

initiativeTM

Privacy Policy

1. Purpose

- a. Provide protection of personal data collected
- b. This policy is a statement that explains in simple language how an organisation or agency handles personal information that can be associated with a specific natural or juristic person and can be used to identify that person (“personal information”)

2. Scope

Initiative employees

All Data subjects of Initiative Promotions and Design (PTY) LTD

Clients whom we offer products and/or services to, including quotations

Suppliers whom we utilise for products and/or services to, including quotations

3. Requirements

- a. Privacy Policy Statement

4. Policy & Procedure

4.1. DEFINITIONS

4.1.1. Your Personal Information is defined by the Protection of Personal Information Act (the Act) as: “means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number,

location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person”

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

4.1.3. Personal Information includes;

4.1.3.1. certain information collected to engage in business (including quotations) as well as

4.1.3.2. optional information that you provide to us voluntarily

4.1.4. Company information

4.1.4.1. Includes personal information as well as other information, for example

Company / CC / business name (if applicable)

Company / CC / business registration number / VAT Registration Number (if applicable)

Company Addresses (Physical and Postal)

Company Contact Information (telephone, email, fax, etc)

Bank account details and confirmation letter (if applicable)

Contact person Full Name

Contact person Identity Number (if applicable)

Contact person Contact Number (if applicable)

We will not collect, use or disclose sensitive information (such as information about racial or ethnic origins or political or religious beliefs, where relevant) except with your specific consent or in the circumstances permitted by law

4.1.5. Optional information

4.1.5.1. This includes artwork, images, content or products that you decide to email, upload or electronically deliver in order to facilitate your request for a quotation or order goods/ services from us

4.2. **POLICY**

4.2.1. Collection on quotation or order/services request

4.2.1.1. When you request a quotation or order goods/ services from us, you will be asked to provide us with information on a voluntary basis (“company information”) to load onto our Workbook System and SAGE Accounting System.

4.2.1.2. Similarly when we request a quotation or order goods/ services from a supplier, you will be asked to provide us with information on a voluntary basis (“company information”) to load onto our Workbook System and SAGE Accounting System.

4.2.1.3. You may also provide additional information to us on a voluntary basis (“optional information”).

4.2.2. Consent to collection

4.2.2.1. We will obtain your consent to collect personal information:

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

4.2.3. In line with the 8 Conditions in the Protection of Personal Information Act, 4 of 2013 (the Act),

4.2.3.1. We;

- Accept joint responsibility and accountability with you to responsibly manage and protect your Personal and Company Information when providing our services and solutions to you;
- Undertake to receive, only from you, and process the Personal and Company Information that is necessary for the purpose to assist you with your required solutions, conclude the necessarily related agreements and consider the legitimate legal interests of everyone

concerned, as required by the Act and to respect your right to withdraw your consent for the processing of your Personal and Company Information;

- Undertake to only use your Personal and Company Information for the purpose required to assist you or provide solutions to you;
- Undertake not to share or further process your Personal and Company Information with anyone if not required for assisting you with your solutions or by the law;
- Undertake to be open and transparent and notify you as and when required by law regarding why and how your Personal and Company Information needs to be collected; •
- Undertake to safeguard and protect your Personal and Company Information in our possession;
- Undertake to freely confirm what Personal and Company Information we have, to update and correct the Personal and Company Information, and to keep it for no longer than legally required.

4.2.3.2. We or the companies who provide or assist us with the solutions required, need to collect, use, and keep your Personal and Company Information as prescribed by relevant laws and regulations and for reasons such as:

- Providing you with advice, products or services that suit your needs as requested, and to maintain our relationship;
- To respond to your queries;
- To verify your identity and to conduct credit reference searches;
- To issue, administer and manage your orders and procurement processes;
- To process information required for doing campaigns, artwork, processing orders and planning deliveries as well as processing documentation for processing of artwork and goods on your behalf;
- To notify you of new products and developments that might be of interest to you;
- To conduct credit reference searches or verification, only if you authorise this or if it's a requirement to provide your solutions to you;
- To receive/ make payment from/ to you for goods supplied or services rendered;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For operational purposes required to assist you with the solutions you require;
- To confirm, verify and update your details;
- For audit and record-keeping purposes;
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

4.2.4. We may need to share your Personal and Company Information and/or utilise software or online platforms to enter and process your information for an application, requests, or business management purposes. This will only be done in strict adherence to the requirements of the Act.

4.2.5. Cookies;

4.2.5.1. We, as the company providing the solutions to you, may use “cookies” on our website. They enable us to improve your future visits to our site as well as provide you with a more user-friendly experience.

4.2.6. Retention of personal information

4.2.6.1. 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.

4.2.7. Enquiries

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