

UMM Privacy Policy

Effective Date: July 2026

Entity: UMM Model (Unbreakable Mid Manager)

Jurisdiction: Republic of South Africa

1. Introduction and Scope

UMM Model ("we", "us", "our") respects your constitutional right to privacy (Section 14 of the South African Constitution). This Privacy Policy explains how we collect, use, process, and protect your Personal Information when you use our website (umm-model.com), apply for an Ignite Hour, or subscribe to our Intelligence Briefing.

This policy is governed by the Protection of Personal Information Act 4 of 2013 (POPIA) and the Electronic Communications and Transactions Act 25 of 2002 (ECTA).

2. The Information We Collect

We only collect information necessary to provide our structural diagnostics and consulting services (Processing Limitation). This includes:

- Identity Data: First name, last name, job title, and company name.
- Contact Data: Corporate email address, phone number, and LinkedIn profile URL.
- Diagnostic Data: Information submitted via our Socratic assessments (e.g., annual turnover brackets, management headcounts, and stated operational challenges).
- Technical Data: IP address, browser type, cookies, and website usage data (to improve user experience).

3. How We Use Your Information (Purpose Specification)

Your data is collected for specific, explicitly defined purposes:

- To evaluate your organisation's structural fit for the Ignite Hour diagnostic and The Forge™ programme.
- To communicate with you regarding your application, scheduling, or consulting proposals.
- To deliver our monthly *Structural Intelligence Briefing* (only if you have explicitly opted in).
- To maintain our Customer Relationship Management (CRM) database.

4. Direct Marketing and Your Consent

In strict compliance with POPIA and ECTA, we will never send you unsolicited direct marketing without your consent.

- By subscribing to the *Intelligence Briefing* via our website footer or forms, you consent to receive educational and promotional communications.
- Your Right to Opt-Out: You may unsubscribe from our mailing list at any time by clicking the "unsubscribe" link at the bottom of our emails, and we will cease marketing communications immediately.

5. Data Sharing and Third-Party Processors

We do not sell, rent, or trade your Personal Information. We only share data with trusted third-party operators who facilitate our business operations, such as:

- HubSpot: Our CRM provider.
 - Make.com: Our automation routing software.
 - Tally.so: Our secure form provider.
- All third-party operators are contractually bound to maintain strict security safeguards and process data only on our instructions, in compliance with POPIA.

6. Security Safeguards

We implement robust technical and organisational measures to prevent the loss, damage, or unauthorised access of your Personal Information, aligning with the Cybercrimes Act 19 of 2020. This includes secure server hosting, encrypted data transfers (SSL), and strict access controls limited to authorised UMM personnel.

7. Data Subject Participation (Your Rights)

Under POPIA and the Promotion of Access to Information Act (PAIA), you have the right to:

- Ask us to confirm whether we hold any Personal Information about you.
- Request a copy of the record of your Personal Information.
- Request the correction or deletion of your Personal Information.
- Object to the processing of your Personal Information on reasonable grounds.

8. Contact Our Information Officer

If you wish to exercise your rights, report a data breach, or have any questions about this policy, please contact our Information Officer:

- Name: Dave Dwyer
- Email: dave@umm-model.co.za
- Website: www.umm-model.com

If you are unsatisfied with our handling of your data, you have the right to lodge a complaint with the South African Information Regulator (infoereg@justice.gov.za).