

Rectron Privacy Policy

Introduction

Welcome to our privacy policy. We are Rectron (Pty) Ltd (Registration number 1995/003772/07) and this is our plan of action when it comes 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 and can be used to identify you or that person (**personal information**).

We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.

Audience

This policy applies to you if you are:

- a visitor to our website; or
- a customer who has ordered or requested the goods or services that we provide.

This policy applies to you under certain circumstances.

Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

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; and
- non-personal statistical information collected and compiled by us.

Common examples

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

- **identifying information** – such as your company name, name, or identification number of any kind;
- **contact information** – such as your company phone number, email address, contact phone number;
- **address information** – such as your company physical or postal address or your address;
- **demographic information** – such as your gender or marital status.

Sensitive personal information

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;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical health collected for public health reasons;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** – including your membership of a trade union; and

Acceptance

Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

You may not order our goods or request our services if you do not accept this policy.

Legal capacity

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

Changes

We may change the terms of this policy at any time by updating this web page. 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 or services. 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.

Collection

On registration

Once you register as a Rectron Reseller, or on Rectron's Reseller Portal (www.rctzone.co.za) you will no longer be anonymous to us. You will provide us with certain personal information when you or submit your Reseller Application.

This personal information will include:

- your name and surname;
- your email address;
- your mobile number;
- your company password for orders;
- your date of birth.

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.

We collect certain information on registration, when you register as a Rectron Reseller.

On order or request

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

We collect certain information when you order our goods or request our services from us.

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 the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

We collect certain information from your web browser, including your Internet usage information when you visit our website.

Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

We collect certain information from cookies that we may send to your computer to try and give you a personalised experience.

Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

We collect certain information from web beacons on our website to compile anonymous information about our website.

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 of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional goods or services.

Recording calls

We may monitor and record any telephone calls that you make to us, in compliance with relevant monitoring laws.

Purpose for collection

We may use or process any goods or 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 collecting orders or requests for and providing our goods or services;
- **marketing purposes** - such as pursuing lawful related marketing activities;
- **business purposes** - such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** - such as handling claims, 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.

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the website or your orders. We may wish to provide you with information about new goods or services in which we think you may be interested.

This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt-into them.

We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.

Disclosure

Sharing

We may share your personal information with:

- Our employees and/or third-party service providers who assist us to interact with stakeholders via our website, email or any other method, for the ordering of goods or when delivering goods, and thus need to know personal information in order to assist us to communicate properly and efficiently.
- Our divisions, affiliates and/or partners (including their employees and/or third-party service providers) for them to interact directly with stakeholders via email or any other method, for purposes of sending marketing material regarding any current or new goods or services, new features, special offers or promotional items offered by them (unless opted out from receiving marketing material).
- Law enforcement, government officials, fraud detection agencies or other third parties when we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity, or to investigate violations of our Terms and Conditions, or obligated to do so by law.
- Our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, technology services etc.).
- Our suppliers so that they may liaise directly with customers and clients regarding any faulty goods purchased which requires their involvement; and
- Third-Party Sellers for purposes of sending customers or clients invoices for any goods purchased from such Third-Party Seller, in which case disclosed information will be limited to email addresses.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

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.

We may disclose personal information to third parties if required for legal reasons.

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.

Security

We take the security of personal information very seriously and 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 authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

Accurate and up to date

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. You are able to review or update any personal information that we hold on 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 making any corrections to your personal information.

Please keep your personal information accurate and up to date by accessing your account online, emailing us, by phoning us.

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.

We will only retain your personal information for as long as is necessary.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

We may transfer your personal information outside the country in which it was collected to a foreign country.

Your rights regarding your information

Provided that you give us suitable and adequate proof of your identity, you have the right:

- To know which records we hold about you;
- If our right to process your personal information is based on your consent, to withdraw such consent at any time, provided that this shall not affect the lawfulness of processing which occurred prior to such withdrawal;
- To object to the further collection, use, sharing or processing of your personal information by us at any time where such processing activities are not required by us to comply with our obligations under any agreement we have with you, to exercise our rights, or for such other purposes as may be required or permitted by applicable law; and
- to require us to correct, erase or cease processing information or records we hold about you based on your consent, or that we are no longer permitted to retain, or which are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained.

Any of the above can be done by contacting us by phone or email. We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.

You may exercise your rights regarding your information at any time.

Complaints

Please notify us via email if you have any concerns about the processing of your personal information.

If your concerns are not satisfactorily resolved, you may lodge a complaint with the South African Information Regulator at complaints.IR@justice.gov.za or +27 (0) 10 023 5200.

You may raise concerns about the processing of your personal information or lodge a complaint with the South African Information Regulator if your concerns were not satisfactorily resolved.

Limitation

We 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.

Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

Tel: (011) 203 1000

e-mail address: compliance@rectron.co.za