

DATA

PRIVACY POLICY



2025



## INTRODUCTION

At Wetpaint Advertising, we prioritize the privacy and security of personal information. Our commitment to protecting this information is in full compliance with the Protection of Personal Information Act (POPIA) and other relevant South African laws. This policy sets forth clear guidelines for managing personal data within our organization and outlines our responsibilities when interacting with external parties.

## 1. INTERNAL DATA PRIVACY MANAGEMENT

### 1.1 Purpose

Our aim is to safeguard the integrity and confidentiality of personal information processed within Wetpaint Advertising, ensuring compliance with both legal and ethical standards.

### 1.2 Scope

This policy applies to all employees, contractors, and individuals who have access to personal information managed by Wetpaint Advertising.

### 1.3 Data Collection

Types of Data Collected:

Personal information includes, but is not limited to:

- Employee records (names, contact details, identification numbers)
- Client data (names, addresses, billing information)
- Sensitive information (health data, racial or ethnic origin etc.)

### 1.4 Collection Methods:

Data is collected through forms, online applications, contracts, and direct communication. We ensure that explicit consent is obtained before collecting any sensitive information.

### 1.5 Data Use

Personal information is utilised solely for:

- Employment purposes (recruitment, payroll, performance evaluation)
- Client relationship management (marketing, communication, service delivery)

### Access Control:

Access to personal data is strictly limited to authorized personnel based on their job requirements eg. Employee information access is limited to the CEO, Director and Human Resources.

### 1.6 Data Retention

#### Retention Period:

We retain personal information only as long as necessary to fulfill the purpose for which it was collected or as required by law.

#### Secure Disposal:

When retention is no longer necessary, personal information will be securely destroyed through methods such as data wiping, shredding, or secure deletion.

## 1.7 Data Security

### Technical Measures:

- Encryption: All sensitive data will be encrypted during storage and transmission.
- Firewalls and Anti-virus Software: We utilize regularly updated security software to protect data from unauthorized access.

### Organizational Measures:

- Access Logs: We maintain logs of data access and modifications for audit purposes.
- POPIA and PAIA policies are in place at Wetpaint Advertising which employees are trained on during induction and annual refresher training is held.

## 1.8 Employee Training

### Regular Training:

All employees will receive annual training on POPIA (Protection of Personal Information Act) and PAIA (Promotion of Access to Information Act), internal policies, and best practices for data handling.

## 1.9 Incident Response

### Breach Reporting:

Employees must promptly report any suspected data breaches to their line manager and Human Resources.

### Response Plan:

- Containment and assessment of the breach
- Notification procedures for affected individuals
- Review and update of security measures post-incident

## 2. EXTERNAL DATA PRIVACY MANAGEMENT

### 2.1 Purpose

Our goal is to manage personal information shared with external parties responsibly and in compliance with applicable laws.

### 2.2 Scope

This section covers all interactions with external parties, including clients, vendors, and any third-party service providers handling personal data on behalf of Wetpaint Advertising.

### 2.3 Data Sharing

#### Conditions for Sharing:

Personal data may only be shared with external parties when:

- Explicit consent is obtained from the individual
- Sharing is necessary for the performance of a contract
- Legally mandated

## 2.4 Data Processing by Third Parties

### Due Diligence:

Wetpaint Advertising takes reasonable steps to ensure that third party service providers handling personal data align with applicable data protection standards. This includes limiting the sharing of personal data to only what is necessary for delivery.

### Third- Party Expectations:

Wetpaint Advertising expects third-party service providers to:

- Adhere to applicable data protection laws, including POPIA.
- Implement appropriate security measures to safeguard personal information.
- Notify Wetpaint Advertising in the event of a data breach or security incident involving shared data.

## 2.5 Data Transfer

### Cross-Border Transfers:

Personal information may only be transferred outside South Africa if:

- The recipient country has adequate data protection laws
- Appropriate safeguards (e.g., standard contractual clauses) are in place

## 2.6 Information Security

All external parties must implement robust security measures to protect personal information, including:

- Encryption
- Access controls
- Regular security audits

## 2.7 Incident Management

### Breach Notification:

Third parties must immediately notify Wetpaint Advertising upon discovering any data breach affecting our data.

### Mitigation Measures:

External parties are required to cooperate fully in any investigations and remediation efforts.

## 3. Advertising-Specific Data Management

### 3.1 Purpose

This section establishes guidelines for the responsible handling of personal data in marketing and advertising practices while ensuring compliance with data privacy laws.

### 3.2 Data Collection for Marketing

#### Consent for Marketing:

We obtain explicit consent from individuals before collecting personal data for marketing purposes, including email addresses, demographic information, and preferences.

#### Transparency:

We clearly inform individuals about how their data will be used in advertising campaigns, including targeted advertising and analytics.

### 3.3 Data Usage in Advertising

**Targeted Advertising:**

We utilize personal information for targeted advertising only when consent has been obtained. Our marketing practices comply with POPIA and the Consumer Protection Act (CPA).

**Data Segmentation:**

Methods to segment data for more effective marketing will be implemented, ensuring all segments adhere to privacy regulations.

### 3.4 Data Analytics and Tracking

**Use of Cookies and Tracking Technologies:**

We clearly inform users about the use of cookies and similar tracking technologies on our websites and apps. Consent is obtained where necessary.

**Data Anonymization:**

Where possible, we anonymize personal data used for analytics to protect individual identities while still gaining insights.

### 3.5 Campaign Performance Reporting

**Reporting Practices:**

When sharing performance reports with clients that include personal data, we ensure that:

- Data is aggregated or anonymized to protect individual privacy.
- Reports comply with client contracts and data protection laws.

### 3.6 Ethical Advertising Practices

**Avoiding Discrimination:**

We ensure that our advertising practices do not discriminate against individuals based on personal information, such as race, gender, or socioeconomic status.

**Responsible Messaging:**

We are transparent about data usage in campaigns and avoid misleading advertising practices.

## 4. Client Relationships and Data Management

### 4.1 Client Data Protection

**Data Ownership:**

Wetpaint Advertising acknowledges that clients retain ownership of their data and respects their rights regarding personal information used in campaigns.

**Client Responsibilities:**

Wetpaint Advertising works collaboratively with clients to uphold data privacy standards. While clients provide the necessary personal data for campaigns, Wetpaint takes reasonable steps to handle this data responsibly and in accordance with applicable data protection laws (eg. POPIA). Clients are encouraged to ensure that any data shared aligns with legal requirements, and Wetpaint supports compliance through responsible data processing practices.



## 4.2 Client Consent Management

### **Managing Consent:**

While clients provide the necessary permissions for data use, Wetpaint takes reasonable steps to handle this data responsibly and in accordance with applicable privacy laws.

Wetpaint does not operate a formal consent management system but follows best practices in handling client-provided data responsibly

At Wetpaint Advertising, we are committed to maintaining the highest standards of data privacy and security. This policy is essential for protecting the personal information of our employees, clients, and partners. We will review this policy annually or whenever significant changes occur in relevant legislation or organizational practices.