

Inspired Testing (Pty) Ltd
&
Inspired Testing Limited
&
InspiredXpert Limited

**PRIVACY POLICY FOR VISITORS TO INSPIRED TESTING WEBSITES
(INST046)**

Version:	0.1
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Created by:	Lucas Scheepers
Approved by:	Lucas Scheepers
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Change History

Date	Version	Created By	Description of Change
18/07/2024	0.1	Alexandra Townsend	Created
29/10/2024	0.2	Alexandra Townsend	Added InspiredXpert Ltd.
29/09/2025	0.3	Alexandra Townsend	Added clause 7.3 for Use and 16.1 and 16.2 Contact information for Regulators/Commissioners

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1. Introduction

Inspired Testing (Pty) Ltd, a company incorporated in South Africa with registration number 2019/095688/07 and registered address at 2 Venus Street, Melrose Estate, Gauteng, South Africa, 2196.

Inspired Testing Ltd, a company incorporated in England and Wales with company number 10141744 and registered address at C/- Sable International, 5th Floor, 18 St. Swithin's Lane, London, EC4N 8AD

InspiredXpert Ltd, a company incorporated in England and Wales with company number 10141744 and registered address at C/- Sable International, 5th Floor, 18 St. Swithin's Lane, London, EC4N 8AD

Together, "Inspired"

2. Purpose, Scope, and Users

Inspired is a UK and South African based software testing company focused on digital enablement for clients globally. Inspired Testing is committed to protecting the privacy of our website users ("you" or "your"). This Privacy Policy outlines how we collect, use, disclose, and safeguard your information in accordance with the ISO 27001:2022 standard, Cyber Essentials, the Protection of Personal Information Act (POPIA), the General Data Protection Regulation (GDPR), and all applicable data protection laws.

This document is applied to the entire Information Security Management System (ISMS) scope, i.e. to all persons and data in the ISMS scope.

Users of this document are all users of the Inspired Testing website including prospective clients, current clients, prospective job seekers and all interested parties.

3. Reference Documents

- ISO/IEC 27001:2022 standard, clauses A5.34; A8.11
- Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (POPIA)
- General Data Protection Regulation (EU) 2016/679 (GDPR)
- INST032 – Supplier Security Policy
- INST007 – Data Protection Policy
- Inspired Testing PAIA Manual

4. Personal Information and Personal Data

Personal information and personal data includes, but is not limited to:

- certain information that we collect automatically when you visit our website,
- certain information collected on registration (see below),
- certain information collected on submission, and
- optional information that you provide to us voluntarily (see below).

but excludes:

- information that has been made anonymous so that it does not identify a specific person,
- permanently de-identified information that does not relate or cannot be traced back to you specifically,

- non-personal statistical information collected and compiled by us; and information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Common examples of the types of personal information and personal data which we may collect, and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind,
- contact information – such as your phone number or email address,
- address information – such as your physical or postal address.

5. Acceptance of Policy for provision of Services

5.1 Acceptance required

You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then we may not proceed with your request.

5.2 Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

5.3 Your obligations

You may only provide us with your own personal information or the entity that you represent (where you have their permission to do so). For the avoidance of any doubt, you may not provide us with someone else's personal information.

5.4 Acceptance of Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you continue to use the website or services following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

6. Collection

6.1 On submission

Once you provide your personal information our website, you will no longer be anonymous to us. You will be required to voluntarily provide us with certain personal information when you register on our website. This personal information will include:

- your name and surname,
- your email address,
- your telephone number,

- your job title,
- your company name,
- your city and country of residence,

If you are a prospective customer: We will use this personal information to better understand your service requirement and establish contact with you for the purpose of providing services to you.

If you are a job seeker: We will use this personal information to establish contact with you should you be suitable for any of our job opportunities.

6.2 On order or request

When you request our services from us, or are exploring prospective employment with Inspired Testing, you may be asked to provide us with additional personal information on a voluntary basis.

6.3 Data we collect automatically

Provided that you give your consent to do so, we will automatically collect the following types of data based on each of your visits to our Site

- **Technical Data:** the Internet protocol (IP) address used to connect your computer to the Internet. This is defined as Personal Data under the GDPR.
- **Usage Data:** information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs, YouTube videos watched from site) and methods used to browse away from the page.

6.4 Cookies

The Site may use cookies from time to time. “Cookies” are small text files which are stored by your browser on your computer and are normally used to gather statistical information and to analyze trends of use or access to a website. Cookies cannot be used to run programs or deliver viruses to your computer.

What are Cookies used for?

Cookies may be used to save your personal preferences so you do not have to re-enter them each time you access the Site.

We will always notify you as to the cookies used the Site, and request your permission for their use. You will also have options to opt out on cookie usage/ delete cookie. For more about our use of cookies and how you can disable them

6.5 Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

6.6 Third Party Services

In addition to our website, we also use third party services. We use email platforms such as MailChimp, EventBrite and Pardot to collect your Personal Data as defined above and enhance our operations, communication, and event management. We also utilize third-party services, such as Breezy HR, to enhance our recruitment process. These services help us manage job postings, track applicants, schedule interviews, and collaborate on hiring decisions. When you apply for a position through Breezy HR, we collect and process your personal information as described in our privacy policy. Breezy HR adheres to strict data protection standards to ensure the security of your information. When using these platforms, we encourage you to review their privacy policies.

- **MailChimp** - [Privacy Policy](#)
- **EventBrite** - [Privacy Policy](#)
- **Sharpspring** - [Privacy Policy](#)
- **Breezy HR** – [Privacy Policy](#)

By using our services and platforms, you acknowledge that you have read and understood this privacy policy and consent to the collection, use, and sharing of your personal information as described herein.

6.7 Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

6.8 Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- Services purposes – such as collecting requests for and providing our services.
- Processing job applications when you apply for vacancies advertised on our website which are applicable to you.
- Marketing purposes – such as pursuing lawful related marketing activities such as events and Webinars which may be relevant to you and relate to our services.
- Legal purposes – such as handling claims, complying with regulations, or pursuing good governance.
- We may use your usage information for the purposes described above and to remember your information so that you will not have to re-enter it during your visit or the next time you access the website.
- Monitor website usage metrics such as total number of visitors and pages accessed, and
- Track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.
- When you provide us with any registration information or optional information.

7. Use

7.1 Our obligations

We may use your personal information to fulfil our obligations to you.

7.2 Messages and updates

We may send administrative messages and email updates to you about the website any marketing campaigns. We may wish to provide you with information about new services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

7.3 Job applications and client queries

We may use personal information that you provide when applying for a role with us to process and evaluate your job application, including assessing your skills, qualifications, and suitability for the role. We may also use personal information you provide in client queries to respond to, manage, and resolve your requests or concerns.

8. Disclosure

8.1 Sharing

We may share your personal information with partners and other divisions or companies within the group of companies to which we belong so as to provide joint content and services to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);

8.2 Regulators

We may disclose your personal information as required by law or governmental audit.

8.3 Law enforcement

We may disclose personal information if required:

- by a subpoena or court order,
- to comply with any law,
- to protect the safety of any individual or the general public, and
- to prevent violation of our customer relationship terms.

8.4 No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

8.5 Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

8.6 Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our sales and marketing department.

8.7 Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

9. Security

We take our security responsibilities seriously, using the most appropriate physical and technical measures and require our hosting partner to use the same standard of care. Unfortunately, the transmission of information via the internet is not completely secure. Although we will always do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. For more information on our information security policies and procedures, send an email to legal@inspiredtesting.com

10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy. From time to time, we may establish contact with you to request updates to your personal information. You are able to review or update any personal information that we hold on you by emailing us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before supplying you with any information or making any corrections to your personal information.

11. Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law, or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

12. Transferring your Personal Data or Personal Information outside the EU (GDPR) or outside of the Republic (POPIA)

Personal Data may be transferred to our trusted partners and service providers who maintain their servers outside of the European Economic Area (“EEA”), where the privacy and data protection laws may not be as protective as those in your jurisdiction. This is only for the purposes of providing, and to the extent necessary to provide, the Services to you. There are special requirements set out under Chapter V of the GDPR (with which we would comply) to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer. For more information about this and the safeguards in place relating to the transfer, please contact us by email at legal@inspiredtesting.com

Subject specifically to the requirements of Section 72 of POPIA, read together with the entire Act, we may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected, in a foreign country with comparable data protection laws. We will require your consent should we need to transfer your information outside of the country in which it was collected to a foreign country with comparable data protection laws.

13. Updating or Removing

You can request changes to your personal information that you have submitted to us at any time by following the process as prescribed by our [PAIA manual which can be found on our website](#).

14. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

15. Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us: legal@inspiredtesting.com

16. Supervisory Authority

We are committed to complying with the terms of the GDPR and POPIA and to the processing of personal data and personal information in a fair, lawful and transparent manner. If, however, you believe that we have not complied with our obligations under the GDPR or POPIA, you have the right to lodge a complaint with the **Office of the Data Protection Commissioner (UK)** or the **Information Regulator (South Africa)**.

16.1. United Kingdom – Information Commissioner’s Office (ICO)

- **Official Name:** Information Commissioner’s Office (ICO)
- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom
- **Telephone:** +44 (0)303 123 1113
- **Website:** <https://ico.org.uk>

16.2. South Africa – Information Regulator (South Africa)

- **Official Name:** Information Regulator (South Africa)
- **Address:** Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
- **Email:** enquiries@infoeregulator.org.za,
- PAIA complaints: PAIAComplaints@infoeregulator.org.za,
- POPIA complaints: POPIAComplaints@infoeregulator.org.za
- **Telephone:** +27 (0)10 023 5200; 0800 017 160
- **Website:** <https://infoeregulator.org.za>

17. Validity and Document Management

This document is valid as of July 2024.

The owner of this document is the Legal and Compliance Officer, who must check and, if necessary, update the document at least once a year.