



<b>Document Title</b>	<b>COOKIE POLICY</b>		
<b>Document Number</b>	IP_CP001	<b>Revision Number</b>	01
<b>Type of Document</b>	Policy	<b>Revision Date</b>	01 July 2023

# COOKIE POLICY

<b>ACCOUNTABILITY</b>	<b>Name &amp; Position</b>	<b>Signature</b>	<b>Date</b>
Compiled By	ML Gama Compliance Officer		03 July 2023
Approved By (Responsible)	A Kruger Director		03 July 2023
Authorised By (Accountable)	A Kruger Director		03 July 2023



<b>Document Title</b>	<b>COOKIE POLICY</b>		
<b>Document Number</b>	IP_CP001	<b>Revision Number</b>	01
<b>Type of Document</b>	Policy	<b>Revision Date</b>	01 July 2023

## Table of contents

1. COOKIE DEFINITIONS.....	4
2. WHAT COOKIES DO WE USE AND WHY? .....	5
3. WHEN DO WE REQUIRE YOUR CONSENT? .....	6
4. HOW TO DELETE AND BLOCK OUR COOKIES .....	6
5. COOKIE LIST.....	7
6. CONTACT US.....	7
7. POLICY COMPLIANCE AND MONITORING .....	7
8. COMPLIANCE MEASUREMENT.....	8
9. NON-COMPLIANCE .....	8
10. VALIDITY AND DOCUMENT MANAGEMENT .....	8
11. REFERENCE DOCUMENTS.....	8



Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

**A PERSON USING TELCOEXCHANGE (PTY) LTD DOCUMENTS OR DATA ACCEPTS THE RISKS OF:**

- a) *Using the documents or data in hard copy version without requesting and checking them for accuracy against the original electronic published document.*
- b) *Uncontrolled if printed.*
- c) *Using the documents or data for any purpose not agreed to in writing by Telcoexchange (Pty) Ltd.*

Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

## DOCUMENT VERSION AND CHANGE CONTROL

VERSION	DATE	AUTHOR	COMMENT / SUMMARY OF UPDATES
Draft	03/07/2023	ML Gama	

At <https://www.ithrees.co.za/about-us.html> we strive to honour the privacy and security of any data we collect from visitors using our website, whilst we act as a personal data Responsible Party under relevant data protection rules and regulations. Our website uses cookies, in combination with pixels, local storage objects, and similar devices (collectively, “cookies” unless otherwise noted) to distinguish you from other users of the website. This helps us provide you with a good experience, improve our service, and to personalise ads and content to you while you use the website.

This cookie policy (“Cookie Policy”) describes the types of the cookies we use on the website and our purposes for using them.

If you have questions about this Cookie Notice, please contact us at <https://www.ithrees.co.za/contact-us.html>. For a more complete description and list of the cookies that we currently use on the website, please review our Cookie List found in section 5 of this document. For more information about our privacy practices, please review our Website Privacy Policy: <https://www.ithrees.co.za/about-us.html>. If you have any questions or comments regarding this notice or data privacy, please contact us at <https://www.ithrees.co.za/contact-us.html>.

Please read this Cookie Notice carefully for details about why we use cookies and the information they collect from and about you.

### 1. COOKIE DEFINITIONS

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device, which is like computer memory.

**First and third-party cookies:** whether a cookie is 'first', or 'third' party refers to the domain placing the cookie.

- i. *First-party cookies* are those set by a website that is being visited by the user at the time (e.g., cookies placed by our website domain).
- ii. *Third-party cookies* are cookies that are set by a domain other than that of the website being visited by the user. If a user visits a website and another entity sets a cookie through that website, this would be a third-party cookie.

**Persistent cookies:** these cookies remain on a user’s device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

**Session cookies:** these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

## 2. WHAT COOKIES DO WE USE AND WHY?

Generally, the website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and also allows us to improve it. The cookies we may use on the website may be categorised as follows:

- i. Strictly necessary
- ii. Performance
- iii. Functionality
- iv. Targeting

Some cookies may fulfil more than one of these purposes.

**'Strictly Necessary'** cookies let you move around the website and use essential features like secure areas. Without these cookies, we cannot provide the requested services.

*We use these Strictly Necessary cookies to:*

- Identify you as being logged in to the website and to authenticate you.
- Make sure you connect to the right service on the website when we make any changes to the way it works.
- For security purposes.
- Make sure you connect to the right service on the website when we make any changes to the way it works.

If you prevent these cookies, we can't guarantee how the website or the security on the website will perform during your visit.

**'Performance'** cookies collect information about how you use the website, e.g. which pages you visit, and if you experience any errors. These cookies do not collect any information that could identify you and are only used to help us improve how the website works, understand the interests of our users, and measure the effectiveness of our advertising.

*We use performance cookies to:*

- Carry out web analytics: Provide statistics on how the website is used.
- Perform affiliate tracking: Provide feedback to affiliated entities that one of our visitors also visited their site.
- Obtain data on the number of users of the website that have viewed a product or service
- Help us improve the website by measuring any errors that occur.
- Test different designs for the website.

Some of our performance cookies are managed for us by third parties.

**'Functionality' cookies** are used to provide services or to remember settings to improve your visit.

*We use 'Functionality' cookies for such purposes as:*

- Remember settings you've applied such as layout, text size, preferences, and colours.
- Remember if we've already asked you if you want to fill in a survey.
- Remember if you have engaged with a specific component or list on the website so that it won't repeat.
- Show you when you're logged in to the website.
- To provide and show embedded video content.

Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

Some of these cookies are managed for us by third parties.

**'Targeting'** cookies are used to track your visit to the website, as well other websites, apps and online services, including the pages you have visited and the links you have followed, which allows us to display targeted ads to you on the website. cookies are used to track your visit to the website, as well other websites, apps and online services, including the pages you have visited and the links you have followed, which allows us to display targeted ads to you on the website.

We may use *targeting cookies* to:

- Display targeted ads within the website.
- To improve how we deliver personalized ads and content, and to measure the success of ad campaigns on the website.

### 3. WHEN DO WE REQUIRE YOUR CONSENT?

All cookies require your consent.

We request your consent before placing them on your device. You can give your consent by clicking on the appropriate button on the banner displayed to you. If you do not wish to give consent or wish to withdraw your consent to any cookies at any time, you will need to delete, and block or disable cookies via your browser settings; (see below for more information on how to do this). Please note that disabling these cookies will affect the functionality of the website and may prevent you from being able to access certain features on the website.

### 4. HOW TO DELETE AND BLOCK OUR COOKIES

Most web browsers allow some control of most cookies through the browser settings. However, if you use your browser settings to block all cookies (including strictly necessary cookies), you may not be able to access all or parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit the website.

**Changing your Cookie Settings.** The browser settings for changing your cookies settings are usually found in the 'options' or 'preferences' menu of your internet browser.

In order to understand these settings, the following links may be helpful. Otherwise, you should use the 'Help' option in your internet browser for more details.

- Cookie settings in Internet Explorer
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari

**More information.** To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org)



Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

## 5. COOKIE LIST

Technical Name		Purpose	Session/Persistent	Type
_ga	Google Analytics - Third Party Cookie	Used by Google Analytics to distinguish users and sessions. More info here <a href="https://developers.google.com/analytics/dev-guides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/dev-guides/collection/analyticsjs/cookie-usage</a>	Persistent - 2 years	Performance

## 6. CONTACT US

You can contact us at:

Address: 7 Rambo Junction 400 Roan Crescent Corporate Park North Randjiespark Gauteng 1685  
Phone: 012 883 1800  
e-mail: [marius@ianet.co.za](mailto:marius@ianet.co.za)

## 7. POLICY REVIEW

Legal and compliance department undertakes to review this policy on an annual basis.

The RACI matrix roles and responsibilities shall participate in each review cycle.

## 8. AUDIT AND ACCOUNTABILITY

The Audit Department or other relevant department is responsible for auditing how well business departments implement this Policy.

## 9. CONFLICTS OF LAW

This Policy is intended to comply with the laws and regulations in the place of establishment and of the countries in which the Company operates. In the event of any conflict between this Policy and applicable laws and regulations, the latter shall prevail.

## 10. POLICY COMPLIANCE AND MONITORING

Implementation and enforcement of this Cookie Policy is ultimately the responsibility of all employees at Telcoexchange (Pty) Ltd.

Monitoring user compliance and investigating and reporting breaches of this policy will be in accordance with the Incident Management Policy.



Document Title	COOKIE POLICY		
Document Number	IP_CP001	Revision Number	01
Type of Document	Policy	Revision Date	01 July 2023

## 11. COMPLIANCE MEASUREMENT

The Information Officer is responsible for:

- Ensuring that all relevant employees of Telcoexchange (Pty) Ltd, as well as relevant external parties, are familiar with this document.
- Ensuring that the implementation of supporting controls ensures the ongoing adherence to the requirements of this policy.

Persistent and repeated breaches of the policy should be referred to the Information Officer.

## 12. NON-COMPLIANCE

Relevant employees or contractors of Telcoexchange (Pty) Ltd systems shall comply with this document.

Violation of this document and of relevant security requirements will therefore constitute a breach of trust between the employee or contractor, and Telcoexchange (Pty) Ltd and may be subject to disciplinary action, up to and including termination of employment or contractual services.

## 13. VALIDITY AND DOCUMENT MANAGEMENT

The validity criteria relate most specifically to the Control Review and Assurance Attestation process within the Control Validity policy. The provisions of this policy relate to the mitigation of identified threats and risks as documented in the Risk Register of the IPMS system. During the Control Assurance process, defined in the Control Validity policy, every Control Owner must provide evidence of adequacy of the control provisions and effectiveness of the control provisions within the Information Privacy environment of Telcoexchange (Pty) Ltd. Considering both the internal and external context.

This document is valid as of the IPMS approval system date.

The owner of this document is the Director, who must check and, if necessary, update the document at least once a year, which must occur within the governance process defined in Clause 3 of this policy.

When evaluating the effectiveness and adequacy of this document, the following criteria need to be considered:

- Available on the company website and up to date.
- RUBIQ employee compliance attestation is 100%.
- [RUBIQ employee test assessments are not less than 85% complete and scores are not less than 85%, this is applicable where exercises have been created within RUBIQ for this policy].

## 14. REFERENCE DOCUMENTS

IP\_PP001          Privacy Policy