

THE SOUTH AFRICAN WIRE BUSINESS COUNCIL (NPC)

Registration Number: 2002/000697/08

PRIVACY POLICY

INTRODUCTION

The South African Wire Business Council (NPC) is committed to protecting your Personal Information and respecting your constitutional right to privacy.

In this Privacy Policy, any reference to “SAWA”, “we”, “us” or “our” shall mean The South African Wire Business Council (NPC);

This Privacy Policy describes how we process your Personal Information, in accordance with the requirements of the Protection of Personal Information Act No 4 of 2013 (“the Act”)

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1. APPLICATION OF THIS PRIVACY POLICY

- 1.1 In terms of the Act, SAWA is a “Responsible Party” in respect of your Personal Information as we determine the purpose of and means for processing your Personal Information;
- 1.2 This Privacy Policy applies to the processing by us, or on our behalf, of the Personal Information relating to our “Data Subjects” which include our employees, members, service providers, suppliers, website users and any other persons that engage with us;

2. COLLECTION OF PERSONAL INFORMATION

“**Personal Information**” refers to information relating to an identifiable, living, natural person, and where it is applicable, and identifiable existing juristic person;

SAWA will only collect such Personal Information as is appropriate, adequate and relevant for a specific, explicitly defined and lawful purpose related to a function or activity of SAWA. Personal Information is collected in the following ways:

- 2.1 We collect Information directly from you through your interaction with us via email and other electronic communication, telephonic conversation, physical interaction, and through your interaction on our website;
- 2.2 We will notify you in advance should we be required to collect your Personal Information from another source than yourself. Any collection of Personal Information from another source will be performed in accordance with the requirements of the Act;

3. PROCESSING OF PERSONAL INFORMATION

SAWA process various categories of Personal Information, including but not limited to:

- 3.1 **Identity Information**, which includes names, identity number, registration number, date of birth, etc;
- 3.2 **Contact Information**, which includes residential, postal, billing and delivery addresses, email addresses and telephone numbers;
- 3.3 **Financial information**, which includes salary details, bank account details, income tax reference numbers, value added tax reference numbers, etc;
- 3.4 **General information**, which includes general and private correspondence, personal opinions, views, or preferences;
- 3.5 **Technical information**, which includes online information relating to the use of our website;

4. PROCESSING OF SPECIAL PERSONAL INFORMATION

“**Special Personal Information**” refers to information relating to your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information or information relating to your criminal behavior;

SAWA will generally not process Special Personal Information about you unless:

- 4.1 Processing is carried out with your consent;
- 4.2 Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- 4.3 Processing is necessary to comply with an obligation in terms of international public law;
- 4.4 The information has deliberately been made public by you;

In certain circumstances we may process Special Personal Information about you including:

- 4.5 Information relating to your criminal behavior during employee hiring procedures;
- 4.6 Information relating to your health in order to comply with regulations regarding screening practices;
- 4.7 Information relating to your religious beliefs for food provision and catering requirements;

5. PURPOSES FOR PROCESSING PERSONAL INFORMATION

We shall advise you of the purpose for collecting and processing your Personal Information in accordance with the requirements of the Act. Depending on the nature of your interaction with us, we may process your Personal Information for the following purposes:

- 5.1 To record, update and maintain profiles of our employees, members, service providers, suppliers, and other relevant “Data Subjects” on our systems for purposes of general administration;
- 5.2 Performing our duties and responsibilities towards our employees in relation to relevant legislation;
- 5.3 Engaging with our members regarding the provision of our services;
- 5.4 Engaging with suppliers and service providers regarding the supply of their goods and services;
- 5.5 Engaging with government institutions regarding funding and industry related aspects;
- 5.6 To ensure compliance with relevant legislation and other statutory obligations;
- 5.7 For any other lawful activities in relation to our normal business operations;

6. SHARING OF PERSONAL INFORMATION

We will not intentionally disclose your Personal Information to any third party without informing you of the specific purpose thereof and requesting your consent before any such disclosure, unless we are obliged to act otherwise in terms of law.

We will request your consent to share your Personal Information under the following circumstances:

- 6.1 Providing information to suppliers, service providers and contractors that have agreed to such security measures as would be consistent with the Act, this Privacy Policy or similar terms which would provide appropriate levels of protection of your Personal Information;
- 6.2 Providing information to our employees and contractors to the extent that they require such Personal Information in the provision of a service to us subject to conditions of entering into written agreements concerning the confidentiality, non-disclosure and data protection of your Personal Information;
- 6.3 Providing information to Government Departments and Regulatory Bodies when we are required by law to comply with such law or legislation, or when such disclosure of information is required to protect and defend rights;
- 6.4 We will not sell, rent or trade your Personal Information to any third party;

7. TRANSFER OF INFORMATION ACROSS BORDERS

We will notify you should we be required to transfer your Personal Information to a third party that is situated outside South Africa.

We will only transfer your information to a third party situated in another country should the third party be bound to similar laws regarding the protection of information as is prevalent in South Africa.

If the third party is situated in another country with no, or limited legislation regarding the protection of Personal Information, we will only transfer your Personal Information if the third party agrees by way of a written agreement to the application of such appropriate measures as to ensure the security and safety of your Personal Information in line with the Act and this Privacy Policy.

Circumstance where we may transfer you Personal Information across borders may include:

- 7.1 Personal Information transferred to third parties in order to promote our members products;
- 7.2 Personal Information transferred to a third party service provider with regards to data storage servers and other technology hosting services;
- 7.3 Personal Information transferred to a third party service provider in relation to the attendance of international trade shows and other promotional events on behalf of members;

8. STORAGE OF PERSONAL INFORMATION

We store your Personal Information in the following methods:

- 8.1 At our premises in the form of hard copies;
- 8.2 In electronic format on our servers, personal computers and mobile devices;
- 8.3 At the premises of contractors and third party service providers;
- 8.4 Personal Information transferred to a third party service provider with regards to data storage servers and other technology hosting services;

9. SECURITY MEASURES

Taking into account the inherent security limitations and risks associated with the processing of information by means of technology, we strive to protect your Personal Information as would be reasonably possible by implementing such measures, protocols and policies to ensure that your Personal Information is not unlawfully accessed, copied, removed, contaminated or distributed.

Our security measures include the following:

- 9.1 Installation of security systems to premises and storage facilities, including access control;
- 9.2 Use of technological software and protocols for safeguarding data stored in electronic format;
- 9.3 Conducting regular data security risk assessments;
- 9.4 Assessment of security protocols provided by operators and service providers;
- 9.5 Monitoring employee and contractor conduct in respect of confidentiality and security agreements;
- 9.6 Provide regular training to employees regarding the protection of Personal Information;
- 9.7 Implementing, updating and monitoring of information protection protocols;
- 9.8 Analyzing security breaches and implementing appropriate measures;
- 9.9 Creating back-up of information for safeguarding and business continuation purposes;

10. RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for such a period as would be appropriate, also taking into account:

- 10.1 The current nature of your engagement with us;
- 10.2 Requirements of any laws and regulations regarding the retention of records;
- 10.3 Our reasonable requirement for retention related to the performance of our operations;
- 10.4 Your specific agreement to us retaining your information for a further period;

11. YOUR RIGHTS IN RESPECT TO YOUR PERSONAL INFORMATION

In terms of the Act, you have certain rights in respect to your Personal Information, including the right:

- 11.1 to have your Personal Information processed in accordance with the conditions for the lawful processing of Personal Information as contained in the Act;
- 11.2 to be notified of any collection of your Personal Information, and the purpose thereof;
- 11.3 to access your Personal Information;
- 11.4 to request, where necessary the correction, destruction or deletion of your Personal Information;
- 11.5 to object, on reasonable grounds to the processing of your information;
- 11.6 to object to the processing of your Personal Information for purposes of direct marketing;
- 11.7 not to have your Personal Information processed for purposes of direct marketing by means of unsolicited electronic communications;
- 11.8 to request restriction of the processing of your Personal Information;
- 11.9 to withdraw previous consent given to the processing of your Personal Information;
- 11.10 to submit a complaint to the Information Regulator;
- 11.11 to institute civil proceedings;
- 11.12 to disable all cookies associated with our website, by setting your browser to do so;

12. PERSONAL INFORMATION OF CHILDREN

We understand the importance of protecting the Personal Information and rights of children.

- 12.1 We do not knowingly process the Personal Information of children;
- 12.2 Our services and website do not target persons under the age of 18 years;
- 12.3 Should there be a circumstance where we are required to process the information of a child we shall perform such processing in accordance with the requirements of the Act;

We kindly request that you contact our Information Officer should you, in your capacity as a competent person in relation to a child, become aware of any information of such child that is in our possession.

13. DIRECT MARKETING

- 13.1 We may process Personal Information for the purposes of direct marketing by way of electronic communication;
- 13.2 We will only provide you with direct marketing material if you have given your specific consent thereto by opting-in to receiving such direct marketing material;

14. THIS PRIVACY POLICY

We may amend, change or update this Privacy Policy from time to time to provide for any changes to legislation, or such reason we believe necessitates such amendment.

We will advise you as far as reasonably possible when changes have been made to this Privacy Policy.

Please contact our Information Officer should you have any questions regarding this Privacy Policy, or should you require any further information regarding the protection of your Personal Information.

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