (such as a friend), **you are responsible** for ensuring that you comply with any obligations and consent requirements under applicable data protection laws concerning such disclosure. You must provide them notice and you confirm that you have, if required by law, obtained the individual's consent to provide us with this personal information. It is your responsibility to explain to them how we collect, use, disclose and retain their personal information, or otherwise direct them to read this Notice.

## Consequences of not sharing compulsory information with us

Where we must process certain personal information by law, or in terms of a contract that we have entered with you, and you fail to provide such personal information when requested to do so, we may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, we may be required to terminate the contract or relationship with you, upon due notice to you.

## Automated decisions about you

We do not use your personal information to make any automated decisions about you.

## When and with whom do we share your personal information?

We may share your personal information with third-party vendors, service providers, contractors or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work.

We have contracts in place with our third parties which are designed to help safeguard your personal information. This means they cannot do anything with your information unless we have instructed them to do it and they will also not share your personal information with any other organisation apart from us.

The categories of third parties we may share your information with are as follows:

- cloud computing services;
- data analytics services such as **Google Analytics**;
- security and authentication services: -
 

- one of our security providers is Google ReCAPTCHA. Google asks us to tell you that this is subject to the **Google Privacy Policy** and **Terms of Use**.
- regulatory authorities when required by legislation or any legal process;

We may also share and disclose your personal information in the following situations:

- **Transactions involving our Business Partners**: When you inquire about or purchase a product or service listed by our Business Partners, we may share your information with that Business Partner in order to enable them to liaise directly with you regarding any products or services you have purchased, for them to comply with their regulatory obligations, or for any other purpose which may require their involvement to respond to your inquiry or to facilitate your purchase order.
- **Affiliates or contracted service providers**: We may employ Affiliates or contracted service providers to perform functions on our behalf. Examples, include sending communications, processing payments, Know-Your-Customer assessments, analysing data, and providing marketing and sales assistance, conducting customer relationship management, and providing training. We may share your information with our Affiliates for these purposes, in which case we will require those Affiliates to



honour this Privacy Notice. “**Affiliates**” include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

- **Protection of us and others:** We may release account and other personal information when we believe it is appropriate to comply with the law, enforce or apply our terms and other agreements, or protect the rights, property, or security of CTE, our Affiliates, our customers, our users or others. This includes exchanging information with other companies and organizations for fraud or crime prevention and detection.
- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With your consent:** We may also disclose your personal information in other ways you direct us to.

## How long do we keep your information?

We keep your Personal Information for as long as:

- we need it to provide our Marketplace, or Services to you;
- it is required or allowed by law, and in accordance with our internal data retention policies;
- it is necessary to uphold the contract between you and us;
- it is needed to help detect or prevent fraud and financial crime, or answer requests from regulators;
- you have consented to us keeping your personal information, however you may request that we stop processing your personal information.

If your personal information is used for multiple purposes, we will keep it until the purpose with the latest retention period expires. However, we will stop using it for the purpose with a shorter retention period once that period expires.

## Location and transfer of personal information

We store your personal information securely on servers in South Africa and we maintain a high level of security measures to prevent unauthorised access and accidental loss of your information.

Campus Tech Marketplace (Pty) Ltd is located in South Africa. Depending on the scope of your interactions with the Marketplace and Managed Payment Services, your personal information will generally be stored in South Africa.

Where your personal information is transferred to countries that may not necessarily have data protection laws as comprehensive as South Africa. We'll ensure your personal information has an appropriate level of protection and that the transfer is in line with applicable legal requirements.

We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests.

## How do we keep your information secure?

We apply strict technical and organisational measures to ensure the security, integrity and confidentiality of information. We do this to prevent loss of or damage to personal information and to prevent the unauthorised access to personal information.

Interactions with our Marketplace may be protected through encryption that complies with international standards. For example, encryption may be used to protect the transmission of your personal information when completing online forms. Our Internet servers are also protected by firewalls and intrusion detection

systems. Access to information on these servers is restricted to authorised personnel only.

We require our staff and any Third-Parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information

## Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies (such as web beacons and pixels) to access or store information. More details about how we use such technologies and how you can refuse certain cookies are described in our Cookie Statement.

## Third party sites and services

The Marketplace may have embedded content provided by others or include links to other websites and products. These companies may collect information about you when you interact with their content or services. We are not responsible for the practices of these companies. Please consult their privacy policies to learn about their data practices.

## Children's personal information

We don't provide offerings targeted at or for purchase by children. Therefore, we will not knowingly solicit or collect personal information in respect of children. If you're under 18, you may only use the Marketplace with the involvement of a parent or guardian. In which case, your parent or guardian **must** act as the registered user when making purchases or inquiries.

## Your rights

You have several rights in relation to the information that we hold about you. These rights include:

- the right to see information we hold about you and to get information about what we do with it;
- if we rely on your consent to process your personal information, you have the right to withdraw your consent at any time, that you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or ask that we send it to a third party;
- the right to ask that we correct your information if it's inaccurate or incomplete;
- in some circumstances, the right to ask that we delete your information. We may continue to keep your information if we're entitled or required to keep it;
- the right to object to, and to ask that we limit our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to limit our processing of your information but we're entitled to continue and/or to refuse that request.

You can exercise your rights by contacting us using the details set out in the 'How to Contact Us' section above.

You also have a right to complain to us or the Information Regulator of South Africa. **We ask that you first submit any complaints or requests directly to us.** If you are not satisfied with our response, then you may submit your complaint to the regulator.

### The Information Regulator Contact Details.

- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
- **Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017.

You may direct general enquiries by email to: **enquiries@infoeregulator.org.za**. You may direct complaints by email to: **POPIAComplaints@infoeregulator.org.za**.

## Changes to this policy

We may from time to time amend the terms of this policy and upload an updated Privacy Notice to our Marketplace. Please check our website for the most recent version.