

---

## PHARMACO DISTRIBUTION (PTY) LTD

### PRIVACY POLICY

---

#### 1. INTRODUCTION

- 1.1 This Privacy Policy (hereinafter referred to as the "Policy") applies to the use of the website of Pharmaco Distribution (Pty) Ltd (hereinafter referred to as "Pharmaco/we/us"), Pharmaco's Novassist App and/or NeuroAid™ Platform and any interactions between you and us.
- 1.2 We gather, store, and use personal information only in line with the contents of this Policy and with applicable data protection provisions, such as the Protection of Personal Information Act 4 of 2013 (POPI).
- 1.3 We are committed to safeguarding your personal information and we take the protection of privacy and personal information very seriously. We treat your personal information as confidential and in accordance with the applicable statutory data protection provisions.
- 1.4 This Policy hereby notifies the data subject that Pharmaco, in terms of this Policy, collects personal information, as per section 18 of POPI.

#### 2. SCOPE

This Policy applies to all data subjects (i.e. persons (whether a natural or juristic) to whom the personal information relates), and the personal information we collect and process, whether it was provided to us through the use of our website, Novassist App and/or NeuroAid™ Platform, or through any other form of communications with us, such as email, telephone, or otherwise.

#### 3. COMPANY INTRODUCTION

- 3.1 We are a private pharmaceutical company duly incorporated in accordance with the laws of the Republic of South Africa, registered under registration number

1998/010783/07, with our registered office situated at 3 Sandown Valley Crescent, South Tower, 1st Floor, Sandton, 2196.

3.2 Our Information officer is available for questions related to handling of personal information and may be contacted using the details provided below:

3.2.1 Information Officer: Mr. Roberto Agustoni.

3.2.2 Postal Address: P.O. Box 786522, Sandton 2146.

3.2.3 Street Address: 3 Sandown Valley Crescent, South Tower, 1st Floor, Sandton, 2196.

3.2.4 Telephone Number: 011 784 0077.

3.2.5 Fax Number: 011 784 6994

3.2.6 Email Address: [privacy@pharmaco.co.za](mailto:privacy@pharmaco.co.za).

#### 4. **PERSONAL INFORMATION WE COLLECT**

Personal information is any information that may identify or relate to any identifiable person (be it natural or juristic). The personal information we collect may include, but is not limited to:

4.1 Identity information – such as your name, identification number, company registration number or VAT registration number, including the names of any employees or representatives;

4.2 Contact information – such as your address, zip/postal code, email address and phone number, including the contact information of any employees or representatives;

4.3 Financial and payment information – such as your spending and transaction history, or bank account information;

4.4 Health information – where disclosed pursuant to our Pharmacovigilance obligations;

4.5 Technical information – such as information about the device you use to interact with us on our website; and

- 4.6 Correspondence information – when you contact us, such as to send an enquiry or make a request, any correspondence or application may be kept and added to your personal information.

## 5. **PURPOSES OF COLLECTION**

For each of the categories of information listed above, we may use your personal information for the following purposes: -

- 5.1 to enable you to use our website and Apps;
- 5.2 to allow us to identify you and any account you hold with us;
- 5.3 to provide you with customer service;
- 5.4 for billing and payment purposes in relation to the sale of purchase of any products;
- 5.5 to confirm prior transactions and/or manage or reconcile financial records;
- 5.6 to contact you in relation to any inquiries you have and deal with any other correspondence, concerns, or complaints you may have raised;
- 5.7 To send you newsletters or marketing communications about offers or other information that may be of interest to you;
- 5.8 To operate our business, including for internal purposes, such as auditing, information analysis, statistical and research purposes and to help us improve our offerings and service delivery.

## 6. **LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

- 6.1 We collect, process, and use your personal information only to the extent necessary to establish, maintain or modify legal relationships with us.
- 6.2 Where we obtain consent to process your personal information, section 11(1)(a) of POPI, serves as the legal basis for processing.
- 6.3 Insofar as your personal information is processed because processing is required to fulfil a contract, or to take the steps necessary to conclude a contract, section 11(1)(b) of POPI serves as the legal basis for processing.

6.4 Insofar as we process your personal information to fulfil a legal obligation, section 11(1)(c) serves as the legal basis for processing.

6.5 Where processing is necessary for pursuing our legitimate interests, or those of a third party to whom the information is supplied, section 11(1)(f) serves as the legal basis for processing.

6.6 In this policy, we will always indicate the basis upon which we process your personal information.

## 7. SOURCES OF COLLECTION

7.1 For the categories of information listed above, we only collect information when you provide it to us, or whether someone has provided it to us on your behalf (such as through adverse event reporting), for instance: -

7.1.1 When you purchase our products;

7.1.2 When you enter into a legal relationship with us;

7.1.3 When you contact us for any reason; or

7.1.4 When you make use of our website and/or apps.

7.2 We may also collect information from our business partners, or other publicly available sources and will combine same with the information you may have already provided to us.

## 8. WEBSITE USE

We collect personal information when you visit our website and provide specific details in relation to these aspects in the corresponding sections of this Policy below.

### 8.1 SERVER LOG FILES

8.1.1 We automatically collect and store information in so-called server log files, which your server automatically transmits to us. The information collected includes, but is not limited to:

8.1.1.1 Browser type and browser version;

- 8.1.1.2 Operating system used;
- 8.1.1.3 The internet service provider;
- 8.1.1.4 The date and time on which our website was accessed; and
- 8.1.1.5 IP address; and
- 8.1.1.6 Websites which are accessed by the data subject through our website.
- 8.1.2 We collect and temporarily store your IP Address, to enable us to transmit the contents of our website to your device, which includes, but is not limited to text, images, and files. In order for these actions to occur, the data subject's IP Address must be stored by us for the entire duration of your session on our website.
- 8.1.3 Our use of server log files ensures that our website is functional, operates optimally and maintains the security of our information technology systems.
- 8.1.4 The supply of such information is mandatory in order to ensure that we can make the content of our website available and a failure to provide such information means that you will be unable to use our website.
- 8.1.5 The legal basis for processing is our legitimate interests in the proper and user-friendly functioning of its website in terms of section 11(1)(f) of POPI.
- 8.1.6 The information collected by us through server log files is not used for marketing purposes.
- 8.1.7 The information collected through server log files will be deleted as soon as possible once the purpose for its collection has been fulfilled. As a general rule, the information collected in server log files is deleted following the expiry of a period of 7 (Seven) days. Where information is stored for a longer period, we ensure that your IP Address is deleted or altered to ensure that you can no longer be identified from such information.
- 8.2 **Contact Us Form**
  - 8.2.1 Should a data subject send us an inquiry using the contact form on our website, we may collect the following personal information from the data subject: -

- 8.2.1.1 Name and surname;
- 8.2.1.2 Telephone number;
- 8.2.1.3 Email address; and
- 8.2.1.4 The content of your request.
- 8.2.2 The contact information the data subject provides therein, will be processed by us for the sole purpose of responding to your inquiry and any follow-up questions you may have in response to us.
- 8.2.3 It is mandatory to supply certain information to allow us to respond to your request, whereas the supply of additional information is voluntary. Data subjects will recognise the mandatory information which must be supplied by an asterisk “\*” which appears in the relevant field.
- 8.2.4 The information contained in the contact form is processed based on: -
  - 8.2.4.1 your consent in terms of section 11(1)(a) of POPI, which consent may be revoked at any time;
  - 8.2.4.2 section 11(1)(b) of POPI, to the extent that such contact with us is aimed at concluding or entering into a contract; and
  - 8.2.4.3 our legitimate interest in responding to your inquiry in accordance with section 11(1)(f) of POPI.
- 8.2.5 We will not share the personal information provided by you to any third parties.
- 8.2.6 We will process the information provided by the data subject on the contact form until such time as the data subject requests its deletion, revokes its consent or where it may be inferred from the circumstances that the request has been resolved, whereafter the personal information will be deleted.
- 8.3 **Google Maps**
  - 8.3.1 Our website uses the Google Maps software provided by Google Inc. By using our website, you consent to the collection, processing and use by Google and its

agents of any automated data collected. Google Maps' Terms of Use may be located here: [https://maps.google.com/help/terms\\_maps.html](https://maps.google.com/help/terms_maps.html)

8.3.2 Further information on the purpose and extent of the data collection and its processing by Google can be found on this information page. <https://policies.google.com/privacy?hl=en>

#### 8.4 **Use of Cookies**

8.4.1 We use cookies and cookies for analysis purposes on our website. Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser.

8.4.2 They are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). Generally, they ensure a consistent and efficient experience for visitors to our website and perform essential functions, such as allowing you to remain logged in to our website, amongst other things.

8.4.3 Some cookies are necessary for technical reasons; some enable a personalized experience for both visitors and registered users; and some allow the display of advertising from selected third party networks. Some of these cookies may be set when a page is loaded, or when a visitor takes a particular action (clicking the 'like' or 'follow' button on a post, for example).

8.4.4 Through our use of cookies we collect, store and transmit the following information: -

8.4.4.1 Information to recognise your browser or device on each occasion you visit our website;

8.4.4.2 Your user settings, such as audio and display settings; and/or

8.4.4.3 Information regarding your how you interact, and behave, on our website so that we may improve the quality of our website and its contents.

8.4.5 We use cookies for a number of different purposes and the different categories of cookies on our website are outlined below.

- 8.4.5.1 Strictly Necessary: These are the cookies that are essential to perform basic functions on our website. These include those required to allow registered users to authenticate and perform account related functions.
- 8.4.5.2 Functionality: These cookies are used to store preferences set by users such as account name, language, and location.
- 8.4.5.3 Performance: Performance cookies collect information on how users interact with our website, including what pages are visited most, as well as other analytical data. These details are only used to improve how the website functions.
- 8.4.5.4 Tracking: These are set by trusted third party networks (e.g. Google Analytics) to track details such as the number of unique visitors, and pageviews to help improve the user experience.
- 8.4.5.5 Third Party/Embedded Content: WordPress.org makes use of different third-party applications and services to enhance the experience of website visitors. These include social media platforms such as Facebook and Twitter (through the use of sharing buttons), or embedded content from YouTube and Vimeo. As a result, cookies may be set by these third parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.
- 8.4.6 Cookies are stored on your device and transmitted to us. As such, you have full control over our use of such cookies and the supply of such information is entirely voluntary.
- 8.4.7 You are able to alter your cookie setting in your internet browsers and can disable or restrict the transmission of cookies. Saved cookies are can also be deleted at any time.
- 8.4.8 However, you may only have access to a restricted version of our website, or not at all, if you reject the storage of cookies or delete the necessary cookies.
- 8.4.9 The information collected through this cookie is stored on your browser until such time as you clear and/or delete your stored cookies. This information is stored on the individual's browser and will remain private until the indivual



deletes this information. The website will not be able to take this information and identify an individual.

8.4.10 The legal basis for processing is: -

8.4.10.1 Based on your consent in terms of Section 11(1)(a) of POPI; and/or

8.4.10.2 our legitimate interests in the proper and user-friendly functioning of our website in terms of section 11(1)(f) of POPI.

8.4.11 We do not share the information we collect via cookies to any other person.

## 8.5 **Google Analytics**

8.5.1 Our website uses the "Google Analytics" service provided by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse your usage of our website. The service uses "cookies" - text files stored on your device. The information collected by the cookies is usually sent to a Google server in the US and stored there.

8.5.2 The personal information collected through the use of Google Analytics is anonymised to ensure that you cannot be identified by such information. Under the terms of the agreement which website operators have entered into with Google Inc., they use the information collected to compile an evaluation of website activity and site activity and provide Internet-related services.

8.5.3 You are able to prevent the storage of cookies on your devices by selecting the appropriate settings on your browser. There is no guarantee that you will be able to access all features of this website without restriction if their browser does not allow cookies.

8.5.4 Furthermore, you can use a browser plug-in to prevent the information collected by cookies (including your IP address) from being sent to Google Inc. and used by Google Inc. The following link leads you to the corresponding plugin:  
<https://tools.google.com/dlpage/gaoptout?hl=en>

8.5.5 You can prevent the collection by Google Analytics by clicking on the following link. An opt-out cookie will be set which prevents the future collection of your data when visiting our website:

8.5.6 Deactivate Google Analytics

8.5.7 Here's more information on Google Inc's data usage:  
<https://support.google.com/analytics/answer/6004245?hl=en>

8.6 **Links to Other Websites**

Our website contains links to other websites, with relevant hyperlinks for these purposes being labelled as such. We have no influence on, or to what extent, the linked websites comply with POPI and accordingly recommends that you acquaint yourself with the relevant privacy policies for such other websites before accessing or entering same.

8.7 **Website Security**

8.7.1 Our website uses Secure Socket Layer (SSL) encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us.

8.7.2 You can recognize an encrypted connection in their browser's address bar when it changes from "http://" to "https://" and the system-specific lock icon is displayed in your browser's address bar.

8.7.3 If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

9. **EMAIL AND TELEPHONE CONTACT WITH PHARMACO**

9.1 Where you contact us for any reason, be it via email or telephone we may collect the following information: -

9.1.1.1 Name and surname;

9.1.1.2 Company;

9.1.1.3 Email address; and/or

9.1.1.4 Telephone number.

- 9.1.2 The contact information you provide, will be processed by us for the purpose of responding to your inquiry and any follow-up questions which may arise by virtue of our response.
- 9.1.3 It is mandatory to supply the information which is necessary to allow us to respond to your request, whereas the supply of additional information is voluntary. A failure to provide the mandatory information means that we are unable to respond to your request.
- 9.1.4 The information collected from you during a telephone call or upon receipt of an email is processed based on: -
- 9.1.4.1 Your consent in terms of section 11(1)(a) of POPI, which consent may be revoked at any time.
- 9.1.4.2 Section 11(1)(b) of POPI, to the extent that your contact with us is aimed at concluding or entering into a contract or performing in terms thereof.
- 9.1.4.3 Our legitimate interest in responding to your inquiry in accordance with section 11(1)(f) of POPI.
- 9.1.5 We will not share the information provided by you to any third parties unless we require a third-party service provider to assist in responding to the request.
- 9.1.6 We will process the information provided by you during the telephone call or in the email until such time as you request its deletion, revoke your consent or where it may be inferred from the circumstances that your request has been resolved, whereafter the personal information will be deleted.

## 10. PHARMACOVIGILANCE

- 10.1 From time to time, we may collect personal information when we are notified of any side effects, or any other issues regarding the safety and/or quality of our products.
- 10.2 The Pharmaco website is generally not the correct forum to submit these notifications, and we request that you contact your local health care professional or health authority to assist you with reporting these issues.

10.3 However, should you notify us of any of these issues, we are under a legal obligation to manage your notification and may collect personal information from you in order to do so, which may include notifying health care authorities.

10.4 Our redacted notifications may also be made available to companies forming part of our group and our third-party business partners to the extent that they may be required to notify health authorities in their respective jurisdictions.

10.5 Further information regarding notification in respect of these issues may be found in our Pharmacovigilance Privacy Notification, which is accessible [here](#).

## 11. **MARKETING ACTIVITIES**

11.1 Marketing is an important way in which we conduct business and is key to its continued success. We ensure our marketing activities are conducted strictly in accordance with POPI.

11.2 We will only direct market to you via electronic communication if you are an existing customer, or in circumstances where you have provided your consent to receive such marketing materials.

11.3 In order to enable such direct marketing activities, we will collect personal information from you such as your name and email address, this information is collected from you either at the time your purchased products from us, or at the time your provided us with your information.

11.4 We process the personal information of data subjects who have provided their consent, or who are customers of ours for the purpose of informing them of products and services, promotions, and other opportunities.

11.5 We process this personal information based on: -

11.5.1 your consent in terms of section 11(1)(a) of POPI; or

11.5.2 actions which are necessary for the performance of a contract to which you are party in terms of section 11(1)(b) of POPI; and

11.5.3 Our legitimate interest in informing you of products and services, promotions, and other opportunities in accordance with section 11(1)(f) of POPI.

- 11.6 The supply of such personal information for the purposes of direct marketing is entirely voluntary and a failure to provide such information would mean that we are unable to keep data subjects informed of products, services, and opportunities, which may be of interest to you.
- 11.7 In order to conduct our marketing activities, we may transfer your personal information to service providers. However, we include contractual provisions which ensure that your information is always protected in compliance with POPI.
- 11.8 At all times, you have the right to object to the processing of your personal information for the purposes of direct marketing. To exercise this right, you can simply opt out of receiving further electronic communications by clicking the unsubscribe button at the bottom of every marketing email we send, or by emailing us directly.
- 11.9 We may also process your personal information to direct market in other ways, which do not involve electronic communications. In such cases, you are also entitled to object to the processing of your personal information in terms of section 11(3)(b) of POPI. Please visit the corresponding section below to find out more information on how to exercise this right.
- 11.10 If you have objected to the processing of your personal information for the purposes of direct marketing, either in terms of electronic communication or otherwise, we will remove you from our marketing data base and will ensure that we no longer process your personal information for these purposes. However, the legality of the processing which took place prior to such objection will not be affected.

## 12. **THIRD PARTY SERVICE PROVIDERS**

In certain cases, we make use of third-party service providers to assist us in performing our functions and duties. Where we transfer personal information to our third-party service providers, we commit them to safeguarding the security of the personal information which is provided to them in terms of written contracts, which oblige them to treat such information as confidential and not disclose it, and to adopt appropriate security measures to protect the relevant personal information from unauthorised access. The processing of personal information in such cases is performed: -

- 12.1 Where necessary to conclude and/or perform in terms of a written contract to which the data subject is party in terms of section 11(1)(b) of POPI;
- 12.2 Where it complies with an obligation which is imposed in terms of law in terms of section 11(1)(c) of POPI;
- 12.3 To protect the legitimate interests of the data subject in terms of section 11(1)(d) of POPI; or
- 12.4 In pursuit of our legitimate interests to render services which are of a high quality in accordance with section 11(1)(f) of POPI.

### 13. **TRANSFER OF PERSONAL INFORMATION OUTSIDE OF THE REPUBLIC OF SOUTH AFRICA**

13.1 Save as specified in this Policy and/or our Manual prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, we will not transfer your personal information outside of the Republic of South Africa. In cases where personal information is transferred to third parties based outside of the Republic of South Africa, we will only transfer such information: -

13.1.1 in terms of a written contract which: -

13.1.1.1 Effectively upholds the principles of reasonable processing as set out in POPI; and

13.1.1.2 Limit the further transfer of such personal information in terms of provisions which are substantially similar to the provisions of section 72 of POPI.

13.1.2 With your explicit consent to such transfer; or

13.1.3 Where such transfer may be authorised in accordance with POPI.

13.2 In all cases, we will ensure that your personal information remains safe and secure.

### 14. **PROMOTION OF ACCESS TO INFORMATION**

14.1 Should you wish to access any information held by us for the purposes of exercising any of their rights, please refer to our manual, which has been prepared in accordance with

section 51 of the Promotion of Access to Information 2 of 2000, as amended, which manual is accessible on our website or may be obtained upon request.

14.2 Although you have the right to request access to information held by us, in certain instances we are obliged to refuse access to information based on the grounds contained in the provisions of Chapter 4 of Part 2 and Chapter 4 of Part 3 of the Promotion of Access to Information Act 2 of 2000, as amended.

14.3 In the event that a particular ground of refusal applies, we will not provide you access to such information.

## 15. SECURITY IN RESPECT OF PERSONAL INFORMATION

15.1 All information stored by **PHARMACO**, is stored in compliance with POPI and on specially secured servers.

15.2 The storage thereof is a technical and organizational measure employed by us to protect against loss, destruction, access, alteration, or dissemination of your data by unauthorized persons.

15.3 Only authorized persons are able to access the personal information of data subjects. These individuals are responsible for the technical, commercial, and editorial supervision of the server. Despite regular inspections, complete protection against all risks is not possible and we in no way guarantees complete protection in this regard.

15.4 For more information in respect of our security practices, please refer to our Manual which has been prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, which Manual is available on our website.

## 16. SECURITY COMPROMISES

16.1 We have established and maintain appropriate security measures to ensure that your personal information is protected (such as firewalls, password access and encryption methods). However, complete protection is not possible and we in no way guarantee complete protection against all risks.

16.2 Should we have reason to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify you and the Information Regulator of the security compromise within a reasonable time of becoming aware of such

occurrence, unless your identity cannot be established. The basis for processing a data subject's information in such cases is to comply with obligations imposed by law, in terms of section 11(1)(c) of POPI and to protect your legitimate interest in respect of their personal information in terms of section 11(1)(d) of POPI.

## **17. RETENTION OF PERSONAL INFORMATION**

17.1 We will only store your information in accordance with this Policy and as may otherwise be required in terms of the statutory retention periods prescribed in terms of the laws of the Republic of South Africa, whereafter the personal information will be deleted and/or destroyed in such a manner that it cannot be reconstructed in an intelligible format.

17.2 In the event that we retain information for longer than the period prescribed by law, be it for statistical, historical or research purposes, we will ensure that personal information is deidentified or anonymised, to ensure that your privacy is maintained.

## **18. YOUR RIGHTS IN RESPECT OF PERSONAL INFORMATION**

18.1 We place strong emphasis on explaining the processing of your personal information as transparently as possible and informing you of your rights. In the event that you would like more detailed information or wish to exercise your rights, you can contact us at any time so that we can take care of your concerns.

18.2 In terms of POPI, you have the following rights in respect of your personal information:

18.2.1 you may inquire, at no cost, whether we hold your personal information;

18.2.2 where necessary, you may request the correction, destruction, or deletion of your personal information;

18.2.3 object to or request the restriction or limitation of the processing of your personal information;

18.2.4 object to us utilising personal information for purposes of direct marketing;  
and/or

18.2.5 request that your personal information not be used to send unsolicited electronic communications.



18.3 In the paragraphs below, we provide more detailed information on how to exercise your rights.

#### 18.4 **Right of Access to, Correction and/or Deletion of Personal Information**

18.4.1 Provided you are able to prove your identity, you have the right to request confirmation, free of charge, whether we hold personal information about you, as well as information about the categories of third parties who have, or have had, access to your personal information.

18.4.2 Should you wish to establish whether we hold any personal information about you, you are invited to send us an email with your request using the information set forth above.

18.4.3 Should personal information be disclosed to the data subject in response to any requests as aforesaid, the data subject is hereby notified of its right to request correction, deletion and/or blocking of the personal information, in line with section 24 of the Protection of Personal Information Act 4 of 2013, as amended.

18.4.4 Should you wish to request the correction or deletion of your personal information or the destruction or deletion of a record of personal information, please submit a request to us on Form 2, which may be accessed at <https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>. We will render such reasonable assistance, as may be necessary and free of charge, to enable you to complete Form 2.

#### 18.5 **Withdrawal of Consent and Right to Object to processing of Personal Information**

18.5.1 You have the right to revoke your consent to any processing of your personal information and may exercise your right by simply sending us an email. However, the revocation of such consent will not affect the lawfulness of continued processing where legal grounds authorise or require us to continue processing such information, nor will it affect the lawfulness of any processing that was carried out by us between the time of consent and withdrawal.

18.5.2 Please take note that you may also object, in terms of section 11(3)(a) of POPI, to the processing of your personal information, where processing takes place on the following grounds: -

- 18.5.2.1 In order to protect your legitimate interest; or
- 18.5.2.2 Where processing is necessary for pursuing our legitimate interest, or those of a third party.
- 18.5.3 Should you wish to object to the processing of your personal information in terms of section 11(3)(a) of POPI, please submit your objection to us on Form 1, in accordance with the Regulations relating to POPI.
- 18.5.4 The Form 1 document may be accessed through the following link:  
<https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>
- 18.5.5 We will render such reasonable assistance as is necessary, free of charge, to enable you to make an objection on Form 1.
- 18.5.6 Any objections must be based on reasonable grounds relating to your particular situation unless legislation provides for such processing, in which case we shall continue to process such personal information in compliance with our statutory obligations.
- 18.5.7 In the absence of such legislative obligations, we will review and, if necessary, cease the processing of such personal information.
- 18.5.8 We will inform you of the results of the review and if the data processing is to continue nevertheless, we will provide you with detailed information about why the continued processing is permitted and/or required.
- 18.6 **Right to Lodge a Complaint**
- 18.6.1 Should you feel as though we have used your personal information contrary to POPI, please send us an email in order for us to attempt to address any of your concerns. If we are unable to resolve the issue to your satisfaction, you have the right to lodge a complaint with the Information Regulator.
- 18.6.2 In terms of the Regulations relating to POPI, any person who wishes to submit a complaint must submit such a complaint to the Information Regulator on Part I of Form 5.

18.6.3 The relevant form is accessible via the following link:

<https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>

18.6.4 The available contact details of the Information Regulator are recorded as follows:

18.6.4.1 Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001;

18.6.4.2 Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017.

18.6.4.3 Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za).

## 19. **UPDATES TO THIS POLICY**

We reserve our right to amend this Policy from time to time and will do so without notice to you. The latest version of this Policy will be indicated by the date information (below). The current version of this Policy can always be accessed directly via our website.

**Last updated: 10 December 2021**