



POLICY

PRIVACY POLICY IN TERMS OF POPI ACT, 4 OF 2013

This manual is applicable to Dedicated Procurement Solutions (Pty) Ltd (DPS)

1. INTRODUCTION

Welcome to the DPS privacy policy. This action plan details our commitment to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person which in turn could be used to identify you and that person (personal information).

2. STAKEHOLDERS

This policy applies to you if you are:

- A visitor to our website;
- Supplier or service provider; or
- A customer who has ordered the goods or services that we provide.

3. PERSONAL INFORMATION

Personal information includes:

- Certain information that we collect automatically when you visit our website; and
- Optional information that you provide to us voluntarily; But excludes:
- Information that has been made anonymous so that it does not identify a specific person;
- Permanently de-identified information that does not relate or cannot be traced back to you specifically; or Non-personal statistical information collected and compiled by us.

Common examples of the types of personal information which we may collect and process include your:

- Identifying information – such as your name, surname, date of birth or identification number of any kind;
- Contact information – such as your phone number or email address;
- Address information – such as your physical or postal address; or
- Company information – such as your company incorporation records, tax and VAT records, credit history, invoices and statements, insurance information and partner details.

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- Financial information – such as your bank account details; or
- Criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings through our external or internal disclosure channels.

4. ACCEPTANCE

- You must accept all the terms of this policy when you order any of our goods, register for, or use the website or any of our services. If you do not agree with anything in this policy, then you may not order any of our goods, register for, or use the website or any of our services.
- You may not access our website or order our goods or services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.
- By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.
- You may only send us your own personal information or the information of another data subject where you have their permission to do so.

5. COLLECTION OF INFORMATION

On registration

Once you register on our website or application, you will no longer be anonymous to us. You will provide us with certain personal information.

This personal information will include:

- Your name and surname;
- Your email address;
- Your telephone number;
- Your company name, company registration number, and VAT number;
- Your postal address or street address; and
- Your username and password.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.



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On order

When you order any goods or services from us, you will be asked to provide us with additional information on a voluntary basis (goods information or services information).

Events

You will provide us with personal information when you attend an event that we host.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on

Cookies

We only use necessary cookies to enable core functionality on our website. We do not actively trigger any other types of cookies on our site.

Optional details

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage or promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

Recording calls

We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

Purpose for collection

We may use or process any goods information, services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- Goods or services purposes – such as:
 - o Collecting orders or requests for and providing our goods or services,
 - o Managing our contracts with various data subjects,
 - o Managing customer credit in general,
 - o Processing customer requests or complaints,
 - o Keeping our data subject records and information up to date,
 - o Understanding our data subject's needs better, and
 - o Providing support to our customers.
- Marketing purposes – such as:
 - o Marketing to customers,
 - o Marketing to prospects, and
 - o Running promotional competitions for business.
- Business purposes – such as:
 - o Managing third party employee personal information,
 - o Auditing,
 - o Accounting, and
 - o Business planning and due diligence, and joint ventures, disposals of business, or other proposed and actual transactions.
- Legal purposes – such as:
 - o Handling claims and enforcing debts, and
 - o Complying with regulations or pursuing good governance.

We may use your usage information for the purposes described above and to:

- Remember your information so that you will not have to re-enter it during your visit or the next time you access the website;
- Monitor website usage metrics such as total number of visitors and pages accessed; and
- Track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.



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6. USE OF INFORMATION

DPS may process your personal information to fulfil our obligations to you. We will only process your personal information:

- With your explicit consent;
- Where it is necessary to carry out actions for the conclusion or performance of a contract with you;
- Where it is necessary for us to comply with a legal obligation; or
- Where we can show legitimate grounds for processing your personal information.

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

7. DISCLOSURE

Sharing

DPS may share your personal information with:

- Any sites within our company so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- An affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- Our goods suppliers or service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit);
- Credit bureaus to report account information, as permitted by law;
- Other third parties who provide us with relevant services where appropriate.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- By a subpoena or court order;
- To comply with any law;
- To protect the safety of any individual or the general public; and
- To prevent violation of our customer relationship terms.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

8. YOUR RIGHTS

Request what information we hold on you

You may request access to your personal information to receive a copy of the personal information that we hold on to you.

Updating or removing

You may choose to update the personal information you have submitted to us, by contacting us by phone or email.



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Withdrawal of consent or objection to processing

You may withdraw your consent where we are relying on consent as a lawful justification to process. You may also object to our processing where we are relying on another lawful justification for processing. Please note that if you do so, we might not be able to provide services to you.

We may need to request additional information from you to verify your identity for you to access these rights. This is to ensure that your personal information is not disclosed to an unauthorised person.

Our Rights

To exercise any of your data subject rights please contact us at george@corfield.co.za. If we are unable to assist with your query, you can also contact the Information Regulator at POPIAComplaints@inforegulator.org.za.

9. SECURITY

DPS takes the security of personal information very seriously and we will always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

10. ACCURACY AND RELEVANCE

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold about you by emailing us or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

11. RETENTION

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- Retention of the record is required or authorised by law; or
- You have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information. We may retain your personal information in physical or electronic records at our discretion.

12. RESTRICTION OF PROCESSING

You may request that we restrict the use of your personal information. When we restrict your personal information, we still have the right to store it but not use it.

13. FOREIGN TRANSFERS

We send personal information outside of South Africa to various countries in line with our business requirements. We will only transfer data to other countries who have similar privacy laws to South Africa's that provide an adequate level of protection, or to recipients who can guarantee the protection of personal information to the same standard we must protect it.

14. DATA BREACHES

We will notify our customers or suppliers of any confirmed data breaches that have occurred and where personal information has been accessed or acquired by any unauthorised person.

15. LIMITATION

DPS are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

16. CHANGES TO POLICY

We may change the terms of this policy at any time. We will notify you of any changes by placing a notice in a prominent place on the website, or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods and services.



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If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

17. FURTHER INFORMATION

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us (stevey@dedicatedprocurement.co.za).