

TRUSTe

Privacy Policy

red24 is committed to protecting and respecting your privacy. Any personal information that you divulge when registering for, or using this website or our TravelTracker system, or in the course of requesting various products or services via this website, will only be used in accordance with this privacy statement. red24 plc includes both red24 Sales Limited and red24 CRM (Pty) Ltd (hereinafter referred to as "We", "Our" and "Us"). Details of our registered office addresses and VAT numbers are set out at the end of this document.

red24 CRM (Pty) Ltd has been awarded TRUSTe's Privacy Seal signifying that TRUSTe has reviewed this privacy policy and practices for compliance with **TRUSTe's program requirements** including transparency, accountability and choice regarding the collection and use of your personal information. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organisations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy policy or practices, please contact us at enquiries@red24.com. If you are not satisfied with our response you can contact **TRUSTe here**.

Please read the following policy carefully to understand our views and practices regarding your personal data and how we will treat it. This policy (together with our terms of website use located at <http://www.red24.com/legal/TOW.pdf> and any other documents referred to in it) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us.

For the purpose of the Data Protection Act 1998 ("the Act"), the data controller is red24 Sales Limited of The Coach House, Bill Hill Park, Twyford Road, Wokingham, Berkshire, RG40 5QT.

Information requirements - Website membership

We may collect, request and process the following data when you apply for membership to the red24 site or the red24 TravelTracker application:

- Information that you provide on our website <http://www.red24.com> or <http://tracker.red24.com>. This includes information provided at the time of registering to use our site, subscribing to our standard online services and may include:
 - Name
 - Organisation
 - Work email address
 - Telephone number

Information requirements - Electronic service requests

We may collect, request and process the following data when you make a specific request to red24:

- Information required to identify your request or issue.
- Information required to satisfy your request or issue.

We may also ask you to voluntarily complete a follow-up response to ensure that:

- Service requests have been fulfilled as per your expectations.
- Our service level delivery levels are consistent and acceptable.

Please note that if you contact us, we may keep a record of that correspondence for follow-up and archival purposes. Client service information is typically retained for up to 18 months.

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Web visitor statistics, IP address and cookies

We may collect statistical information about visitors to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise.

We may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service, such as to:

- Estimate our audience size and usage pattern.
- Store information about your preferences, and so allow us to customise our site according to your individual interests.
- Speed up your searches.
- Recognise you when you return to our site.

Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You may refuse to accept cookies by changing a setting on your browser. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website.

We use Google Analytics for our website www.red24.com. The purpose of this is to track activity on our various client web portals. This allows us to see which areas of the website are most visited and so require most attention in term of usability and accessibility. This enables us to provide usage statistics to our clients for various content pieces we publish and to assess suitability of content. No activity monitoring is tied to individual website users - only to client portals.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over those websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Personal data storage

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by personnel operating outside the EEA who work for us or for one of our vetted suppliers. Such personnel may be engaged in, among other things, the fulfillment of your order, the processing of your payment details and the provision of security and other services. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the security of information transmitted via the internet cannot be completely guaranteed. Although we will take all reasonable measures available to us to protect your personal data, we cannot

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guarantee the security of your data transmitted to our website; 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 unauthorised access.

Information usage

We use information held about you in the following ways:

- Internal record keeping.
- To improve our products and services.
- To ensure that content from our website is presented in the most effective manner for you and for your computer or to customise the website according to your interests.
- To provide you with information, send you our daily news emails, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our services.

Disclosure of your information

red24 CRM (Pty) Ltd does not share, sell, rent or trade your personal data with third parties other than as disclosed within this privacy policy.

We may disclose your personal information to third parties in the following circumstances:

- We use a third party email service provider to send out emails on our behalf. This third party is only allowed to use your personal information for the sole purpose of delivering emails on our behalf and not for their own promotional purposes.
- If red24 Sales Limited, or a substantial percentage of its assets, is acquired by a third party, and the personal data held by it about its customers is one of the transferred assets.
- We reserve the right to share your personal data as required by law and when we believe that disclosure is necessary to protect our rights and/or in order to comply with any legal obligation, judicial proceeding, court order, legal process served on our website, or in order to enforce or apply our terms of website use located at <http://www.red24.com/legal/TOW.pdf> or product terms and conditions located at <http://www.red24.com/legal/TC.pdf> and other agreements; or to protect our rights, property, or safety of our personnel, customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

If you believe that any information we are holding about you is incorrect or incomplete, please write to or email us as soon as possible, at the address below, or on enquiries@red24.com. We will promptly correct any erroneous or incomplete information.

Amendments

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If we decide to change our privacy practices, we will post those changes to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we change how we use your personally identifiable information, we will notify you here, by email, or by means of a notice on our home page.

This policy is effective from 01 November 2010.

Enquiries

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to enquiries@red24.com.

red24 Sales Limited, a wholly owned subsidiary of red24 plc The Coach House Bill Hill Park Wokingham Berkshire RG40 5QT Company Number: 4004496 Registered in England and Wales VAT Number: 823845027	red24 CRM (Pty) Ltd, a wholly owned subsidiary of red24 plc Greenwood Chartered Accountants 21 st Floor ABSA Centre Heerengracht Street Cape Town 8001 Company Number: 2002/012490/07 Registered in South Africa VAT Number: 4310205572
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