

USE POLICIES: PRIVACY POLICY

THIS POLICY APPLIES TO ALL TRUDON PRODUCTS AND SERVICES INCLUDING PORTAL, PLATFORMS AND ELECTRONIC COMMUNICATIONS ENABLED FOR USE BY CUSTOMERS OR VISITORS TO OUR PORTAL AND/OR PLATFORMS

1. Our Commitment: Respecting and Protecting Your Privacy

Your privacy is important to us. Trudon respects and takes steps to protect the privacy of its visitors and Customers. We strive to take reasonable care of information we may receive from you.

2. The Scope of This Privacy Policy

This Privacy Policy addresses the privacy of visitors to Trudon's Portal (trudondigital.co.za), Platforms (website and social media) and/or Electronic Communication (communication facilities enabled for communication between Trudon and Customers and/or visitors being, SMS, Email, and Telephone). It identifies the type of data and information Trudon's Portal, Platforms and Electronic Communication collects from Customer and/or visitors, how we use and disclose it, and the steps we take to protect privacy.

3. What Information We Collect and How We Use It

Information We Collect:

Trudon collects personal information when you (a) register with our Portal and/or Platform; (b) communicate with us via Electronic Communication; or (c), when you use Trudon's Products and Services; (d) visit Trudon's Portal and/or Platforms or the pages of certain Trudon's business partners, Affiliates and/or Third Party Suppliers; and/or (e) enter promotions or sweepstakes.

We may, additionally, track non-personal information about your visit, including the domain name and the name of the Web page from which you entered Platforms, how much time you spend on each of our pages, and the IP address associated with your computer. We use this information to improve the performance and operation of our site.

When you register, we ask for information such as your name, e-mail address, birth date, gender, area code, occupation, industry, and personal interests. For subscription to our Products and/or Services, we may also ask for your address, ID number, and credit card information. Once you register with Trudon and Sign the Order Form, you are not anonymous to us and we protect your personal information (see Security below including our Use Rules and Security Policy).

Trudon collects information about your transactions with us and with some of our business partners, Affiliates, Third Party Suppliers, including information about your use of Products and Services that we offer.

Trudon automatically receives and records information on our server logs from your browser, including your IP address, Trudon's cookie information, and the page you request.

Trudon uses information for the following general purposes: (a) to customize the advertising and content you see; (b) fulfil your requests for Products and Services; (c) improve our services and (d) contact you, conduct research, and provide statistical reporting for internal and external clients and Customers.

4. **Your Ability to Edit Your Account Information and Preferences**

You can edit your Trudon Portal Account Information, including your marketing preferences, at any time. New categories of marketing communications may be added to the Marketing Preferences page from time to time. Users who visit this page can '**opt out**' of receiving future marketing communications from these new categories or they can '**unsubscribe**' by following instructions contained in the messages they receive. **We reserve the right to send you certain communications relating to our Products and/or Services, such as product or service announcements and administrative messages that are considered part of your Trudon Portal Account, without offering you the opportunity to 'opt-out' of receiving them or 'unsubscribe'.**

5. **Cookies and Related Technologies**

A cookie is a small file that is stored on the hard drive of your computer, ready for future access when you return to our site. We may use cookies to tailor and improve the content we deliver to you while you are on our site. The cookies do not contain or capture any personal information. You can configure your computer's browser to alert you when a site is attempting to send you a cookie, and then you can accept or refuse the cookie. Your decision to refuse cookies from Trudon's Portal and/or Platforms will not prevent you from using our Portal and/or Platforms but may limit your ability to take advantage of some of our advanced features.

On some of the pages on our Portal and/or Platforms, we may also use small bits of computer code called "one-pixel gifs," "clear gifs," or "Web beacons" embedded in Web pages to monitor the activity on our Portal and/or Platforms. Again, the technology does not capture or contain any personal information.

6. CHILDREN

Protecting the privacy of the very young is especially important. Trudon's Portal and/or Platforms are not designed to attract children under the age of 13 and our Portal and/or Platforms does not knowingly collect personal information from children on the aforesaid.

7. THIRD PARTY ADVERTISERS AND EXTERNAL LINKS

Some Trudon's Platforms may accept advertisements from third-party advertisers or provide links to external web sites. **Please check the privacy policy of these advertisers and sites for information regarding their collection of information and use of cookies. We are not responsible for the content or privacy practices of other web sites. Our business partners, Affiliates, Third Party Suppliers or advertisers may use third parties to serve or present the ads that appear on our Platforms. These third parties may place cookies on your browser when you visit our site. Any third-party cookies are subject to the privacy policy of the company placing them.**

8. INFORMATION WE DISCLOSE TO THIRD PARTIES

We may use aggregated information concerning how visitors use our Web site and share such information with third parties in order to improve our Portal, Platforms and/or Electronic Communications and to help us attract advertisers and listings. For example, we may share how many individuals visited our Portal and/or Platforms and on average how long they stayed on each page. Such use and sharing of aggregated information will not reveal any of your personal information to third parties.

Trudon does not rent, sell, disclose or share personal information about you with other people or non-affiliated companies except to provide Products or Services you've requested, when we have your permission, or under the following circumstances:

- a) We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- b) We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Portal, Platforms and/or Electronic Communication's terms of use, or as otherwise required by law;
- c) We transfer information about you if Trudon is acquired by or merged with another company. In this event, Trudon will notify you before information about you is transferred and becomes subject to a different privacy policy.

Trudon does not provide any personal information to the advertiser when you interact with or view an ad.

9. **SECURITY**

Trudon takes your security seriously and takes reasonable steps to protect your information. **No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of any firewalls or secure server software we may employ. Trudon continues to evaluate and implement enhancements in security technology and practices, however we can only take steps to help reduce the risks of unauthorized access. Trudon has taken the following steps in this regard:**

Secure Socket Layer (SSL)

Trudon uses SSL (Secure Socket Layer) encryption when transmitting certain kinds of information, such as registration information or payment information. An icon resembling a padlock is displayed on the bottom of most browsers window during SSL transactions that involve credit cards and other forms of payment. Any time Trudon asks you for a credit card number on Trudon for payment or for verification purposes, it will be SSL encrypted. The information you provide will be stored securely on our servers. Once you choose to store or enter your credit card number on Trudon, it will not be displayed back to you in its entirety when you retrieve or edit it in the future. Instead of the entire number, you will only see asterisks and either the first four digits or the last four digits of your number.

Secure Storage

Trudon maintains reasonable physical, electronic, and procedural safeguards that comply with federal regulations to protect personal information about you.

10. VENDORS AND BUSINESS PARTNERS

Trudon works with business s to protect the security and privacy of user information.

11. **EMPLOYEE AND CONTRACTOR ACCESS TO INFORMATION**

Trudon limits access to personal information about you to those employees who we reasonably believe need to come into contact with that information to provide products or services to you or in order to do their jobs.

12. **EDUCATION AND TRAINING FOR EMPLOYEES**

Trudon has implemented a company-wide education and training program about security that is required of every Trudon employee.

If Trudon learns of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using this Web site or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of this site. Trudon may post a notice on our Web site if a security breach occurs. If this happens, you will need a Web browser enabling you to view the Trudon Web site. Trudon may also send an e-mail to you at the e-mail address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving an electronic notice) you should notify us at ithelpdesk@yellowpages.co.za.

If you believe your Trudon Portal Account or any Customer Identifiers enabled for access to and use of our Products and/or Services has been compromised, please report the incident using our contact form. In the event that you believe that your personal safety is at risk or if you believe that you may be the victim of identity theft or other illegal conduct, please contact the appropriate federal, state or local law enforcement agencies directly.

13. **PRIVACY POLICY UPDATES**

This Privacy Policy supersedes and replaces all previously posted Privacy Policies.

Our Privacy Policy is regularly reviewed and revised to make sure we continue to serve the best interests of our customers. We reserve the right to update this Privacy Policy to reflect any changes. If we decide to change our Privacy Policy, we will post those changes to this Policy and other places we deem appropriate, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If the change would cause us to use or disclose personal information in a manner that is materially less restrictive from that stated at the time of collection, we will notify Web visitors before implementing the change.

14. Contacting Us: Questions, Comments, & Concerns:

Trudon will happily address any concerns about its online privacy practices and policies; please e-mail us at ithelpdesk@yellowpages.co.za.

To be removed from future Trudon marketing e-mail campaigns, please e-mail cancellations@yellowpages.co.za.

15. Display Advertising:

We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie unless we have robust notice of, and the user's or Customer's prior affirmative (i.e., 'opt-in') consent to, that merger.

The Google Analytics features we have implemented is based on Display Advertising (e.g., Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting).

Using the Ads Settings, visitors can '**opt-out**' of Google Analytics for Display Advertising and customize Google Display Network ads. We are encouraged to point visitors to Google Analytics' currently available 'opt-outs' for the web.

We use Remarketing with Google Analytics to advertise online.

Third-Party Service Providers, including Google, may show our ads on sites across the Internet.

We and Third Party Service Providers, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to our website.

We and Third Party Service Providers , including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site.

How we use data from Google's Interest-based advertising or 3rd-party audience data (such as age, gender, and interests) with Google Analytics.

Because laws across countries and territories vary, and because Google Analytics can be used in many ways, Google is unable to provide the exact language we need to include in our privacy policy. We understand the unique aspects and special considerations of our business, and our privacy policy should account for this information that only we can provide.