



## **FOSKOR (PTY) LTD PRIVACY STATEMENT**

This Privacy Statement ('Statement') sets out the principles applicable to Foskor (Pty) Ltd ('Foskor') for the collection and use of personal data, why and how we collect and use personal data, provides information about your rights in relation to personal data as well as our general provisions for personal data protection.

Foskor is committed to the protection of personal data and will conduct processing of all personal data in accordance with the requirements of the Protection of Personal Information Act, No.4 of 2013 and its Regulations ("POPIA").

We may use personal data provided to us for any of the purposes described in this Statement or as otherwise stated at the point of collection. This Statement shall apply in cases where we are provided with any type of information that contains personal data, when any correspondence, commercial offers or other economic financial activities are conducted, and when individuals visit our website.

This Statement is also intended to inform all data subjects about other personal data processing operations performed by us and the main provisions aimed at ensuring the privacy of data subjects.

### **PROCESSING OF PERSONAL DATA BY FOSKOR**

We shall process your personal data when processing is:

- for purpose of our legitimate interests in the effective delivery of products and in the effective and lawful operation of our business;
- to satisfy any requirement of laws and regulations;
- necessary for the performance of a contract or before the conclusion of a contract;
- related to an existing employment relationship and/or personnel selection or job application;
- necessary for us to fulfil a legal obligation to provide data and information about a data subject to state authorities and to ensure the safety and health of employees;
- necessary for our legitimate interests or a third party to ensure the protection of our company, its assets, security of technological processes, internal administration, etc.; or
- of certain personal data for one or more specific purposes with the data subject's consent.

### **What Personal Data are collected and processed?**

We collect and process the following categories of personal data:

- Basic data required for the above purposes: name, surname, personal identification number, date of birth, contact details, bank account details, etc.;
- Data necessary for the performance of works, sale/purchase of goods; personal data contained in contracts and in contract-related and accounting documents, other data related to our economic and financial activities;
- Data generated using electronic means of communication (telephone number, IP address, e-mail address, etc.);
- Video data recorded by our video surveillance equipment at our business premises; or
- Other data which are collected with the consent of a data subject, and which are detailed at the time the consent is requested.

## **What are the legal grounds for collection of Personal Data?**

We collect and process your personal data only on legal grounds specified in regulatory requirements, to ensure the contractual relationship between us and our employees, purchase/sale of goods, or ensuring our other operational, economic and financial activities; or your consent is another ground on which we may process your personal data.

We will take all possible measures to ensure that personal data are processed accurately, fairly and lawfully, that it is processed only for the specified purposes it was collected for, in accordance with the requirements for the processing of personal data established by the POPIA.

## **How long will your Personal Data be stored?**

- We will store your personal data no longer than required for the purposes of data processing or as provided by law; and
- Our documents containing personal data shall be processed and stored in accordance with the terms of archiving and retention of documents regulated by the laws of the Republic of South Africa.

## **To whom do we provide, or may we provide your Personal Data?**

- To those data processors who perform certain tasks for us;
- To sellers/buyers, manufacturers, logistics, mail and parcel delivery companies, when it is related to our economic and commercial activities;
- To law enforcement and other authorities or state institutions in accordance with the requirements of legal acts;
- To other persons with your consent, when such consent is obtained due to a specific reason; or
- To an operator contracted by us, to assist with the processing of personal information.

## **SECURITY OF PERSONAL DATA**

- We will manage your personal data in a responsible and secure manner. During the processing of personal data, we will implement the technical and organisational measures of data protection established by legal requirements, to protect your personal data processed from illegal or accidental disclosure, destruction or loss, and from any other illegal processing;
- We have established restrictive access to personal data (only employees of the respective positions are assigned to process certain personal data and only for the purposes of our business activities). Our employees undertake not to disclose or disseminate information received in the workplace pertaining to our employees, contractors, vendors, customers and visitors;
- The security measures for personal data shall be determined considering the risks that may arise from the processing of personal data; and
- We have implemented numerous technical and organizational measures to ensure that the personal data processed via this website is protected as completely as possible.

## **CROSS-BORDER TRANSFERS OF PERSONAL DATA**

- If we process your personal data, your personal data may be transferred to and stored outside South Africa; and
- Transfer your personal data outside of South Africa (where applicable) will be only:
  - To a recipient located in a country which provides an adequate level of protection for your personal data; or
  - Under an agreement which satisfies South African requirements for the transfer of personal data to data processors or data controllers outside South Africa.

## **PERSONAL DATA COLLECTED ON OUR WEBSITE**

- Our company website is protected from unauthorised access and management, and data pertaining to website visitors are protected from unauthorised use;
- Our internet pages can be used without providing any personal data. However, if a person wishes to make use of services offered by our company via our website, personal data may have to be processed. If the processing of personal data is required and there is no legal basis for such processing, we will generally obtain the consent of the person concerned; and
- Our service providers who provide the website content management tools to us, may also have access to the technical records.

## **YOUR RIGHTS IN RELATION TO PERSONAL DATA**

You may have certain rights under South African law in relation to the personal data we hold about you.

In particular, you have a legal right to:

- Obtain confirmation as to whether we process personal data about you, receive a copy of your personal data and obtain certain other information about how and why we process your personal data; or
- The right to request for your personal data to be amended or rectified where it is inaccurate (for example, if you change your address) and to have incomplete personal data completed;
- Request deletion of your personal data;
- Restrict the processing of your personal data;
- Object to the processing of your personal data;
- Withdraw consent for the processing of your data; or
- Not provide your personal data.

### **Contact us**

Please refer to our PAIA Manual if you want to submit a request to exercise a legal right in relation to your personal data, or if you have an enquiry or complaint about the handling of your personal data. Our PAIA Manual contains our contact details.