

# Easy Systems

## Privacy Policy

*Easy Systems / EasyQuote websites, software, services and support*

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### 1. Introduction and scope

This Privacy Policy explains how Easy Systems / EasyQuote, being Kinsey Computers CC t/a Easy Systems, collects, uses, stores, discloses, protects and otherwise processes personal information in connection with its websites, software products, portals, applications, dashboards, APIs, integrations, support services, communication services, EasyQuote, EasyWhats and related services.

This Privacy Policy is intended to supplement, expand and replace the previous website-only privacy statement. It applies to website visitors, prospective customers, Customers, Authorised Users, support contacts, suppliers, End Users and other persons whose personal information may be processed through or in connection with the services.

Easy Systems is committed to processing personal information lawfully, reasonably and securely, including in accordance with POPIA where applicable.

### 2. Key terminology: Easy Systems, Customers, Authorised Users and End Users

"Easy Systems", "EasyQuote", "EasyWhats", "we", "us" or "our" means Kinsey Computers CC t/a Easy Systems, including its EasyQuote, EasyWhats and related software, websites, portals, applications, APIs, integrations, hosting, support and technology services.

"Customer" or "Client" means the business, dealership, organisation, company, close corporation, sole proprietor or other entity that contracts with, subscribes to, pays for, accesses or uses the software or services supplied by Easy Systems. A Customer is Easy Systems' direct commercial customer.

"Authorised User" means a person authorised by a Customer to access or use the software on that Customer's behalf, such as the Customer's staff, managers, sales executives, administrators, contractors or agents.

"End User" means a person whose information is collected, captured, uploaded, stored, sent, received, viewed, updated, exported or otherwise processed by or on behalf of a Customer through the software. End Users may include a dealership's own customers, prospective customers, leads, WhatsApp contacts, Facebook leads, vehicle buyers, service customers, suppliers, staff members, website visitors or other data subjects.

An End User is not automatically Easy Systems' customer merely because the End User's information is processed through the software. In many cases, the End User has a direct relationship with the Customer, and Easy Systems only provides the software platform used by that Customer.

"Customer Data" means information processed in or through the software by or on behalf of a Customer, including End User personal information. "Easy Systems Data" means information Easy Systems processes for its own business purposes, such as website enquiries, demo requests, sales enquiries, account administration, billing, support, security, compliance, marketing, product improvement and supplier administration.

### 3. Important role clarification: responsible party and operator

Easy Systems / EasyQuote is primarily a software and technology service provider to its Customers. The Customer normally decides why and how Customer Data and End User personal information is collected and used in the Customer's business.

For Customer Data and End User personal information processed through the software for the Customer's own business purposes, the Customer is generally the responsible party / data controller under applicable privacy law, and Easy Systems generally acts as the Customer's operator / data processor.

When Easy Systems acts as operator / data processor, it processes Customer Data and End User personal information on the Customer's behalf to provide, host, support, secure, maintain and improve the software, and to comply with lawful instructions and applicable legal obligations.

Where Easy Systems processes Easy Systems Data for its own purposes, including website enquiries, demo requests, account administration, billing, marketing, security, support, legal compliance and service improvement, Easy Systems may act as the responsible party / data controller for that processing.

#### **4. Customer responsibility for personal information and misuse**

Customers are responsible for the Customer Data and End User personal information they enter into, upload to, transmit through, store in, send from, export from or otherwise process using the software. This includes responsibility for the accuracy, legality, consent status, lawful basis, retention, use, sharing, deletion and marketing use of such information.

Easy Systems / EasyQuote does not independently verify whether each Customer has obtained the required consent, lawful basis, authorisation, opt-in or other permission before using the software to process, communicate with or market to any End User or other person.

Easy Systems / EasyQuote cannot guarantee that Customers or Authorised Users will not misuse the software, breach the Terms of Use, process personal information unlawfully, send unlawful communications, ignore opt-outs, or otherwise act outside the scope of their legal obligations.

To the maximum extent permitted by law, Easy Systems / EasyQuote is not responsible for the unlawful, unauthorised, fraudulent, negligent, misleading, abusive or non-compliant processing of Customer Data or End User personal information by Customers, dealerships, Authorised Users, employees, contractors, agents or third parties using the software.

#### **5. Personal information we may collect**

Depending on the services used and the context, Easy Systems may collect or process categories of personal information including:

- identity and contact details, such as name, surname, company, dealership, role, email address, telephone number and address;
- account and Authorised User details, such as usernames, permissions, user activity, audit history and access records;
- website and device information, such as IP address, browser type, domain names, access times, referring website addresses, cookies and usage information;
- Customer Data, End User records, lead records and dealership records processed through EasyQuote or related systems;
- WhatsApp, Facebook Lead Ads and messaging information processed through EasyWhats, including phone numbers, message metadata, message content, templates, opt-in / opt-out information and lead details where applicable;
- vehicle, quote, invoice, stock, service, job card, document, communication and integration data where processed through the relevant software;
- support, billing, payment, correspondence, call, email, ticket and troubleshooting information;
- logs, security records, audit records, backup records, API logs, webhook logs and integration records.

#### **6. How we collect personal information**

We may collect personal information directly from you, from Customers who use our software, from authorised users, from website forms, demo requests, support requests, email or WhatsApp communications, telephone calls, online meetings, integration connections, imported records, APIs, webhook endpoints, cookies, logs, Third-Party Services and publicly available sources where lawful.

## 7. Purposes for processing personal information

Easy Systems may process personal information for purposes including:

- providing, operating, hosting, supporting, maintaining and improving the services;
- responding to enquiries, demo requests, support requests and Customer communications;
- creating and managing Customer accounts, Authorised Users, permissions and access credentials;
- processing leads, messages, quotes, dealership records, integrations, Customer Data and End User personal information as instructed by Customers;
- billing, invoicing, collections, accounting, tax and contract administration;
- security, fraud prevention, abuse monitoring, troubleshooting, audit logging and system monitoring;
- complying with law, legal process, regulatory requirements and contractual obligations;
- protecting the rights, property, systems and safety of Easy Systems, Customers, Authorised Users, End Users and the public;
- sending administrative notices, product updates, service messages and lawful marketing communications.

## 8. Lawful basis for processing

Easy Systems processes personal information where there is a lawful basis to do so, including where processing is necessary to provide services, perform or enter into a contract, comply with legal obligations, protect legitimate business interests, improve and secure services, respond to enquiries, provide support, prevent fraud or abuse, or where consent has been obtained where required.

Where Customer is the responsible party, Customer is responsible for identifying and maintaining the lawful basis for processing its own Customer Data and End User personal information through the Service.

## 9. Direct marketing and communications

Easy Systems may use contact details to send service communications, administrative notices, support messages, product updates and, where lawful, marketing communications relating to Easy Systems / EasyQuote products and services.

Electronic direct marketing will be handled in accordance with applicable law. Recipients may opt out of marketing communications using the unsubscribe or opt-out mechanism provided or by contacting Easy Systems. Customer remains responsible for marketing messages sent by Customer through the software, including WhatsApp, SMS, email or other channels.

## 10. Cookies and similar technologies

Easy Systems websites and services may use cookies and similar technologies to operate websites, remember preferences, improve user experience, maintain sessions, secure accounts, analyse usage and support service functionality. Most browsers allow users to refuse or delete cookies, but some features may not work properly if cookies are disabled.

## 11. Sharing personal information

Easy Systems does not sell, rent or lease customer lists to third parties. We may share personal information where reasonably necessary with:

- employees, contractors and service providers who need the information to provide or support the services;
- hosting, cloud, backup, monitoring, email, SMS, WhatsApp, telecommunications, payment, accounting, analytics, support and remote-access providers;
- Meta Platforms, WhatsApp, Facebook and other Third-Party Services where required for integrations or platform compliance;
- Customers, where Easy Systems processes personal information on that Customer's behalf or where a request relates to Customer Data or End User personal information controlled by that Customer;
- professional advisers, auditors, insurers, legal representatives and debt-collection providers;
- regulators, law enforcement, courts or other authorities where required or permitted by law;
- third parties in connection with business restructuring, sale, merger or transfer, subject to appropriate safeguards where required.

## 12. Third-party services and subprocessors

The services may depend on or integrate with third-party providers, including hosting providers, cloud infrastructure providers, backup providers, telecommunications providers, email/SMS/WhatsApp providers, Meta Platforms, Facebook Lead Ads, accounting integration providers, analytics providers, monitoring providers, payment/billing providers, support providers and remote-support providers.

These providers may process personal information as operators, processors, independent responsible parties/controllers or service providers, depending on the context. Easy Systems will take reasonable steps to use providers that are appropriate for the relevant processing activity.

## 13. Cross-border transfers

Personal information may be processed or stored in South Africa or in other countries where Easy Systems, its customers, hosting providers, cloud providers, subprocessors, Third-Party Services or integration providers operate. Where required by law, Easy Systems will take reasonable steps to ensure that appropriate safeguards apply to cross-border processing.

## 14. Security

Easy Systems takes reasonable technical and organisational measures to protect personal information against loss, unauthorised access, unauthorised disclosure, misuse, alteration and destruction. These measures may include access controls, secure hosting, backups, logging, staff controls, confidentiality obligations, system monitoring and other appropriate safeguards.

No system, software, network, hosting environment or communication channel can be guaranteed to be completely secure. Customers and users must also maintain appropriate security controls on their own systems, devices, accounts and user access.

## 15. Security compromise and incident handling

If Easy Systems becomes aware of a confirmed security compromise affecting personal information under its control, it will take reasonable steps to investigate, contain and remediate the incident.

Where Easy Systems acts as operator for a Customer, Easy Systems will notify the customer as soon as reasonably practicable after becoming aware of a confirmed security compromise affecting Customer Data under Easy Systems' control. The customer remains responsible for assessing and making any notifications to the Information Regulator and affected data subjects where required by POPIA, except where the law requires Easy Systems to notify directly.

Where Easy Systems acts as responsible party, Easy Systems will assess whether notifications to the Information Regulator and/or affected data subjects are required by law.

## 16. Retention of personal information

Easy Systems keeps personal information only for as long as reasonably necessary for the purposes for which it was collected or processed, unless a longer retention period is required or permitted by law, contract, accounting requirements, tax requirements, security needs, audit requirements, dispute resolution, fraud prevention, backup cycles or legitimate operational needs.

Retention periods may differ depending on the category of information, including website enquiries, demo requests, Customer account records, billing records, support tickets, Customer Data, leads, WhatsApp messages, Facebook leads, integration logs, audit logs, security logs, backups and legal records.

Backup copies, logs, audit records and system records may remain for a reasonable period after deletion or termination where required for legal, security, accounting, dispute-resolution, fraud-prevention, audit or operational purposes.

## 17. Data subject rights

Subject to applicable law and verification of identity, data subjects may have rights to request access to personal information, request correction or deletion of personal information, object to certain processing, withdraw consent where processing is based on consent, and lodge a complaint with the Information Regulator.

Where a request relates to personal information processed by Easy Systems on behalf of a Customer, Easy Systems may refer the request to the relevant Customer or require the request to be submitted to that Customer, because the customer is generally the responsible party for that information.

## **18. Children and special personal information**

The services are primarily intended for business use and are not aimed at children. Customers must not intentionally use the software to process children's personal information or special personal information unless they have a lawful basis and all required authorisations under applicable law.

Easy Systems does not intentionally use or disclose special personal information, such as race, religion, health information, biometric information, political views or similar sensitive categories, except where lawful and necessary for the relevant service or where authorised by the responsible party or data subject.

## **19. Third-party websites and external links**

Easy Systems websites and services may link to third-party websites or services. Easy Systems is not responsible for the privacy practices, security, terms or content of websites and services outside the Easy Systems / EasyQuote environment. Users should review the privacy policies and terms of those third parties.

## **20. Reporting suspected misuse**

If any person believes that a Customer is misusing the software, unlawfully processing personal information, sending unlawful communications, ignoring opt-outs or otherwise using Easy Systems / EasyQuote services unlawfully, they should contact Easy Systems using the contact details in this Privacy Policy.

If Easy Systems becomes aware of suspected misuse of the software or unlawful processing of personal information by a Customer, Easy Systems may investigate the matter and may suspend, restrict or terminate the customer's access where appropriate or legally required.

## **21. Changes to this Privacy Policy**

Easy Systems / EasyQuote may update this Privacy Policy from time to time to reflect changes in its services, software, legal obligations, business operations, Third-Party Services, privacy practices or security practices.

Updated versions of this Privacy Policy will be published on the relevant Easy Systems / EasyQuote website, portal or application, or otherwise made available to customers. The updated Privacy Policy will apply from the date stated in the updated version unless otherwise required by law. Continued use of the services after the updated Privacy Policy becomes effective will indicate acceptance of the updated Privacy Policy where acceptance is legally required or relevant.

## **22. Contact details**

Privacy and POPIA enquiries may be sent to Easy Systems / Kinsey Computers CC, Please submit your enquiry to [Support@easysystems.co.za](mailto:Support@easysystems.co.za)

## **23. Information Regulator**

Data subjects may have the right to lodge a complaint with the Information Regulator of South Africa if they believe their personal information has been processed unlawfully. Easy Systems encourages data subjects to contact Easy Systems first so that the matter can be investigated and, where appropriate, resolved.