

Preamble

We invite you to carefully read this Privacy Policy, which sets out in which context we are processing your personal information and explains your rights and our obligations when doing so.

By agreeing to this Privacy Policy, you provide us with your consent to collect, receive, record, organise, collate, store, update, change, retrieve, read, process, use, distribute and share your personal information in the ways set out in this Privacy Policy, to the extent that such consent may be required to permit us to do so.

Should you have any further question in relation to the processing of your personal information, we invite you to contact Pieter Smith at george@batterypro.co.za, 27 Albert Street, George, or telephone number 083 320 3288.

What Personal Information do we process and for which purposes?

The information we collect from you, with your consent, physically, telephonically or via our website may include:

- Your general and identification information (name, first name, last name, gender, Identity Number, email and/or postal address, fixed and/or mobile phone number).
- Your function (title, position, name of company, expertise and participation in/contribution to business and construction organisations).
- Payment information (bank account details, VAT or other tax identification numbers).
- Your electronic and written identification information where required for the purpose of delivering products or services to our company (login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings).
- Information regarding your preferences including in terms of channels of communication and frequency.
- Data you provide to us for example when you fill in forms or during events you attend, or when you answer questions in a survey.
- Data which relate to our products and services; and
- Information about the activities/interactions you have with us, including potential future interactions and updates for duration of contracts and agreements to ensure updated information integrity.

Purposes:

- Manage our relationship with you (e.g. through our electronic and hard copy databases).
- Implement tasks in preparation of or to perform existing contracts.
- Evidence transactions.
- Provide you with adequate and updated information about our products and services.

- Improve the quality of our services by adapting our offering to your specific needs.
- Answer your requests and provide you with efficient support.
- Send you communications regarding products or services that we promote.
- Manage communications and interactions with you (e.g. through the operation of a database keeping records of interactions with professionals or managing call planning as well as call reporting and other electronic and digital interactions).
- Track our activities (e.g. measuring interactions or sales, number of appointments/calls).
- Invite you to events or promotional meetings sponsored by us (e.g. conferences, webinars, meetings on various digital platforms).
- Manage our IT resources, including infrastructure management and business continuity.
- Preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits and defending litigation).
- Manage mergers and acquisitions involving our business.
- Archiving and record keeping for the specified period for legal and regulated processes.
- Billing and invoicing; and
- Any other purposes imposed by law and authorities.

If you intend to provide us with personal information about other persons (e.g. your colleagues, family and friends), you must provide a copy of this Privacy Policy to the relevant person(s), directly or through their employer, and ensure that they provide consent to your sharing their personal information with us in terms of this Privacy Policy. Should you provide such personal information, we accept that you have prior consent from them to provide such information voluntarily.

Most of our services do not require any form of registration. However, some services may require you to voluntarily provide us with personal information as above.

We may collect and use this personal information to provide you with products, services, and customer support, to bill you for products and services you request, to market products and services which we think may be of interest to you, or to communicate with you for other purposes which are evident from the circumstances or about which we inform you when we collect your personal information (you have a right to withdraw consent in writing or electronically).

We undertake to ensure that appropriate security controls measures are implemented to protect all the information submitted.

It is expressly prohibited for any person, business, or entity to gain unauthorised access to any page on our Site or to deliver or attempt to deliver any unauthorised, damaging or malicious code thereto.

Surveys

We may ask you to complete surveys e.g., to help us improve your future interactions with us, and for marketing purposes from time to time, although you do not have to respond to them.

What do we do with personal information collected from you?

We use personal information to provide the services and products you request from Battery Pro George in connection with transactions. We may also use the information to advertise products and services, to collect and process payments and maintain accounts and records, to prevent crime and aid in the prosecution of offenders, and to administer and maintain customer records. In addition, we use this information to improve our customer services platform, prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical, or other functions on our behalf. The Company retains the copyright in databases of personal information of our customers and website users.

We may also use your details to send you newsletters and promotions, and to conduct online surveys or surveys by telephone and other communications via email, electronic messaging services, telephone, or post. We will not engage in the practice of direct marketing by means of unsolicited electronic communications unless you are already a customer of the Company or have given your consent to such processing.

If you apply for employment at the Company, we use the personal information you supply to process your job application.

Other than as set out in this privacy policy we will not share your personal information with third parties for marketing or any other purposes without your consent unless we are required to do so by law.

When and to whom do we disclose your information?

We may share your personal information with Battery Pro George's accountants, lawyers, suppliers, and business consultants only if it is warranted. We also may transfer personal information to third parties who act on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of our website, marketing, advertising, data management, or technical support and legal input required.

These third parties have contracted with us to only use personal information for the agreed upon purpose, and not to sell personal information to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy.

We may disclose your personal information to a third party if the business or a part of it and the customer information connected with it is sold, assigned, or transferred, in which case we would require the buyer, assignee or transferee to treat your personal information in accordance with this Privacy Policy.

Also, we may disclose your personal information to a third party if we are required to do so because of an applicable law, requests from public and government authorities (including court order, subpoena, or governmental regulation), even outside your country of residence; if we need to enforce our terms and conditions; when we believe in good faith that the disclosure is necessary to protect legal rights, the security or integrity of Battery Pro George's website and business activities; to protect your safety or the safety of others; as part of any criminal or other legal investigation or proceeding in your country or in other countries; or to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction. Third party service providers have access to personal information needed to perform their functions but may not use it for other purposes. Further, they must process the personal information in accordance with this privacy policy and as permitted by South African data protection legislation.

Your personal information may also be processed, accessed, or stored electronically in countries outside South Africa (such as remote cloud servers). Such countries may offer a different level of protection of personal information. If we transfer your personal information to external companies in other jurisdictions, we will make sure to protect your personal information by applying the level of protection required under applicable data privacy laws.

How do we protect your personal information?

We will only process your personal information when including some or all the following arrangements:

- We have obtained your prior consent:
 - o all information required will be recorded on our mutual agreements, contracts and correspondence, and your signature(s) will confirm consent.
 - o All e-mails and electronic data received from you via our web site and your e-mail address(es) will be deemed to have your consent.
- The processing is necessary to carry out actions for the conclusion or performance of an agreement and / or contract to which you are a party.
- The processing is necessary to comply with our legal or regulatory obligations.
- The processing protects your legitimate interest; and / or
- The processing is necessary for our legitimate interests or the legitimate interests of a third party to whom the personal information is supplied and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal information on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such "legitimate interests" may include data processing activities performed:

- To benefit from cost-effective services (e.g. we may opt to use certain processes offered by suppliers to process information).
- To offer our products and services to our customers.

- To prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture, and networks.
- To sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and
- To meet our corporate and social responsibility objectives.

We use appropriate technical, administrative, and physical safeguards to protect the information collected through our website and administrative systems against losses and unlawful access. We will continuously investigate and implement safeguards against new risks. Unfortunately, no organization can guarantee the absolute security of information, especially information transmitted over the internet.

Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you. Customers and website users where necessary, and whether applicable now or in the future undertake not to use any username or passwords relating to any other person.

Moreover, when handling your personal information, we

- only collect and process personal information, which is adequate, relevant, and not excessive, as required to meet the above purposes; and
- ensure that your personal information remains up to date and accurate.

For the latter, we may request you to confirm the personal information we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal information is kept up to date.

Notification of security compromises

We will notify you and the Information Regulator in writing promptly - should your personal information be accessed illegally (breached) unless the identity of the data subject cannot be established; considering the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system. This notification will include sufficient information to allow you to take preventative measures against potential consequences of the compromise.

We may only delay notification of the data subject if a public body responsible for the prevention, detection or investigation of offenses or the Information Regulator determines that notification will impede a criminal investigation by the public body concerned and it will be in writing and communicated to the data subject in a prescribed manner.

- A description of the possible consequences of the security compromise.
- A description of the measures that we, responsible party, intends to take or has taken to address the security compromise.
- A recommendation about the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise.
- If known to the responsible party, the identity of the unauthorized person who may have accessed or acquired the personal information.

The Information Regulator may direct a responsible party to publicize, in any manner specified, the fact of any compromise to the integrity or confidentiality of personal information, if the Information Regulator has reasonable grounds to believe that such publicity would protect a data subject who may be affected by the compromise.

An operator / data processor is not required to notify the Information Regulator or data subjects where there are reasonable grounds to believe that there has been a data breach. It must, however, notify the responsible party/data controller of the suspected data breach.

Who has access to your personal information and to whom are they transferred?

We will not sell, share, or otherwise transfer your personal information to third parties other than those indicated in this Privacy Policy.

During our activities and for the same purposes as those listed in this Privacy Policy, your personal information can be accessed by or transferred on a strictly need-to-know basis to the following categories or recipients:

- Our personnel.
- Our independent agents or brokers (if any).
- Our suppliers and services providers that provide services and products to us.
- Our IT systems providers, cloud service providers, database providers and consultants.
- Our business partners who offer products or services jointly with us or with our subsidiaries or affiliates.
- Any third party to whom we assign, cede, or novate any of our rights or obligations.
- Our advisors and external lawyers; and
- Any national and/or international regulatory, enforcement, public body, or court where we are required to do so by applicable law or regulation or at their request.

The above third parties are contractually obliged to protect the confidentiality and security of your personal information, in compliance with applicable law.

We sometimes might work with affiliates and other trusted partners and service providers located outside of your country of domicile. The personal information we collect from you may therefore also be processed, accessed, stored in, or transferred to a country outside South Africa, which may not offer a level of protection of personal information which is substantially like the protections as may be enjoyed in your country of domicile.

If we transfer your personal information to any third party, we will do so in accordance with data protection laws applicable.

How do we deal with information from individuals under the age of 13?

Our website and administrative system are not directed at children, and we do not knowingly collect any information of individuals under the age of 13 other than the information you might offer voluntarily.

How long do we store personal information?

We will only retain your personal information for as long as necessary to fulfil the purpose for which they were collected or to comply with legal or regulatory requirements. Thereafter it will be removed from our systems and files. Once removed these records will be destroyed to prevent the intelligent re-constructing of records for illegal access.

What are your rights and how can you exercise them?

Whenever we process personal information, we take reasonable steps to keep your personal information accurate and up to date for the purposes for which they were collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the law.

If you wish to contact us regarding the use of your personal information or want to object in whole or in part to the processing of your personal information, please **contact us** at george@batterypro.co.za, or telephone number 083 320 3288, or at Battery Pro George, 27 Albert Street, George, 6529.

You may exercise the following rights:

- To object to us processing the information (- [Form 1](#) on p.12 of POPIA Regulation, 2018).
- To access the information and correct it (- [Form 2](#) on p.14 POPIA Regulation, 2018).
- To complain to the Information Regulator (- [Form 3](#) on p.20 POPIA Regulation, 2018).
- To access your personal information as processed by us and, if you believe that any information relating to you is incorrect, obsolete, or incomplete, to request its correction or updating.
- To request the erasure of your personal information or the restriction thereof to specific categories of processing.
- To withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal.
- To object to a channel of communication used for direct marketing purposes; and
- To request portability, where applicable, of your personal information i.e., that the personal information you have provided to us, are returned to you, or transferred to the person of your choice, in a structured, commonly used, and machine-readable format.

To facilitate the most efficient answer, please provide the following information:

- Name of the website you are referring to.
- Your relationship and interaction with us.
- The description of the information you would like to receive from us.

How will you be informed of the changes to our Privacy Notice?

Any future changes or additions to the processing of your personal information as described in this Privacy Policy will be published on our web site.

What is a cookie?

Cookies are small text files that are sent to your computer when you visit a website. Cookies on any Battery Pro George web sites do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences and generally improving your experience of a website.

We can store cookies on your machine if they are essential to the operation of this site, but that for all others we need your permission to do so.

Battery Pro George sites may use some non-essential cookies. We do not do this to track individual users or to identify them, but to gain useful knowledge about how the sites are used so that we can keep improving them for our users. Without the knowledge we gain from the systems that use these cookies we would not be able to provide the service we do.

- The types of cookies we may use:
 - If you decide to set the language, font-size or specific version of the site (e.g. high-contrast), we use “user interface customization cookies”. Once set, you do not need to specify your preferences again on another visit to the site.
 - If you use parts of the site that require registration to access content, we might place an “authentication cookie” on your computer. This allows you to leave and return to these parts of the site without re-authenticating yourself.
 - If you have Adobe Flash installed on your computer (most computers do) and you use video players, we may store a “flash cookie” on your computer. These cookies are used to store data needed to play back video or audio content and store the user’s preferences.
 - We like to understand how visitors use our websites by using web analytics services. They count the number of visitors and tell us things about the visitors’ behaviour overall – such as identifying the search engine keywords that lead the user to the site, the typical length of stay on the site or the average number of pages a user view. For this purpose, we may place a “first party analytics cookie” on your computer.

- We may also use services such as Google Analytics to track web statistics. In this case, Google will place a “3rd party cookie” on your computer. This is also the case when we use Google Maps.

Any data collected by using these cookies will be stored and managed by us or one of our trusted affiliates.

How to control cookies

If you do not want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it, or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies which are set on your device, then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers. However, if you do not accept our cookies, you may not be able to use all functionalities of your browser software or our website.

Closure

Whenever we process personal information, we take reasonable steps to keep your personal information accurate and up to date for the purposes for which they were collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the law.

If you wish to contact us regarding the use of your personal information or want to object in whole or in part to the processing of your personal information, please **contact us** at george@batterypro.co.za, or telephone number 083 320 3288, or at Battery Pro George, 27 Albert Street, George, 6529.