

EXTERNAL PROCESSING NOTICE FOR

Applicants, Business Partners, Contractors, Vendors, Service Providers, Suppliers, Customers and Clients, Marketing, Regulators and Public Bodies, Tenants.

IN TERMS OF SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

1. PURPOSE OF THIS NOTICE

- 1.1 **We, Academy Brushware** situated at 38 5th Avenue, Bredell, Kempton Park, Gauteng 1619, and our branches, collectively referred to as “us”, “we”, and “the Group”, in our capacity as a Responsible Party, for the purposes set out herein, will have to process your Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 2013 (hereinafter referred to as “**POPIA**”), which regulates and controls the processing of a legal entity’s and or an individual’s Personal Information in South Africa (also referred to as the “**Data Subject**”), which processing includes the collection, use, and transfer of a Data Subject’s Personal Information.
- 1.2 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2 DEFINITIONS

In this Processing Notice, the following words and phrases will have the meanings assigned thereto below:

- 2.1 “**Consent**”, means the consent, you in your capacity as Data Subject, may give to us, under certain circumstances, to process your Personal Information. This consent must be voluntary, specific, and informed. Following this, once we have explained to you why we need your Personal Information and what we will be doing with it and you have read this Processing Notice, you may then, in relation to certain uses of the information, give us your permission to use it, which permission or consent can be demonstrated by way of your actions that are representative of voluntary, specific and informed expression of will in terms of which permission is given for the Processing of Personal information;
- 2.2 “**Data Subject**”, means you, the person in relation to whom the Personal Information relates;
- 2.3 “**Operator**” means any person who processes your Personal Information on our behalf as a contractor, in terms of a contract or mandate, without coming under our direct authority. These persons for illustration purposes may include verification agencies, advertising, and public relations agencies, call centres, service providers, auditors, legal practitioners, organs of state, government, provincial and municipal bodies;
- 2.4 “**PAIA Manual**”, means the manual that must be compiled and made available by a private body in terms of section 51 of the Promotion of Access to Information Act No.2 of 2000, as amended, detailing, amongst other things, the categories of records held by that private body and the procedure for accessing such records. The Academy Brushware PAIA Manual is accessible at the following link:
<https://academybrushware.co.za/terms-and-conditions/>
- 2.5 “**Personal Information**”, means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing juristic person, including, but not limited to:
- 2.5.1 **In the case of an individual** it includes your name, address, contact details, date of birth, gender, place of birth, identity number, passport number, bank details, details about your employment, tax number, and financial information, vehicle registration, dietary preferences, financial history, information about your next of kin and or dependants and information relating to your education or employment history; and
- 2.5.2 **Special Personal Information** includes information relating to your race, pregnancy, national, ethnic or social origin, colour, physical or mental health, disability, criminal history, including offences committed or alleged to have been committed, membership of a trade union and biometric information, such as images, fingerprints and voiceprints, blood typing, DNA analysis, retinal scanning, and voice recognition.

2.5.3 **In the case of a legal entity**, it includes your name, address, contact details, registration details, financial and related history, B-BBEE score card, registered address, description of operations, bank details, details about your employees, business partners, customers, tax number, VAT number, and other financial information.

- 2.6 **"Processing" / "process" or processed**", means in relation to Personal Information, the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; merging, linking, as well as restriction, degradation, erasure or destruction of information; or sharing, transfer and further processing, including by physical, manual and automatic means. This is a wide definition and therefore includes all types of usage of your Personal Information by us including the initial processing when we first collect your Personal Information and any further and ongoing processing that is in accordance or compatible with the purpose of collection;
- 2.7 **"Purpose"** means the reason why your Personal Information needs to be processed by us;
- 2.8 **"Responsible Party"**, means Academy Brushware, the person who determines the purpose of and means for processing your Personal Information;
- 2.9 **"You"** means you, the potential or actual employee, director, learner, or bursary holder, known under POPIA, as the Data Subject, who will be providing us with your Personal Information, for processing.

3 APPLICATION

This Processing Notice applies to the following persons:

- 3.1 **Applicants:** persons who wish to apply to do business with us, including the sale or provision of goods or services to us, or who want to purchase from us certain goods or services, including persons or legal entities who submit applications to do business, credit applications and or quotations or tenders; or applicants who apply for a bursary, funding, CSI opportunity or a sponsorship from us.
- 3.2 **Business partners:** whether in their capacity as Operator/s or not, who provide services, goods and other benefits to us our employees or to our customers, clients and service providers, such as medical aids, pension or provident funds, administrators, financial service providers, advertising, marketing or PR agencies, wellness or health and medical providers. (Operators to refer to terms and conditions of the Operator Agreement and the Academy Data Policy which shall apply to all activities performed by the Operator).
- 3.3 **Contractors, Vendors, Service Providers, Suppliers:** persons who are desirous of, or who do provide us with goods, and services, or who provide professional consulting or management services or who we provide goods and services to, including general consultancy services and any infrastructure or property related services and who we interact and communicate with, either physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, and or who come onto our properties, sites, facilities and or who enter our offices, warehouses and buildings.
- 3.4 **Customers and Clients: potential and actual** - persons who are desirous of, or who do use and or purchase our products or services, who receive marketing communications and / or who communicate with us physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, and / or who come onto our sites, facilities and / or who enter our offices; tenants who lease and occupy our premises or properties.
- 3.5 **Interactors:** persons who interact with us, physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, or who come onto our sites and / or who enter our offices or facilities.
- 3.6 **Recipients of Marketing and Promotional Materials and Communications;** persons who have given us permission, as a customer, or in the context of a sale of our goods or services, or who have entered a competition or promotion carried out by any entities in the Group, permission to provide them with marketing materials, direct marketing materials and / or other promotional related materials and communications.
- 3.7 **Regulators and Public Bodies:** persons who we engage with in order to discharge legal and public duty obligations, including SARS, National Treasury, Department of Labour, the Financial Sector Conduct Authority.

- 3.8 **Users of our Sites:** persons who use our websites, applications, mobile applications, or social media portals or platforms whether in order to find out more about us, to make enquiries about us, or our products or services or where persons want to do business with us be it providing or selling to us or receiving or buying from us, certain goods and services, etc.

4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

Your personal information will be processed by us for the following purposes:

- 4.1 **Due diligence purposes:** To carry out a due diligence before we decide to engage or interact with you or to do business with you, including obtaining and verifying your credentials, including your business details, medical status, health history and related records, education and employment history and qualifications, credit and financial status and history, tax status, B-BBEE status, and or any performance or vendor related history.
- 4.2 **Contract purposes:** To investigate whether we are able or willing to conclude a contract with you based on the findings of any due diligence detailed above, and if the assessment is in order, to conclude a contract with you.
- 4.3 **To process transactions and render or provide or receive goods and services:** To perform under any contract which has been concluded with you, including carrying out all contractual obligations, exercising all contractual rights, assessing or communicating requirements, manufacturing, packaging, ordering, delivering, and / or responding to, or submitting queries, complaints, returns or engaging in general feedback, or acting in such a manner as to personalize any goods or services, and to make recommendations related to us or our or your operations.
- 4.4 **Attending to financial matters pertaining to any transaction:** To administer accounts or profiles related to you or your organization including registrations, subscriptions, purchases, billing events, fees, costs and charges calculations, quoting, invoicing, receipt of payments or payment of refunds, reconciliations and financial management in general.
- 4.5 **Communications:** To make contact with you and to communicate with you generally or in respect of our or your requirements, or or to respond to you in order to comply with your specified or general instructions, and or specifically through various platforms such as social media and email.
- 4.6 **Risk assessment and anti- bribery and corruption matters:** To carry out vendor, organizational and enterprise wide risk assessments, in order to detect and prevent bribery, corruption, fraud and abuse, to comply with all applicable laws, as well as to identify and authenticate your access to and to provide you with access to our goods, services or premises and generally to ensure the security and protection of all persons including employees, and persons when entering or leaving our sites and operations or facilities and / or to exercise our rights and to protect our and others' rights and / or property, including to take action against those that seek to violate or abuse our systems, services, customers or employees and / or other third parties where applicable.
- 4.7 **Legal obligations, litigation, insurance and public duties:** To comply with the law and our legal obligations, including the requirements to register with Regulators, obtain and hold permits and certificates, register for VAT, Tax, PAYE, SDL, COIDA and UIF, customs and excise etc. and to pay levies and fees due in respect thereof by the Group or others, to submit legal or statutory reports or provide various regulatory or statutory notices or returns, to litigate and / or to pursue or defend legal claims or collections, to attend to insurance claims and related procedures, to respond to a request or order from a SAP official, investigator or court official, regulator, or public authority.
- 4.8 **Operational issues and in compliance with laws and to manage contracts -** To communicate, enforce and ensure you comply with our policies, including in relation to legal obligations, claims or actions or legal requirements and conducting investigations and incident responses, including reviewing your communications in these situations in accordance with relevant internal policies and applicable laws.
- 4.9 **Travel I:** To facilitate business travel, travel-related support including conference attendance, bookings and emergency support services.
- 4.10 **B-BBEE –** To comply with B-BBEE and to monitor or report B-BBEE requirements, opportunities and related diversity issues, including using your details in B-BBEE reports and score cards.

- 4.11 **Security purposes:** to permit access to our offices, facilities, manufacturing or parking areas, as well as to controlled areas, for the purposes of monitoring via CCTV, your interaction and access in and from our facilities described above, and for general risk management, security and emergency incident control purposes as well as for data and cybersecurity purposes.
- 4.12 **Internal research and development purposes:** To conduct internal research and development for new content, products, and services, and to improve, test, and enhance the features and functions of our current goods and services.
- 4.13 **Sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings):** To comply with our legal obligations and to change our business structure we may disclose your Personal Information in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third parties. We may also provide relevant parts of your Personal Information to any potential acquirer of or investor in any part of the Group's business for the purpose of that acquisition or investment.
- 4.14 **Marketing and electronic communications related thereto :** To communicate and offer to you where you are our customer, or where you have requested or opted in or may have registered to receive same from time to time our marketing material relating to our goods and services and or other notifications, programs, events, or updates that you may have registered or asked for, and to send you offers, advertising, and marketing materials, save where you have opted out of this activity. To the extent that you have not previously objected or withheld your consent regarding the said marketing communication, you may opt - in to receive the communication, by providing written consent or using the provided opt - in facility.
- 4.15 **Events, advertising and public relations materials and publications:** for the purposes of making contact with you and or attending to your enquiries and requests in relation to our advertising and public relations materials and publications and or events and functions and for providing you from time to time with information pertaining to the Group, or its subsidiary businesses' advertising and public relations materials and publications, and or events and functions and to invite you to attend functions and events or our request for your appearance in advertising and public relation materials and publications.
- 4.16 **Internal Research and development purposes – consent required –** To conduct internal research and development for new content, products and services and to improve, test and enhance the features and functions of our current goods and services.

5. DETAILS OF THE PERSONAL INFORMATION WE COLLECT FROM YOU

We will collect your Personal Information set out below for the purposes described in this Processing Notice.

- 5.1. The supply of certain Personal Information is mandatory for us to comply with our legal, contractual, and operational obligations. Failure to provide this information may prevent us from: (a) establishing or continuing a relationship with you; (b) engaging with you; (c) fulfilling our legal obligations; or (iv) providing you with necessary services related to your business with us, application or position with us. Additionally, we may request that you voluntarily provide us with Personal Information, which, while the supply of the Personal Information is not mandatory, can enhance your experience in relation to our services or product offering.
- 5.2. Where the Personal Information is collected directly from you, we will clearly indicate before collecting the Personal Information whether the supply of the Personal Information is voluntary or mandatory. In any other case, we will clearly indicate as soon as reasonably practicable after the Personal Information has been collected whether the supply of the information is voluntary or mandatory.
- 5.3. We will collect the following Personal Information:
- 5.3.1. **Your or your employer or organization's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regarding the possession of dangerous weapons, and other contact information including details of your employer, memberships or affiliations, such as the name of your employer or organization that you are a member of, information about your colleagues or those within your organization, your status with an organization, and similar data, which are required for various legitimate interest, contractual and / or lawful reasons.

5.3.2. **Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as your race (B-BBEE related), religion (correct and fair treatment related), sexual and medical history including any medical conditions (to comply with laws and related to correct and fair treatment issues), trade union matters (to comply with laws and related to correct and fair treatment issues), and financial, credit, deviant and criminal history (to protect our legitimate interests and to perform risk assessments), as well as children's details (benefits related).

5.3.3. **Account Information**, including banking details, security-related information (including usernames and passwords, authentication methods, and roles), service-related information (including purchase history and account profiles), billing-related information (including payment, shipping, and billing information), and similar data, all which are required to perform contractual matters and / or to provide you access to services.

5.3.4. **User Content**, such as content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our websites, applications, mobile applications, or social media portals or platforms including information in alerts, folders, notes, and shares of content), and similar data which are required to perform contractual matters and / or in order to provide you access to services or attend to queries.

5.3.5. **Device & Browser Information**, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

5.3.6. **Usage Information and Browsing History**, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares, streams, and display or playback details), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), and similar data which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

5.3.7. **Location Data**, such as the location of your device, your household, and similar location data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

5.3.8. **Demographic Information**, such as country, preferred language, age and date of birth, marriage status, gender, physical characteristics, personal or household/familial financial status and metrics, military status, and similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

5.3.9. **Your Image**, such as still pictures, video, voice, and other similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

5.3.10. **Identity Information**, such as government-issued identification information, tax identifiers, social security numbers, other government-issued identifiers, and similar data, which are required to comply with laws and public duties.

5.3.11. **Financial Information**, such as billing address, credit card information, billing contact details, and similar data., tax numbers and VAT numbers, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place and / or which are required to comply with laws and public duties.

5.3.12. **Career, Education, and Employment Related Information**, such as job preferences or interests, work performance and history, salary history, status as a veteran, nationality and immigration status, demographic data, disability-related information, application information, professional licensure information and related compliance activities, accreditations and other accolades, education history (including schools attended, academic degrees or areas of study, academic performance, and rankings), and similar data, which are required for contractual or employment related matters or which are required to comply with laws and public duties.

5.3.13. **Health records** such as medical status and history, examinations, blood type, medical aid history, disability-related information, biometrics, medicals, psychometrics and similar data, which are required for contractual or employment related matters or which are required to comply with laws and public duties.

5.3.14. **Social Media and Online Content**, such as information placed or posted in social media and online profiles, online posts, and similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries and generally for the purposes of advertising, marketing and related communications.

6. SOURCES OF INFORMATION - HOW AND WHERE DO WE COLLECT YOUR PERSONAL INFORMATION FROM?

Depending on your requirements, we will collect and obtain personal information about you either directly from you, from certain third parties or from other sources which are described below:

6.1 **Direct collection:** You provide personal information to us when you:

- 6.1.1 use our websites, applications, mobile applications, or social media portals or platforms.
- 6.1.2 interact with us.
- 6.1.3 enquire about, or search for our goods or services.
- 6.1.4 create or maintain a profile or account with us.
- 6.1.5 conclude a contract with us.
- 6.1.6 purchase or subscribe to our goods or services..
- 6.1.7 use our goods or services.
- 6.1.8 purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us.
- 6.1.9 create, post, or submit user content on our websites, applications, mobile applications, or social media portals or platforms.
- 6.1.10 register for or attend one of our events, functions or locations.
- 6.1.11 request or sign up for information, including marketing material.
- 6.1.12 communicate with us by phone, email, chat, in person, or otherwise.
- 6.1.13 complete a questionnaire, survey, support ticket, or other information request form.
- 6.1.14 when you submit a quotation, or offer to do business with us, a tender or when you conclude a contract with us.
- 6.1.15 express an interest in a bursary or sponsorship.

6.2 **Automatic collection:** We collect personal information automatically from you when you:

- 6.2.1 search for, visit, interact with, or use our websites, applications, mobile applications, or social media portals or platforms.
- 6.2.2 use our goods or services (including through a device).
- 6.2.3 access, use, or download content from us.
- 6.2.4 open emails or click on links in emails or advertisements from us.
- 6.2.5 otherwise interact or communicate with us (such as when you attend one of our events, functions or locations, when you request support or send us information, or when you mention or post to our social media accounts).

6.3 **Collection from third parties:** We collect personal information about you from third parties, such as:

- 6.3.1 your organization and others with whom you have a relationship with that provide or publish personal information related to you, such as from our customers or from others when they create, post, or submit user content that may include your personal information.
- 6.3.2 regulators, professional or industry organizations and certification / licensure agencies that provide or publish personal information related to you.

- 6.3.3 third parties and affiliates who deal with or interact with us or you.
- 6.3.4 Service providers and business partners who work with us and that we may utilize to deliver certain content, products, or services or to enhance your experience.
- 6.3.5 marketing, sales generation, and recruiting business partners.
- 6.3.6 SAP, Home Affairs, Credit bureaus and other similar agencies.
- 6.3.7 government agencies, regulators and others who release or publish public records.
- 6.3.8 other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

7. HOW WE SHARE INFORMATION

We share personal information for the purposes set out in this Processing Notice and with the following categories of recipients:

- 7.1 **The Group, our employees and our affiliates.** We may share your personal information amongst our employees, affiliates and the companies within our Group for business and operational purposes.
- 7.2 **Your Organization and Contacts.** We may share your personal information with your organization and others with whom you have a relationship in order to fulfil or perform a contract or other legal obligation, including with third parties that arrange or provides you with access to our goods or services and who pay us in connection with such access. We may also share your personal information with your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s).
- 7.3 **Business Partners.** We may share your personal information with our business partners to jointly offer, provide, deliver, analyse, administer, improve, and personalize products or services or to host events and functions. We may also pass certain requests from you or your organization to these business providers.
- 7.4 **Third Party Content Providers.** We may share your personal information with our third party content providers to perform tasks on our behalf and to assist us in providing, delivering, analysing, administering, improving, and personalizing content related to our relationship with you, including financial, benefits, health and medical, and wellness benefits etc and may to this end pass certain requests from you or your organization to these providers.
- 7.5 **Third Party Service Providers and Operators.** We may share your personal information with our third party service providers to perform tasks on our behalf and which are related to our relationship with you, including financial service providers, property administration, management and facilities management service providers, all benefits including health, medical, and wellness benefits etc and to assist us in offering, providing, delivering, analysing, administering, improving, and personalizing such services or products.
- 7.6 **Cyber Third-Party Service Providers** -We may share your personal information with our third party cyber service providers to perform tasks on our behalf and which are related to our relationship with you, including those who provide technical and/or customer support on our behalf, who provide application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behaviour, and other products or services. These third-party service providers may also collect personal information about or from you in performing their services and/or functions on our Services. We may also pass certain requests from you or your organization to these third-party service providers.
- 7.7 **Advertisers.** We may share your personal information with advertisers, advertising exchanges, and marketing agencies that we engage for advertising services, to deliver advertising, and to assist us in advertising our brand and products and services. Those advertising services may also target advertisements on third party websites based on cookies or other information indicating previous interaction with us and/or ourselves.
- 7.8 **Users.** We may aggregate information from public records, phone books, social networks, marketing surveys, business websites, and other sources made available to us to create listings and profiles that are placed into user listings and directories. Additionally, if you choose to include your personal information in any reviews, comments, or other posts that you create, then that personal information may be displayed other users as part of your posting.

- 7.9 **In the Event of Merger, Sale, or Change of Control.** We may transfer this privacy statement and your personal information to a third-party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).
- 7.10 **Regulators and law enforcement agencies.** We may disclose your personal information to regulators and other bodies to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request.
- 7.11 **Other Disclosures.** We may disclose your personal information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the group, our employees, any users, or the public.

8. HOW WE SECURE YOUR INFORMATION

- 8.1 The security of your Personal Information is important to us. Considering the nature, scope, context, and purposes of processing personal information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of personal information in accordance with applicable data protection laws. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.
- 8.2 Your Personal Information will be stored electronically which information, for operational reasons, will be accessible to persons employed or contracted by us on a need-to-know basis, save that where appropriate, some of your Personal Information may be retained in hard copy.
- 8.3 Once your Personal Information is no longer required due to the fact that the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with the applicable Group entity's records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the purposes described in this privacy statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.
- 8.4 Please note that notwithstanding the contents of this clause, no method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

9. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

- 9.1 We may from time to time have to disclose your Personal Information to other parties, including our holding company or subsidiaries, trading partners, agents, auditors, organs of state, regulatory bodies and / or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions in accordance with applicable data protection laws.
- 9.2 Where your Personal Information is transferred to a party who is in a country which is situated outside South Africa, your Personal Information will only be transferred to such a party who is subject to a law or binding agreement which provide an adequate level of protection that effectively upholds the principles for reasonable Processing Information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and where applicable, a juristic person, and includes provision that are substantially similar in relating to the further transfer of the Personal Information from the recipient to third parties who are in a foreign country
- 9.3 However, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect personal information, we cannot guarantee its absolute security.

10. YOUR RIGHTS

You as a Data Subject have certain rights, which are detailed below:

- 10.1 **The right of access-** You may ask us free of charge to confirm that we hold your personal information, or ask us to provide you with details, at a fee, how we have processed your personal information, which can be done by following the process set out under our PAIA Manual.
- 10.2 **The right to rectification or deletion:** You have the right to ask us to update or rectify any inaccurate, irrelevant, excessive, out of date, incomplete, misleading Personal Information or Personal Information obtained unlawfully, and where any overriding legal basis or legitimate reason to process your Personal Information no longer exists, and the legal retention period has expired, you may request that we delete the personal information.
- 10.3 **The right to object to and restrict further processing-** you have the right to object to Processing, at any time, if the Processing protects your legitimate interest or is necessary for pursuing the legitimate interest of the Responsible Party or of a third party to whom the information is supplied, and where we do not need your consent to Process your Personal Information, but you are not in agreement with such processing, you can object to us processing such Personal Information.
- 10.4 **The right to withdraw consent** or to opt out of promotional or marketing communications- where you have provided us with consent to process your personal information, you have to right to subsequently withdraw your consent.
- PAIA Manual and forms:**
<https://academybrushware.co.za/terms-and-conditions/>

11. CHANGES TO THIS PROCESSING NOTICE

As our Group changes over time, this Processing Notice is expected to change as well. We reserve the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on Website and in this regard encourage you to visit our Website frequently in order to keep abreast with any changes.

12. CONTACT US

- 12.3 Any comments, questions or suggestions about this Internal Processing Notice or our handling of your Personal Information should be emailed to popi@academybrush.co.za
- 12.4 NOTE: Any comments/questions/complaints received may be re-directed to the appointed Information Officer of the specific Group entity or subsidiary to which the matter relates.

Information Officer	Craig Smith	P.O. Box, Germiston, 1400	011 821 2900
Deputy Information Officer	Jon Long	P.O. Box, Germiston, 1400	011 821 2900

- 12.6 Our switchboard is open 8:00 am – 4:30 pm GMT, Monday to Thursday and 8:00 am – 3:00 pm GMT on Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible.

13. PROCESSING PERSONAL INFORMATION OF ANOTHER

- 13.1 If you process another's Personal Information on our behalf, or which we provide to you in order to perform your contractual or legal obligations or to protect any legitimate interest, you will keep such information confidential and will not, unless authorised to do so, process, publish, make accessible, or use in any other way such Personal Information unless in the course and scope of your services, and only for the purpose for which the information has been received and granted to you.

14.2 All complaints will be treated in a confidential manner.

14.3 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to submit your complaint to the South African, Information Regulator who can be contacted at:

Postal address:	JD House 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Telephone number:	+27 (0) 10 023 5200
Email address:	enquiries@inforegulator.org.za
Website:	www.inforegulator.org.za.

15. ACCEPTANCE

By providing us with the Personal Information which we require from you as listed under this Processing Notice:

- 15.1 You acknowledge that you understand why your Personal Information needs to be processed;
- 15.2 You accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
- 15.3 AMEND AS Otherwhere consent is required for any processing as reflected in this Processing notice, you agree, by way of providing us with your Personal Information, that we may process this particular Personal Information.
- 15.4 You confirm that you have shared this Processing Notice with your employees, contractors and subcontractors and have received from them the required consent to provide us with their respective Personal Information for processing as provided for and described under this Processing Notice, and where consent is required for any processing as reflected in this Processing notice, such persons have agreed that we may process their particular personal information.
- 15.5 The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to each of the parties' successors in title and or assigns where applicable.
- 15.6 Furthermore, should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and / or the required permissions in respect of the processing of that organization or entities' Personal Information.

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