CMVAS My Wi-Fi Mobile Application Privacy Policy

**What is covered by this Privacy Policy**

My Wi-Fi is an application developed by CMVAS for use by subscribers who purchase cloud and software services from CMVAS. CMVAS is a processor of subscriber personal information under applicable privacy and data protection laws.

**Privacy Policy applies for any use of the App**

This Privacy Policy applies to the App described in the My Wi-Fi Mobile Application End User License Agreement (the “**Agreement**”). Please read this Privacy Policy carefully to understand how information collected by the App will be treated. If you do not agree with this Privacy Policy, you should not install, use, or access the App.

**Children Information**

The App is not intended for children under the age, CMVAS does not knowingly collect personal data of children, without parental consent. If CMVAS learns that personal data from a child under the age has been obtained or received without verification of parental consent, CMVAS will delete that information.

**How CMVAS Collects Your Information**

CMVAS collects and processes information provided directly by you when you install the App and register for an account to use the App. Specifically, this information includes:

* Your name, email address, password/pin, preferred language, and your account number;
* Information about the equipment deployed at your premises that you choose to connect to the App such as the MAC address, serial number or other unique identifier for your router;
* Data insights CMVAS attains based on correlation and analytics of your information collected in providing the App, and user-associated analytics to improve the quality of the app experience.

**How CMVAS Uses the Information**

CMVAS uses the information collected as described in this Privacy Policy, to:

* Provide you with the App and the Services/notifications provided through the App as described in the Agreement;
* Implement, improve and/or enhance the App or to provide App features, including to make future releases available to you;
* Carry out CMVAS’s obligations as described or authorized in the Agreement, and this Privacy Policy;
* Enforce CMVAS’s rights arising from the Agreement between you and CMVAS; and
* Fulfil any other purpose authorized by you and reasonably required for the App.

CMVAS may also use the information collected as described in this Privacy Policy, to inform you about goods and services that may be of interest to you.

**Disclosure of Information**

CMVAS does not sell or otherwise distribute or disclose your information to third parties other than as described or authorized in the Agreement, including this Privacy Policy.

CMVAS discloses the information to its subsidiaries, affiliates and certain third-party vendors and contractors that provide development, integration, web hosting and consulting services to CMVAS to provide you with the App, to maintain, support, develop, improve and/or enhance the App and to fulfil CMVAS obligations associated with the App.

CMVAS may be required to disclose information under certain circumstances:

* To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
* To enforce CMVAS’s rights arising from the Agreement entered into between you and CMVAS;
* If CMVAS believes disclosure is necessary or appropriate to protect the rights, property, or safety of CMVAS, its customers or other third parties; or
* To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of CMVAS’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which your information and/or your subscriber information held by CMVAS are among the assets transferred.

**Your Choices About Our Collection, Use, and Disclosure of Information**

The provision of the information described in this Privacy Policy is necessary for you to use the App.

Your information is retained and used as described in this Privacy Policy. If you delete your account for the App in accordance with the terms of the Agreement, your information will be deleted within 30 days of the deletion of such account or within such other timeline as may be mandated by applicable law. You will no longer be able to access the App when your account is deleted.

**Accessing and Correcting Information**

You can (a) access and review your contact information, and (b) correct your contact information, by logging into the App and visiting the settings page. To access, review or correct any other information, please contact us.

**Data Security**

All information you provide to us is stored on our secure servers behind firewalls. CMVAS utilizes mechanisms such as intrusion detection systems, intrusion prevention systems, firewalls and encryption to secure information from accidental loss and from unauthorized access, use, alteration, and disclosure.

CMVAS deploys Intrusion Detection Systems (IDS) and Intrusion Prevention Systems (IPS) to alert and proactively contain potential threats. Enhanced security visibility and coverage is enabled through added layers of firewall and IDS beyond the network perimeter. Management connections to servers are always authenticated and encrypted via Secure Shell (SSH) when administration access is required for troubleshooting, patch management, and upgrades.

CMVAS runs automated vulnerability scanning on all perimeter systems to identify potential security risks. Scanning applications are regularly updated to remain current and up to date on important security vulnerabilities. Patches are applied to all relevant systems unless a compensating control is implemented.

CMVAS uses a variety of industry-standard security technologies and best practices to help protect information from unauthorized access, use, or disclosure. All data stored on the CMVAS systems is encrypted following industry standards using the strongest keys and ciphers. All communications with the App are protected with industry standard security protocols.

You control access to your account. You must keep your login credentials and passwords secure and protected and maintained as confidential. CMVAS is not responsible for any circumvention of any privacy settings or security measures provided.

**Changes to this Privacy Policy**

The date the Privacy Policy was last revised is identified at the end of this Privacy Policy. You are responsible for periodically visiting this Privacy Policy to check for any changes.

**Contact Information**

For any queries in relation to this letter or our processing of your personal information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Name: Zauna Visser

Contact Number: 0861 112 333

Email Address: zauna@cmvas.co.za

Physical Address: 49 Galaxy Avenue, Linbro Park, Sandton, 2091

Last Updated: June 2024