



SPEARGEN LIMITED PRIVACY POLICY

Last Revised: 31st August 2018

1. Scope of This Privacy Policy

This privacy policy only applies to speargen.com or speargen.biz, where a link to this privacy policy is provided (the “Websites”).

Speargen operates worldwide through subsidiary and affiliate companies. The Websites are controlled by Speargen Limited, unless a Website identifies (in its terms of use or otherwise) that it is controlled by another Speargen Limited entity.

Websites and specific web pages linked from speargen.com or speargen.biz may be subject to separate terms of use (including separate privacy policies). You must not provide Personal Information if you do not accept such terms of use.

Where links from our Websites are provided to non-speargen.com or non-speargen.biz websites, Speargen Limited is not responsible for those websites. The inclusion of a link to a third-party website does not imply endorsement of the linked site or service by us or our affiliates. These third-party websites will be governed by different terms of use (including privacy notices) and you are solely responsible for viewing and using each such website in accordance with the applicable terms of use. Speargen Limited is not responsible for how your Personal Information is handled by such third-party websites.

If you are a job applicant, please note that a separate privacy policy will apply to Personal Information collected through our job application portal. This can be viewed [here](#).

2. Cross-Border Transfer

The Websites are controlled and operated by us from South Africa and it is not intended that we will be subject to the laws or jurisdiction of any state, country or territory other than that of the South Africa. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Websites you consent to the transfer of information to countries outside of your country of residence, including South Africa, which may have data protection rules that are different from those of your country. We have established safeguards to protect Personal Information that is transferred to other countries, including appropriate contractual protections.

3. Personal Information We May Collect From You



"Personal Information" is information that identifies you as an individual or relates to an identifiable individual. Personal Information we may collect through our Websites includes:

- your name, postal address, email address, phone number, occupation and other contact information;
- information regarding your dealings with us;
- any interest you have in relation to our services or our practice areas; and
- any information you may voluntarily submit to us by completing any form on our Websites; and
- details of your visits to and usage of our Website.

We may collect Personal Information in various ways:

- from any form you may complete and submit through our Websites, for example information collected from the "Contact Us" page of our Websites;
- from the content of surveys that you may complete on our Websites;
- from session 'cookies' and other similar tools deployed on parts of our Websites that can only be accessed by authenticated users who are logged into the Website (for further information regarding cookies used on our Websites, please see Section 6 below)
- when you provide information as a client in connection with us providing professional services to you. Such information may be collected through speargen.com or speargen.biz when clients access Speargen Limited client links within this Website. Access will be subject to the terms of business we have with clients and any additional terms and conditions of use attached to those sites; and
- from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties.

4. How We May Use Your Personal Information

We may use Personal Information about you for our legitimate business interests, including the following:

- to facilitate your participation in interactive features you may choose to use on our Websites and personalise your experience on the Websites by presenting content tailored to you;
- to correspond with you, notify you of events or changes to our service, or otherwise to fulfill your requests and respond to your queries and requests for information, which may include marketing to you; and
- for the purposes of providing professional services to you via Speargen Limited applications; such services will be subject to additional terms and conditions of use including privacy;



- for our business purposes, such as data analysis, audits, fraud monitoring and prevention, and developing new products, enhancing, improving or modifying our Websites, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

5. Disclosure of Your Personal Information

Speargen Limited may disclose your Personal Information to any Speargen Limited affiliate company for the uses and purposes set out above. We may also disclose your Personal Information to third parties for the following reasons:

- to third party service providers such as entities providing customer service, email delivery, auditing, hosting our website and other services;
- to third parties involved with events that you register for, to facilitate your participation in those events;
- if we are obliged to disclose your Personal Information under applicable law or regulation, which may include laws outside your country of residence;
- in order to enforce or apply our Website terms of use, or to protect the rights, privacy, safety or property of Speargen Limited, our clients, affiliates or other parties;
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
- in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);
- in accordance with the separate terms and conditions of use that may attach to Speargen Limited website links.

6. Other Information We May Collect

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. Speargen Limited may collect Other Information in various ways.

For instance, when you visit our Websites, our server may record your IP address. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Websites. We may also derive your approximate location and company details from your IP address. Speargen Limited may also gather Other Information such as the type of your internet browser, your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and the name and version of the Websites you are using, which Willis Towers Watson uses to provide you with a more effective service.



Cookies: Additionally, when you visit our Websites, Speargen Limited may store a 'cookie' on the hard drive of your computer. Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usage of websites, such as time spent on the Websites, pages visited, language preferences, and other anonymous traffic data. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while using the Websites and to recognize your computer in order to assist your use of the Websites. We also gather statistical information about use of the Websites in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them.

You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, this may affect the functioning of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Websites. 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 or www.allaboutcookies.org.

Google Analytics: Our Websites use Google Analytics, which uses cookies and similar technologies to collect and analyse information about use of the Websites and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and you can opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Do Not Track signals: Please note that our Websites do not recognize or respond to any signal which your browser might transmit through the so-called 'Do Not Track' feature your browser might have. Enabling such feature on your browser will not necessarily affect the way in which our Websites operate, and if you wish to disable cookies on our Websites, you should not rely on any 'Do Not Track' feature your browser might have.

Pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Websites to, among other things, track the actions of users of the Websites (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Websites and response rates.

From you: Information such as your preferred means of communication is collected when you voluntarily provide it.



By aggregating information: Aggregated Personal Information does not personally identify you or any other user of the Websites (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

7. How We May Use and Disclose Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

8. Security

Speargen Limited maintains appropriate technical and organisational security measures to protect the security of your data against loss, misuse, unauthorised access, disclosure or alteration. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of our Websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us via support@speargen.com.

9. Choices and Access

You may opt out from receiving marketing-related emails from us on a going-forward basis by using the unsubscribe mechanism contained in each such email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

You may withdraw your consent to this privacy policy at any time by sending us an email at support@speargen.com. Please note that even if you withdraw your consent, we may still have the right or obligation under applicable law to collect, use, transfer or disclose Personal Information without your consent and we reserve the right to undertake that activity when appropriate.

If you would like to review, correct, update, suppress, or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending us an email at support@speargen.com.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request,



and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

10. Retention Period

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

11. Use of Websites By Minors

The Websites are not directed to individuals under the age of thirteen (13), and we request that they not provide Personal Information through the Websites.

12. Sensitive Information

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Websites.

13. Changes to Our Privacy Policy

From time to time, we may change our privacy policy. The effective date of this privacy policy, as indicated at the beginning of this privacy policy, indicates the last time this privacy policy was revised. Checking this effective date allows you to determine whether there have been changes since the last time you reviewed the policy. We will notify you of changes to this privacy policy by posting the revised privacy policy on our Websites. Your use of the Websites following these changes means that you accept the revised privacy policy.

14. Contact & Comments

If you have any questions or comments regarding this privacy policy, please contact us via support@speargen.com.

We do not accept requests via the telephone or by facsimile. We are not responsible for notices that are not labelled or sent properly, or do not have complete information.



SPEARGEN
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隱私政策

最後修訂日期：2018 年 8 月 31 日

1. 本隱私政策的範圍

本隱私政策僅適用於 speargen.com 或 speargen.biz，其中提供了本隱私政策的鏈接（“網站”）。

Speargen 通過子公司和附屬公司在全球開展業務。本網站由 Speargen Limited 控制，除非網站（在其使用條款或其他方面）確定其由另一個 Speargen Limited 實體控制。

從 speargen.com 或 speargen.biz 鏈接的網站和特定網頁可能受單獨的使用條款（包括單獨的隱私政策）約束。如果您不接受此類使用條款，則不得提供個人信息。

如果我們的網站鏈接提供給 nonspeargen.com 或 nonspeargen.biz 網站，Speargen Limited 不對這些網站負責。包含指向第三方網站的鏈接並不意味著我們或我們的關聯公司對鏈接網站或服務的認可。這些第三方網站將受不同的使用條款（包括隱私聲明）管轄，您自行負責根據適用的使用條款查看和使用每個此類網站。Speargen Limited 不對此類第三方網站如何處理您的個人信息負責。

如果您是求職者，請注意單獨的隱私政策將適用於通過我們的求職申請門戶網站收集的個人信息。這可以在這裡查看。

2. 跨境轉移

本網站由我們從南非控制和運營，並不意味著我們將受到除南非之外的任何州，國家或地區的法律或管轄。您的個人信息可以在我們擁有設施或我們與服務提供商合作的任何國家/地區進行存儲和處理，並且您使用本網站即表示您同意將信息傳輸到您所在國家/地區以外的國家/地區，包括南非，擁有與您所在國家/地區不同的數據保護規則。我們已製定保護措施，以保護轉移到其他國家/地區的個人信息，包括適當的合同保護。



3.我們可能收集的個人信息

“個人信息”是指將您識別為個人或與可識別個人相關的信息。我們可能通過我們的網站收集的個人信息包括：

- 您的姓名，郵寄地址，電子郵件地址，電話號碼，職業和其他聯繫信息；
- 有關您與我們交易的信息；
- 您對我們的服務或我們的業務領域的任何興趣；和
- 您可以通過在我們的網站上填寫任何表格自願提交給我們的任何信息；和
- 您訪問和使用我們網站的詳細信息。

我們可能以各種方式收集個人信息：

- 您可以通過我們的網站完成和提交的任何表格，例如從我們網站的“聯繫我們”頁面收集的信息；
- 您可以在我們的網站上完成的調查內容；
- 部分網站上部署的會話‘小型文本文件’和其他類似工具只能由登錄網站的經過身份驗證的用戶訪問（有關我們網站上使用的小型文本文件的更多信息，請參閱下面的第 6 節）
- 當您提供與我們有關的客戶信息時，為您提供專業服務。當客戶訪問本網站內的 Speargen Limited 客戶鏈接時，可通過 speargen.com 或 speargen.biz 收集此類信息。訪問權限取決於我們與客戶的業務條款以及附加到這些網站的任何其他使用條款和條件；和
- 來自其他來源，例如公共數據庫，聯合營銷合作夥伴，社交媒體平台（包括與您成為朋友或以其他方式連接的人）和其他第三方。

4.我們如何使用您的個人信息

我們可能會將您的個人信息用於我們的合法商業利益，包括以下內容：

- 為了方便您參與我們可以選擇在我們的網站上使用的互動功能，並通過展示為您量身定制的內容，個性化您在網站上的體驗；
- 與您通信，通知您有關我們服務的事件或變更，或以其他方式滿足您的請求並回復您的查詢和信息請求，其中可能包括向您推銷；和
- 為了通過 Speargen Limited 應用程序為您提供專業服務；此類服務將受到附加條款和條件的約束，包括隱私；



- 用於我們的業務目的，例如數據分析，審計，欺詐監控和預防，開發新產品，增強，改進或修改我們的網站，識別使用趨勢，確定促銷活動的有效性以及運營和擴展我們的業務活動。

5.披露您的個人信息

Speargen Limited 可能會向任何 Speargen Limited 關聯公司披露您的個人信息，以用於上述用途和目的。我們還可能出於以下原因向第三方披露您的個人信息：

- 第三方服務提供商，例如提供客戶服務，電子郵件遞送，審計，託管我們網站和其他服務的實體；
- 參與您註冊的活動的第三方，以促進您參與這些活動；
- 如果我們有義務根據適用法律或法規披露您的個人信息，其中可能包括您所在國家/地區以外的法律；
- 為了執行或應用我們的網站使用條款，或保護 Speargen Limited，我們的客戶，附屬機構或其他方的權利，隱私，安全或財產；
- 回應法院，執法機構，監管機構以及其他公共和政府機構的請求，這些機構可能包括您所在國家以外的此類機構；
- 如果我們的業務，資產或股票的全部或任何部分（包括與任何破產或類似程序有關的）進行任何重組，合併，出售，合資，分配，轉讓或其他處置；
- 根據 Speargen Limited 網站鏈接可能附帶的單獨使用條款和條件。

6.我們可能收集的其他信息

“其他信息”是指未透露您的特定身份或與可識別個人無直接關係的任何信息。 Speargen Limited 可能以各種方式收集其他信息。

例如，當您訪問我們的網站時，我們的服務器可能會記錄您的 IP 地址。我們使用 IP 地址來計算使用級別，診斷服務器問題和管理網站。我們還可能從您的 IP 地址中獲取您的大致位置和公司詳細信息。 Speargen Limited 還可能收集其他信息，例如您的互聯網瀏覽器類型，媒體訪問控制（MAC）地址，計算機類型（微軟視窗或蘋果視窗），屏幕分辨率，操作系統名稱和版本，設備製造商和型號，語言和 您正在使用的網站的名稱和版本，Willis Towers Watson 使用這些網站為您提供更有效的服務。



小型文本文件：此外，當您訪問我們的網站時，Speargen Limited 可能會在您的計算機硬盤上存儲“小型文本文件”。是網站傳輸給您的在硬盤存儲，有時收集有關您使用網站的信息，例如在網站上花費的時間，訪問過的頁面，語言首選項和其他匿名流量數據。我們出於安全目的使用這些信息，便於導航，更有效地顯示信息，在使用網站時個性化您的體驗並識別您的計算機以幫助您使用網站。我們還收集有關網站使用情況的統計信息，以便不斷改進其設計和功能，了解它們的使用方式，並協助我們解決有關它們的問題。

您可以通過更改瀏覽器設置來控制使用小型文本文件的方式。您可以通過激活允許您拒絕小型文本文件的瀏覽器設置來拒絕接受小型文本文件。但是，如果您選擇此類設置，則可能會影響我們網站的運行。除非您已調整瀏覽器設置以拒絕小型文本文件，否則我們的系統將在您訪問或登錄我們的網站時發出小型文本文件。要了解有關小型文本文件的更多信息，包括如何查看已設置的小型文本文件以及如何管理和刪除它們，請訪問 www.aboutcookies.org 或 www.allaboutcookies.org。

谷歌 Analytics：我們的網站使用谷歌 Analytics，它使用小型文本文件和類似技術收集和分析有關網站使用情況的信息，並報告活動和趨勢。此服務還可能收集有關其他網站，應用程序和在線資源使用的信息。您可以訪問 www.google.com/policies/privacy/partners/ 了解谷歌的做法，也可以通過下載 <https://tools.google.com/dlpage/gaoptout> 停用瀏覽器插件來選擇退出這些做法。

不跟蹤信號：請注意，我們的網站無法識別或回應您的瀏覽器可能通過您的瀏覽器可能具有的所謂“請勿跟蹤”功能傳輸的任何信號。在瀏覽器上啟用此類功能不一定會影響我們網站的運行方式，如果您希望在我們的網站上禁用小型文本文件，則不應依賴瀏覽器可能具有的任何“請勿跟蹤”功能。

像素標籤和其他類似技術：像素標籤（也稱為網絡信標和清晰 GIF）可以與某些網站結合使用，以跟蹤網站用戶（包括電子郵件收件人）的行為，衡量成功與否 我們的營銷活動和編制有關網站使用情況和回復率的統計數據。

來自您：當您自願提供信息時，會收集您首選的溝通方式等信息。

通過匯總信息：匯總的個人信息不會識別您或網站的任何其他用戶（例如，我們可能匯總個人信息以計算具有特定電話區號的用戶的百分比）。



7.我們如何使用和披露其他信息

我們可以出於任何目的使用和披露其他信息，除非我們根據適用法律要求另行提供。在某些情況下，我們可能會將其他信息與個人信息相結合（例如將您的姓名與您的位置相結合）。如果我們這樣做，我們會將合併後的信息視為個人信息，只要它合併即可。

8.安全

Speargen Limited 維護適當的技術和組織安全措施，以保護您的數據安全，防止丟失，濫用，未經授權的訪問，披露或更改。儘管如此，通過互聯網傳輸信息的安全性並不總能得到保證，您在訪問和使用我們的網站時也會承認這一點。如果您有理由相信您與我們的互動不再安全（例如，如果您認為自己的帳戶安全性受到損害），請立即通過 support@speargen.com 通知我們。

9.選擇和訪問

您可以使用每封此類電子郵件中包含的取消訂閱機制，選擇不再接收來自我們的與營銷相關的電子郵件。我們會盡快在合理可行的情況下盡快遵守您的要求。請注意，如果您選擇不接收我們的營銷相關電子郵件，我們仍可能會向您發送重要的管理消息，您無法選擇退出。

您可以隨時通過 support@speargen.com 向我們發送電子郵件，撤銷您對本隱私政策的同意。請注意，即使您撤銷了您的同意，我們仍有權根據適用法律在未經您同意的情況下收集，使用，轉讓或披露個人信息，我們保留在適當時進行該活動的權利。

如果您想查看，更正，更新，禁止或限制處理您的個人信息或索取有關您的個人信息的副本，您可以發送電子郵件至 support@speargen.com 與我們聯繫。

在您的請求中，請說明您希望更改哪些個人信息，是否要從我們的數據庫中刪除您的個人信息，或者讓我們知道您希望我們使用您的個人信息有哪些限制。為了保護您的利益，我們只能針對與您向我們發送請求的特定電子郵件地址相關的個人信息實施請求，我們可能需要在實施您的請求之前驗證您的身份。我們會盡快在合理可行的情況下盡力遵守您的要求。

請注意，我們可能需要保留某些信息以用於記錄目的和/或完成您在請求更改或刪除之前開始的任何交易。可能還有剩餘信息將保留在我們的數據庫和其他記錄中，不會被刪除。



10.保留期

除非法律要求或允許更長的保留期，否則我們將在完成本隱私政策中列出的目的所需的時間內保留您的個人信息。

11.未成年人網站的使用

本網站不針對十三（13）歲以下的個人，我們要求他們不通過網站提供個人信息。

12.敏感信息

我們要求您不要向我們發送任何敏感的個人信息（例如，社會安全號碼，與種族或民族血統有關的信息，政治觀點，宗教或其他信仰，健康，生物識別或遺傳特徵，犯罪背景或工會會員資格）通過網站或通過網站。

13.我們隱私政策的變更

我們可能會不時更改我們的隱私政策。本隱私政策開始時，本隱私政策的生效日期表示本隱私政策最後一次修訂。通過檢查此生效日期，您可以確定自上次查看策略後是否有更改。我們將通過在我們的網站上發布修訂後的隱私政策來通知您本隱私政策的變更。您在遵循這些變更後使用本網站意味著您接受修訂後的隱私政策。

14.聯繫和評論

如果您對本隱私政策有任何疑問或意見，請通過 support@speargen.com 與我們聯繫。

我們不接受通過電話或傳真的請求。對於未標記或未正確發送或沒有完整信息的通知，我們概不負責。