



(Registration Number: 2016/159119/07)

"The Company"

PROTECTION OF PERSONAL INFORMATION POLICY

INDEX

1. INTRODUCTION	3
2. SCOPE	3
3. INFORMATION WE COLLECT	4
4. SPECIAL PERSONAL INFORMATION	4
5. HOW WE USE YOUR INFORMATION	4
6. INFORMATION SHARING AND DISCLOSURE	5
7. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION	6
8. DATA SECURITY	6
9. DATA ACCURACY	6
10. DATA RETENTION	6
11. RIGHTS	6
12. CONTACT INFORMATION	7

1. Introduction

The Company abides by the Protection of Personal Information Act, No 4 of 2013 (POPIA). POPIA aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Through the provision of quality goods and services, the organisation is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees and other stakeholders.

The Company is committed to protecting your privacy. This Privacy Policy outlines how the company uses, protects and processes any information collected from a Data Subject and provided to us. the types of personal information we collect, how we use and protect it, and your rights regarding this information.

We will not use your Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure or access.

Please note that we reserve the right to amend and update this Policy from time to time.

By providing us with your Personal Information, you –

1. Agree to this Policy and authorise us to process such information as set out herein; and
2. Authorise the Company, its service providers and business partners to process your Personal Information for the purposes stated in this Policy.

The Company will only process Personal Information referred to in section 57(1) of POPIA upon obtaining prior authorisation in accordance with section 58(1) of POPIA and subject to section 57(3) of POPIA.

Capitalised terms used in this Policy have the meanings ascribed thereto in section 1 of POPIA, unless otherwise defined herein.

2. Scope

This Policy applies to the Company's employees and/or any other person, including without detracting from the generality thereof, any juristic or natural person, employees, prospective employees, employment candidates, service providers, Operators, customers and consumers, governmental, provincial and municipal agencies or entities, regulators, persons

making enquires and/or third parties, including all associated, related and/or family members of such Data Subjects or any person who may be acting on behalf of/or in a representative capacity in respect of the Data Subject, and from whom the Company receives Personal Information.

3. Information We Collect

We collect and process personal information mainly to provide services and to help improve our offerings.

The type of information we collect and process will depend on the purpose of the information. This will be communicated.

The information may include (but are not limited to) Contact Information, Employment Details, Sensitive Information, data from surveys (like social media), demographic attributes, information about a device, consent records, payment details and data relating to visits on our website.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information (if applicable).

4. Special Personal Information

Where we need to process your Special Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, with your consent and in accordance with applicable laws.

5. How We Use Your Information

The personal information collected is used mainly for contacting clients and providing suitable solutions/responses to clients.

We will primarily use your Personal Information only for the purpose for which it was originally or primarily collected. We will use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. We may subject your Personal Information to Processing during the course of various activities, including, without limitation, the following -

5.1.1 operating our business;

5.1.2 to analyse, develop, improve and optimize the use, function and performance of our products and services;

5.1.3 compliance with applicable law; and

5.1.4 to manage the security of our sites, networks and systems;

5.1.5 for the purpose of making contact with you and attending to your enquiries or requests;

5.1.6 for the purpose of carrying out actions for the conclusion and performance of a contract between the Company and yourself / the Data Subject;

5.1.7 for the purpose of pursuing your and/or the Company's legitimate interests, or that of a third party to whom the Personal Information is supplied;

5.1.8 for the purpose of providing, maintaining and improving the Company's products and services, and to monitor and analyse various usage and activity trends pertaining thereto;

5.1.9 for the purpose of performing internal operations, including management of employees, the performance of all required functions of the Company, attending to financial matters including budgeting, planning, invoicing, facilitating and making payments sending receipts and generally providing commercial support, where needed, requested or required;

5.1.10 for the purpose of preventing fraud and abuse of the Company's processes, systems, procedures and operations, including conducting internal and external investigations and disciplinary enquires and hearings;

5.1.11 for safety and security purposes; and

5.1.12 to comply with applicable laws.

5.2 You agree that the Company may use all the Personal Information which you provide to the Company, which the Company requires for the purposes of pursuing its business objectives and strategies.

6. Information Sharing and Disclosure

The Company may share your personal information with third parties only in the following circumstances:

1. With service providers who perform services on our behalf.
2. As required by law.
3. To protect the rights, property, or safety of the Company, its employees, or others.
4. To any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security.

5. To any relevant third-party provider, where our website uses third party advertising, plugins or content.

7. International Transfer Of Personal Information

We may transfer your Personal Information to recipients outside of the Republic of South Africa.

Personal Information may be transferred outside of the Republic of South Africa provided that the country to which the data is transferred has adopted a law that provides for an adequate level of protection substantially similar to POPIA, the Operator/third party undertakes to protect the Personal Information in line with applicable data protection legislation and the transfer is necessary in order to provide the Company's products and services.

8. Data Security

We implement appropriate technical and organizational measures to protect personal information against unauthorized access, alteration, disclosure, or destruction. This includes using secure servers, encryption, and access controls.

Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

9. Data Accuracy

The Personal Information provided to the Company should be accurate, complete and up to date. Should Personal Information change, the onus is on the provider of such data to notify the Company of the change and provide the Company with the accurate data.

10. Data Retention

Personal information is retained for as long as necessary to fulfil the purposes for which it was collected or as required by law. When no longer needed, personal information will be securely destroyed or anonymized.

11. Rights

You may have rights under the South African and other laws to have access to your Personal Information and to ask us to rectify, erase and restrict use of your Personal Information. You may also have rights to object to your Personal Information being used, to ask for the transfer

of Personal Information you have made available to us and to withdraw consent to the use of your Personal Information.

12. Contact Information

If you have any questions or concerns about this policy or your personal information, please contact:

Name: Leandre Blom

Tel: 053 723 1245

Email: leandre@record.co.za