

## **PRIVACY NOTICE OF TRADELINK**

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Tradelink respects and protects your privacy. Our Privacy Notice applies to all persons (both natural and juristic, like companies and close corporations) whose personal information we collect, regardless of form and medium. This includes our employees, consultants, agents, Merchants and service providers. The Privacy Notice applies to all our services and related websites.

In addition to this general notice we may need to explain specific privacy practices in more detail. In such circumstances, we develop and provide separate privacy notices to describe how we will handle the personal information that we collect.

- This is a general notice that explains:
- Who we collect personal information from;
- What personal information we collect;
- Why we collect your personal information;
- How we use your personal information; and
- What rights you have in relation to your personal information.

## **THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (POPIA)**

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The Protection of Personal Information Act, 2013 (POPIA) protects personal information of natural and juristic persons and requires Tradelink to comply with the eight minimum conditions set out in the Act. Personal information is information or an opinion about an identified person, or an individual who is reasonably identifiable.

Personal information includes special personal information, which is a particular category of personal information. While we recognise that protecting all personal information is important in gaining and maintaining your trust, special personal information is often afforded a higher level of protection. We are committed to handle your personal data with the utmost care and in accordance with the applicable data protection laws.

## **WHO ARE WE?**

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We are Tradelink, a supplier of solutions to the Consumer goods industry. We are located at 38 Saturn Crescent, Saturn Place Linbro Park, Johannesburg, South Africa, 2090

## **WHAT IS “PERSONAL DATA”? WHAT DO WE MEAN BY “PROCESSING”?**

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“Personal data” is any information that relates to you as an individual, either directly or indirectly. For example, think of your name, e-mail address, date of birth, IP address, or photo.

“Processing” personal data means performing any action that involves or affects personal data. For example, think of collecting, sharing, saving, accessing or deleting personal data.

# WHAT PERSONAL DATA DO WE PROCESS?

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## PERSONAL DATA YOU PROVIDE US

We collect and hold a broad range of personal information in records relating to:

- Employment and personnel matters relating to staff and contractors
- Facilitating appointments
- Facilitating meetings
- Contract management
- Complaints (including privacy complaints) and feedback provided to us
- We receive personal data from you when you contact our customer service and communicate electronically with us.

We process the following categories of personal data:

- Full name
- Address
- E-mail address
- Payment information
- Account history

## PERSONAL DATA WE AUTOMATICALLY OBTAIN FROM YOU WHEN YOU INTERACT WITH OUR SERVICE

Our website uses cookies (small files placed on your computer to collect standard log information and visitor behaviour information). When you visit our website, we collect information from you automatically through cookies. The information we collect may include IP address, browser type, the webpages you visit, or the advertisements on which you click.

### How do we use cookies?

We use cookies to make our website work, to improve your experience on our website, and to understand how you use our website.

#### Essential cookies

Our website uses session cookies to enable functions that are essential to our service. You as a user cannot disable these cookies. Essential cookies enable us to:

- Keep you signed in
- Remember your language preferences
- Store items in your shopping cart
- Retain your search results

Essential session cookies expire within an hour and are not retained on your device after the session has expired. These are only stored on your computer during your web session and are automatically deleted when you close your browser. These cookies usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any personal data from your computer.

#### Non-essential cookies (optional)

**Web analytics cookies:** Our website uses Google Analytics cookies to track your activity on our website, so that we can better understand how you use our website. The information gathered through these cookies is aggregated and does not identify you as an individual. Analytics cookies collect the following information:

- Number of visitors
- Page view statistics (times of visit, pages visited, time spent on a webpage)
- Referring site details (how you got to our website)
- Type of web browser
- Network location and IP address

**We do not set optional cookies automatically. If you would like to personalise your experience on our website, you need to enable optional cookies manually.** If you would like to set a cookie on your device to remember your preferences, *click here and read our cookie policy*

## **WHY DO WE PROCESS YOUR PERSONAL DATA?**

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We process your personal data for the following purposes:

- To carry out the contract we have with you:
- Provide you with our services
- To manage security and access to our premises
- For record keeping and administrative purposes as required by law

## **WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

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We will not provide your personal information to anyone else unless you consent thereto or one of the following exceptions applies:

- You would reasonably expect us to use the information for that purpose
- It is legally required or authorised, such as by a law, or a court or tribunal order
- It is reasonably necessary for an enforcement-related activity
- We reasonably believe that it is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety
- We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in and we reasonably believe that it is necessary for us to take appropriate action in relation to the matter
- It is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- The information is used only for historical, statistical or research purposes and is not published in an identifiable form.

When we share your personal information with selected service providers who work on our behalf, for specific defined purposes related to public services we provide we will ensure that appropriate protections of your personal information are in place with these third parties, in accordance with our obligations under the POPIA.

We are very careful with special personal information, and where practical, we usually group personal information together as aggregated data so that individuals cannot easily be identified.

Unless we have your clear informed consent or the law clearly allows us in certain limited circumstances, we will not:

- Sell or rent personal information
- Use your personal information for purposes that are different, unusual or unexpected in relation to the reason for collecting it in the first place; or
- Share your personal information with third parties in circumstances other than the ones we have referred to above.

## STORAGE AND DATA SECURITY

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Where a breach of personal information occurs, we will notify the Information Regulator and affected individuals as required. We will aim to provide you with timely advice to ensure you are able to manage any loss—financial or otherwise—that could result from the breach.

## HOW DO WE STORE AND PROTECT YOUR PERSONAL DATA?

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We take the security of your personal data very seriously. We have taken several technical and organisational measures to safeguard data security.

- We have an Information Security Officer who safeguards the security of our systems.
- We only disclose your personal data to employees and third parties who need your personal data to perform their jobs and provide our services.
- We have a *Personal Data Breach Procedure* in place. In the unlikely event of a personal data breach, our procedures will enable us to solve the problem as soon as possible, inform the Data Protection Authority, and inform you as the data subject, if necessary.
- We have implemented a data protection policy and a data protection management system. Our data protection management system enables us to monitor and address data protection risks continually.
- We perform annual security assessments and biennial security audits to ensure the effectiveness of our security measures.
- We have an information officer who is responsible for taking care of your personal data. The Privacy Regulator monitors our compliance with the applicable data protection laws.
- Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Tradelink data Retention policy. When the personal information we collect is no longer required, we delete or destroy it in a secure manner, unless we are required to maintain it because of a law, or court order.

## WHAT ARE YOUR DATA PROTECTION RIGHTS AND HOW CAN YOU EXERCISE THEM?

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We try to obtain your consent to collect and use your personal information, where practical.

- You do not normally have to give us personal information, but if you do not, we may not be able to communicate with or provide government services to you. You may also ask us not to send you unsolicited messages (opt-out), but then we cannot tell you about public services that may be important to you.
- You may access personal information we hold about you and ask us to correct or delete any that is wrong, irrelevant, out of date, misleading and so on. But we may check your identity before giving you access.
- You also have certain rights to withdraw consent or object to us using your personal information under POPIA, but these rights are limited. For example, if the purpose for which your personal information was requested initially does not exist anymore you may request that the information may no longer be used. We can decline your request to delete the information from our records if other legislation requires us to retain the information.

## CHANGES TO OUR PRIVACY NOTICE

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Our Privacy Notice may change from time to time on account of new business developments or regulatory changes. We recommend you check it regularly.

This Privacy Notice was last updated on 15 April 2021

## PRIVACY COMPLAINTS

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If you feel we are not dealing with your personal information fairly and lawfully, you may complain to the Information Regulator at

JD House 27 Stiemens Street

Braamfontein Johannesburg 2001

Tel: +27(0) 10 023 5200

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**Please first give us a chance to resolve any complaint by contacting us at the details below.** Your complaint should include a brief description of what happened, when it happened and what personal information was affected.

- Email: DataPrivacy@Trade-link.co.za
- Tel:+27 (11) 553 8000
- Fax: +27 (11) 553 8028