


KWV POLICY		
Subject:	Website Privacy Notice	Document No. 2025452
Controlling Officer:	DEPUTY INFORMATION OFFICER Pim Swanepoel	Revision No. 00
Approving Officer:	INFORMATION OFFICER Daniel Smit	Active Date 23 June 2021

1 PURPOSE

Privacy laws around the world dictate that if you collect personal information from your website visitors, then you need to have a Privacy Policy posted to your site and available with your mobile app (if applicable).

A Privacy Policy is a legal agreement that explains what kinds of personal information the Business gather from website visitors, how KWV use this information, and how we keep it safe.

Personal information refer to information that identifies or relates specifically to you, for example, your race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth. Information relating to your education or the medical, financial, criminal or employment history, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment, together with biometric information, personal opinions, views or preferences also falls within the very broad definition. In addition, correspondence is also included.

The Privacy Policy generally covers:

- The types of information collected by the website or app
- The purpose for collecting the data
- Data storage, security and access
- Details of data transfers
- Affiliated websites or organisations (third parties included)
- Use of cookies

2 SCOPE

This privacy notice applies to Warshay investments (Pty) Ltd and its subsidiaries (hereafter referred to as “KWV”) and all prospective, present and past KWV Stakeholders (Stakeholders), including but not limited to the following:

- Employees, affiliates, consultants and contractors
- Customers (including persons that are involved in the course of service delivery)
- Visitors to our website
- Third Party Service Providers / partners / operators / resellers
- Any party who contracts with us or otherwise uses our products and/or services

3 REFERENCES

None

4 ABBREVIATIONS AND DEFINITIONS

The term 'KWV' and abbreviation 'KWV' refer to any company within the Warshay Investment Group of Companies, irrespective of its location and name, both nationally and internationally.

5 RESPONSIBILITY

The Information Officer/Deputy Information Officer is the custodian of all protection of personal information related policies and has to ensure the policy is updated and maintained. Privacy champions to ensure implementation and adherence to this policy at all times.

6 STEPS

6.1.1 We may update this Privacy Notice from time to time and encourage you to review it online periodically.

6.1.2 We are committed to protecting the privacy rights of our Stakeholders. This privacy notice describes our information handling and associated privacy practices. This includes:

- How we collect personal information about our Stakeholders
- How we process and use such personal information
- How we may share personal information
- How we secure personal information
- Stakeholder rights

6.1.3 Our data practices are subject to applicable laws in the countries in which we operate. This means that we engage in the practices described in this notice in a particular country only if permitted under the laws of that country.

6.1.4 We only collect, store and process your personal information in accordance with applicable laws and regulations.

6.2 TYPES OF PERSONAL INFORMATION COLLECTED

We may collect the following types or categories of personal information, including:

- Contact details such as name, email address, telephone number and work location.
- Company details required for third parties and customer administration.
- Confidential information that relates to organisations, for example, information security risks and controls.
- Government issued identification numbers for the purposes of employee application validation and employee administration and third party's registration and administration.
- Information related to candidate or employee race and disability status for BBBEE reporting purposes.
- Other relevant personal information to enable the conduct of business.
- Technical information including your Internet Protocol (IP address) which is used to connect your computer to the internet, operating system and browser type and platform for system administration; and
- Information about your use of our Website including details of your visits such as pages viewed and the resources that you accessed. Such information includes traffic data, location data and other communication data.
- We use Google Analytics to collect site traffic statistics. Analytics tracks and reports website traffic. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of Google Analytics by installing the Google Analytics opt-out browser add-on.

6.3 PERSONAL INFORMATION HANDLING PRACTICES

We endeavor to notify our Stakeholders about the manner in which, and the purposes for which, we collect and use their personal information. We collect and use personal information for the following purposes:

- To establish and maintain a relationship with our customers, enabling ongoing service delivery.
- To understand customer needs and preferences. For example, we maintain a record of services you have

- purchased or signed up for.
- Where the collection and processing is required by Law, for example, mandatory tax reporting requirements.
 - For audit and record keeping requirements.
 - To conduct statistical or market related research.
 - For the administration of remuneration, employment benefits and accounts payable / receivable.
 - To evaluate candidates and applicants who submit personal information for employment opportunities.
 - To effectively respond to queries submitted through our online “contact us” feature or to individual team members.
 - To communicate relevant services and information to Stakeholders.
 - Competitions and promotions.
 - To follow up as part of our customer care procedures.

We may use your personal information collected including but not limited to your name, email, company and job title for purposes of contacting you, sending notifications, updates and invitations to events. If you would like to withdraw your consent for such processing, you may use the “contact us” feature on this website (update as per the process).

Unless required or permitted by law, we shall not use or disclose personal information or sensitive personal information for a new purpose that has not been identified and consented to by you.

6.4 RETENTION OF PERSONAL INFORMATION

We retain personal information for as long as may be reasonably necessary in accordance with applicable law.

6.5 DIRECT MARKETING ACTIVITIES

We would like to provide you with information about new products, promotions, special offers and other information, which we think you may find interesting. By you opting-in, you agree that we may send you marketing communications via (SMS, E-mail, Telephonic Calls).

You may opt out from receiving marketing communications by clicking on the opt-out link that will be contained in the relevant electronic communication.

6.6 COOKIES

Currently we only use cookie technology that is strictly necessary for administration and operation of our website. These are necessary to enable you to click through our website. Example of the type of information that is collected include:

- The IP address from which you access the site.
- The type of browser and operating system used to access the site.
- The date and time of your access to the site.
- The pages you visit.
- The internet address of the website from which you accessed the site.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log onto the Website. If you accept a “cookie” or fail to deny the use of “cookies”, you agree that we may use your personal information collected using “cookies” (subject to the provisions of this Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of the Website.

6.7 CHOICE AND CONSENT

In most circumstances, we receive personal information directly from you, when you request services or products from us, we may require personal information for contact or billing purposes.

We will only require you to consent to the collection, use or disclosure of personal information as per the identified purposes in this notice. We will not unreasonably withhold products, services or information if you refuse or withdraw your consent.

You may withdraw or modify your consent at any time, subject to legal and contractual restrictions, provided that reasonable notice is given to us. If you would like to withdraw your consent for such processing, you may use the “contact us” feature on this website. Please allow at least 30 days for us to effect changes in communication preferences.

6.8 THIRD PARTIES

We may make use of third party services to support our service delivery to Stakeholders. Our third parties are vetted in terms of information protection risks and agree to required privacy practices and controls. Examples of third parties with whom we may share personal information, include (update examples) :

- Member companies within KVV
- Regulators
- Selected and contracted service providers that support our service delivery
- Persons acting on our behalf (incl. affiliate consultants and third parties)
- Auditors
- Courier services

We will not share personal information with third parties other than as disclosed in this notice or explicitly agreed with you. Further, we will only disclose your personal information if:

- The law requires it.
- We have a public duty to disclose the information.
- If it is reasonably necessary to prevent illegal activity.
- Our or your legitimate interests require disclosure.
- You consented to such disclosure.

6.9 CROSS BORDER TRANSFER

We operate globally, and in certain instances, may process personal information in other countries to support ongoing business delivery. Some countries may not be subject to data protection laws or policies which are as stringent as the data protection laws applicable to the European Union and/or in South Africa. Where this is the case, we will ensure that the receiving party agrees in writing to implement adequate privacy principles before we share any personal information with such party.

6.10 HOW WE SECURE PERSONAL INFORMATION

We endeavour to protect the security, availability and confidentiality of personal information by implementing and maintaining reasonable technical and organisational controls. Our controls are aligned to leading practices and frameworks, and other generally accepted controls for information security

Our technical and organisational personal data security measures include:

- the storage of your personal data under password-secured databases;

- the restriction of access to your personal data to specific staff/personnel who are designated and mandated to manage your personal data;
- the restriction of access to all our premises where your personal data is stored in physical or digital form; and
- the binding of any third parties who handle your personal data to confidentiality obligations with respect to the same.

6.11 CHILDREN'S PRIVACY

Should KWV collect children's Personal Information under the age of 16 years old, KWV will ensure that the relevant consent is obtained from the parent/legal guardian on behalf of the child.

6.12 YOUR PRIVACY RIGHTS

We take note of your rights under applicable data privacy and related legislation, specifically your right to object, upon reasonable grounds, to your personal information being processed. Further, you have the right to request access to the personal information we hold about you by contacting us or completing the PAIA Request Form available at http://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf.

Alternatively, and in countries outside of South Africa you may write to us and send your request to ***popiainfo@kwv.co.za***

You are encouraged to contact us in order to update your personal information as and when necessary.

6.13 QUERIES AND COMPLAINTS

If you have any queries or complaints about Privacy, please contact us via email at ***popiainfo@kwv.co.za***

6.14 EXTERNAL LINKS

Our website may contain links to external websites and sources of information. This does not indicate endorsement by us and due care should be taken before following such links.

6.15 INFORMATION REGULATOR

Should you wish to contact the South African Information Regulator, we have provided their contact details:

Telephone: 012 406 4818

Fax: 086 500 3351

Email: infoereg@justice.gov.za

CONTACT US AT

Warshay Investments Pty Ltd t/a KWV

57 Main Street

Southern Paarl

7646

021 807 3911

7 RECORDS

Record name	Kept by	Location	Period	Disposal
None				

8 ATTACHMENTS

None

9 CHANGES

DATE	CHANGES <i>(insert paragraph numbers where changes were made)</i>	REASON FOR CHANGE <i>(see 2000084 for examples)</i>
23 June 2021	New Policy	Protection of Personal Information Act implementation.