

SOUTH AFRICAN LUBRICATION DISTRIBUTORS (PTY) LTD

DATA PRIVACY NOTICE

INTRODUCTION

South African Lubrication Distributors (Pty) Ltd, (Registration Number 2004/014296/07) respect your privacy and is committed to protecting it. Our values of accountability, honesty, integrity, quality, excellence and respect finds true application in the committed approach of the company to data privacy.

We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with the Protection of Personal Information Act(POPIA). The company undertakes to ensure that any additional processing of personal information will be in accordance with the purpose for which it was collected.

This Notice explains how we obtain, use and disclose your personal information. It also aims to inform you of the choices you can make about the way your information is collected and used, your rights and how to exercise them.

THE INFORMATION WE COLLECT

Your personal information we collect, hold and process include, inter alia, the following:

- **Identity Data** - Identity numbers, date of birth, first name, last name(s), gender, title, occupation.
- **Contact Data** - billing address, delivery address, email address, telephone and mobile numbers.
- **Financial Data** - Bank name, account name, account number, branch name and branch code.
- **Transaction Data** - Purchases made, quotations, delivery notes, proforma and tax invoices, financial statements
- **Marketing and Communications Data** – Survey responses, marketing communications, Website transactions, various social media platforms, loyalty programmes, trade and consumer promotions and from third parties.

We may collect and hold information from former, current, and prospective customers, our suppliers, and their employees, as well as contractors and others.

It is therefore imperative that we have accurate and current information about all data subjects, to enable the company to render the best possible service and assistance where required. Please check that your personal details are correct and assist the company in updating our records accordingly, especially when your current status changes. This minimises the risk of you not receiving important communication and updates from the company.

PURPOSES FOR WHICH WE USE YOUR INFORMATION

Purpose for which we process your Personal Information is to ensure that we can provide you with the great customer service that you have become accustomed to from our company.

We may process your Personal Information, for among other reasons, the following:

- Market research or customer satisfaction research
- Use data analytics to improve our website, products/services, marketing, customer relationships and experiences
- Respond to any communication received from you, which may include instructions, requests, queries, complaints and questions;
- Collect and recover all monies owed to us
- Keep our records relevant and current with your contact details, for the administrative, marketing, strategic planning, product or service improvement and development, total quality management, survey and research purposes, our partners and service providers details
- Process and deliver orders or collecting rejected orders

Personal Information shall be exclusively collected for the specific defined and lawful purpose of conducting business.

The company may also disclose your personal information for law enforcement and other legitimate reasons. We shall endeavour to protect its continued confidentiality to the best of our abilities and the measures put in place.

OUR DATA COLLECTION METHODS

We make use of different methods to collect data from and about you and this includes:

- Credit Application: Direct interaction with the company when you apply for credit and filling our credit application form.
- Cash Purchases: We collect your personal information when you make cash purchases of our products.
- Request for Quotation: We collect your personal information when you make a request for quotation.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and/or public sources
- Transactional Data: Online shopping and payment service providers such as Payfast, Shopify, are other sources we use to collect personal information

Limits on collection

We collect only the information that is required to provide our service, administer the service that we provide and communicate with you. We do not collect any other information, or allow information to be used for other purposes, without your express (i.e., verbal or written) consent, except where authorised to do so by law.

Is the supply of the information voluntary or mandatory?

Supplying of certain types of information is mandatory.

If you,

- 1) Refuse to provide your personal information which we request;

- 2) Do not consent to us handling your personal information in accordance with this Privacy Notice; or
- 3) Revoke any consent regarding the handling of your personal information by the company which you have previously given,

such refusal or revocation of previously given consent may prevent us from performing our services. Depending on your circumstances it may affect you and services we provide to you.

DISCLOSURES OF PERSONAL INFORMATION

1. Our agents and sub-contractors

Your personal information may be shared with our agents and sub-contractors and selected third parties who process the information on our behalf.

2. Disclosure to third parties

We may also disclose your personal information to third parties under certain circumstances. If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if such disclosure is necessary.

3. Disclosures authorised by law:

There are limited situations where we are legally required to disclose your personal information without your consent. These situations include, but are not limited to, reporting infectious diseases and fitness to drive, or by court order.

4. Disclosures to all other parties:

Your express consent is required before we will disclose your information to third parties for any purpose other than to provide you with care or unless we are authorised to do so by law. Examples of disclosures to other parties requiring your express consent include, but are not limited to, third party medical examinations, enrolment in clinical (research) trials.

5. Transfer the information to a third country.

We may transfer your information to a cloud database outside your country of domicile, potentially including countries which may not require an adequate level of protection for your Personal Information compared with that provided in your country.

RIGHTS OF THE DATA SUBJECT

We will take all reasonable steps to confirm your identity when you exercise your rights as the data subject.

- 1) The data subject, or competent person where the data subject is a minor, may withdraw his, her or its consent to procure and process his/her or its personal information, at any time, providing that the processing of the personal information was performed legally, prior to the request for the withdrawal.
- 2) A data subject, having provided adequate proof of identity, has the right to:
request the company to confirm, free of charge, whether it holds personal information regarding the data subject; and request from the company a record or a description of the personal information relevant to the data subject held by the company, including information regarding the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

- 3) This must be processed within a reasonable period, at a fee prescribed as determined by the Information Officer, in a reasonable manner and format and in a form that is generally understandable.
- 4) A data subject may request the company, to correct or delete personal information in its possession or under its management which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been obtained illegally.
- 5) A data subject may request the Company to destroy or delete their record of personal information.

This must be processed only if it is permissible and has been approved by the Information Officer

LIMITATIONS ON ACCEESS

In extremely limited circumstances you may be denied access to your records, but only if providing access would create a significant risk to you or to another person.

OFFICE SAFEGUARDS

1. How secure is your information?

Safeguards are in place to protect the security of your information. These safeguards include a combination of physical, technological, and administrative security measures that are appropriate to the sensitivity of the information. These safeguards are aimed at protecting personal information against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.

2. What is our communications policy?

We protect personal information regardless of the format. Specific procedures are in place for communicating by phone, email, social platforms, post or courier.

3. How long do we keep information?

We retain records as required by law and professional guidelines.

4. How do we dispose of information when it is no longer required?

When information is no longer required, it is destroyed in a secure manner, according to set procedures that govern the storage and destruction of personal information.

5. Complaints process

If you believe that this office has not replied to your access request or has not handled your personal information in a reasonable manner, please address your concerns first with our Information Officer. You may also choose to make a complaint to the Information Regulator.

Information Officer

Name: Sesana Moloi

Tel No: +2711 674 5391

Email: admin1@salubedist.co.za

Information Regulator

Address: 33 Hoofd Street; Forum III, 3rd Floor Braampark

Tel No: +27 (0) 10 023 5200

Email: complaints.IR@justice.gov.za

Web Address: <https://www.justice.gov.za/inforeg/contact.html>