

Red Dot Catering (PTY LTD) T/A The Grocery Express

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|  | Authorised by: | Chris Liebenberg Information Officer |
| | Date Authorised: | 02 July 21 |
| | Document Number: | July 21-01 |

Protection Of Personal Information Consent

("The Client")
And
**Red Dot Catering (Pty)LTD t/a
The Grocery Express**

REQUEST FOR CONSENT TO RECEIVE DIRECT MARKETING COMMUNICATION

SECTION 69(2) AND REGULATION 6 OF THE PROTECTION OF PERSONAL INFORMATION ACT

FORM 4 – PART A

Dear Client

We do direct marketing via electronic communication for example sms email etc. We also share personal information with third parties in order to optimize our service delivery. You are currently on our marketing list and only if you wish to not receive any marketing information you should click on the opt out link below.

Please Note That our website Makes use of Cookies

1. This agreement will be applicable to all personal information as defined in the Protection of Personal Information Act, 4 of 2013 ("POPI").
2. By either Party submitting any personal information to the other, the disclosing Party unconditionally and voluntarily, consents to the processing of the submitted personal information for any and all purposes related to this agreement.
3. The Parties agrees and consent that its personal information may be processed by, or on behalf of either of the Parties for the purposes set out in the Agreement.
4. The Parties shall at all times comply with its obligations and procure that each of its Affiliates comply with their obligations under POPI.
5. The Parties shall ensure that any personal information that is processed by it in the course of performing its obligations under the Agreement is done in accordance with POPI.
6. Each Party shall not process, disclose, or use personal information except:
 - a) to the extent necessary for the provision of Services and/or Products under the Agreement; or
 - b) to fulfil their own obligations under the Agreement; or
 - c) as otherwise expressly authorised by the other Party in writing.
7. Red Dot Catering t/a The Grocery Express shall disclose any personal information to any Third Party without the other Party's prior consent in each instance, and to the extent required by any Regulator or Law.

8. In the event that the disclosure of personal information to a Third Party, each Party shall:
 - a) make such disclosure in compliance with POPI; and
 - b) enter into a written agreement with the applicable Third-Party recipient of such personal information that requires such Third Party to safeguard the personal information in a manner no less restrictive than each Party's obligations under these terms.
9. The Parties shall implement and maintain an effective security safeguards that includes, but is not limited to administrative, technical, and physical safeguards, and appropriate technical and organisational measures, in each case, adequate to insure the security and confidentiality of personal information, and to protect against any anticipated risks to the security or integrity of personal information, protect against unauthorized access to or use of personal information, protect personal information against unlawful processing or processing otherwise than in accordance with this agreement, and protect against accidental loss, destruction, damage, alteration or disclosure of personal information.
10. Without limiting the foregoing, such safeguards and measures shall be appropriate to protect against the harm that may result from unauthorised or unlawful processing, use or disclosure, or accidental loss, destruction, or damage to or of Personal Information and the nature of the personal information, and shall maintain all safeguard measures as is required by POPI.
11. Each Party shall not use, process, store, transfer or permit access to any personal information across the borders of South Africa, without the written consent of the other Party.
12. In the event of any actual, suspected, or alleged security breach, including, but not limited to, loss, damage, destruction, theft, unauthorized use, access to or disclosure of any personal information, each Party shall:
 - a) notify the other Party as soon as practicable after becoming aware of such event;
 - b) provide the other Party with all information regarding the breach in the Party's knowledge and possession to allow the Party to ascertain what has occurred and which personal information has been affected.
 - c) promptly take whatever action is necessary, at each Party's own expense, to minimise the impact of such event and prevent such event from recurring.
13. The Client hereby consents to the Company sharing the personal information as provided for herein cross border. Should the Client's personal information be shared cross border, the personal information will not be subject to less protection than it enjoys in terms of South Africa's data privacy laws.

Data Protection Policy

Introduction

1. Overview

- a) Where **we** refer to "process", it means how **we** collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information. As a general rule, we will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract.
- b) **We** may combine this personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- c) If **you** use **our** other services, goods, products, and service channels **you** agree that **we** may process this personal information as explained under this Privacy Policy. Sometimes **you** may provide **us** with consent to process this personal information.
- d) The Company is a global organisation and as such this Privacy Policy will apply to the processing of personal information by any member of The Company globally. If The Company processes personal information for another party under a contract or a mandate, the other party's privacy policy will apply to the processing of such information.
- e) The Company can change this Privacy Policy from time to time if the law or **our** business practices requires such change.

- f) This policy establishes a general standard for the appropriate protection of personal information (POPI) within The Company environment. Furthermore, it provides principles regarding the rights of individuals to privacy and to reasonably safeguard their personal information.

2. Scope

All employees, contractors, consultants, temporary and other workers at The Company, including all personnel affiliated with third parties must adhere to this policy. This policy applies to information assets owned or leased by The Company, or to devices that connect to a Company network or reside at a Company site.

Policy Statement

1. What is personal information?

Personal information refers to any information that identifies **you** or specifically relates to **you**, or **your** employees stored or processed on **The Product/s**. Personal information includes, but is not limited to, the following information about **you** and / or **your** employees:

- a) Marital status
- b) National origin
- c) Age
- d) Language
- e) Birthplace
- f) Education
- g) Relevant financial history
- h) Identifying number (like an employee number, identity number or passport number)
- i) E-mail address; physical address (like residential address, work address or your physical location); telephone number
- j) Biometric information (like fingerprints, signature, or voice)
- k) Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- l) Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- m) Medical history; criminal history; employment history
- n) Personal views, preferences, and opinions
- o) Another's views or opinions about you.
- p) Full names and initials

Personal information includes special personal information, as explained below.

2. When will we process your personal information?

We will only process this personal information for lawful purposes relating to **our** business if the following applies:

- a) If **you** have consented thereto
- b) If a person legally authorised by you, the law, or a court, has consented thereto.
- c) If it is necessary to conclude or perform under a contract, we have with you
- d) If the law requires or permits it
- e) If it is required to protect or pursue your, our or a third party's legitimate interest.

3. What is special personal information?

Special personal information is personal information about the following:

- a) Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded)
- b) Ethnic origin
- c) Trade union membership
- d) Health (like where you apply for an insurance policy)
- e) Biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offense.

4. When will we process your special personal information?

We may process **your** special personal information in the following circumstances:

- a) If **you** have consented to the processing
- b) If the information is being used for any Human Resource or payroll related requirement
- c) If the processing is needed to create, use or protect a right or obligation in law.

- d) If the processing is for statistical or research purposes and all legal conditions are met
- e) If the special personal information was made public by **you**
- f) If the processing is required by law

5. When and from where we obtain personal information about you

- a) **We** collect personal information from you directly.
- b) We may collect personal information from a public record or if you have deliberately made the information public.
- c) **We** collect personal information from 3rd parties that are directly integrated with **our** software platform.
- d) **We** collect information about **you** based on **your** use of **our** products, services, or service channels.
- e) **We** collect information about **you** based on how **you** engage or interact with **us** such as via emails, letters, telephone calls and surveys.
- f) We collect personal information from completed forms i.e., contact and billing information.

If the law requires **us** to do so, we will ask for **your** consent before collecting personal information.

The third parties from whom **we** may collect **your** personal information include, but are not limited to, the following:

- a) **Our** partners, **your** employer, employees directly, any of **our** other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors, and suppliers) for any of the purposes identified in this Privacy Policy.
- b) **your** spouse, dependents, partners, employer, and other similar sources.
- c) people **you** have authorised to share **your** personal information, like a person that makes a travel booking on **your** behalf or a medical practitioner for insurance purposes.
- d) attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- e) payment processing services providers, merchants, banks, and other persons that assist with the processing of **your** payment instructions, like EFT transaction partners.
- f) insurers, brokers, other financial institutions, or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes.
- g) law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- h) regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
- i) trustees, Executors or Curators appointed by a court of law.
- j) **our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**.
- k) courts of law or tribunals.

6. Reasons we need to process your personal information.

We will process **your** personal information for the following reasons:

- a) to provide **you** with products, goods and services;
- b) to market **our** products, goods, and services to **you**.
- c) to respond to **your** enquiries and complaints.
- d) to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- e) to conduct market and behavioural research, including scoring and analysis to determine if **you** qualify for products and services or to determine **your** credit or insurance risk;
- f) to develop, test and improve products and services for **you**;
- g) for historical, statistical and research purposes, like market segmentation.
- h) to process payment instruments.
- i) to create, manufacture and print payment advice;
- j) to enable **us** to deliver goods, documents or notices to **you**;
- k) for security, identity verification and to check the accuracy of **your** personal information;

- l) to communicate with **you** and carry out **your** instructions and requests.
- m) for customer satisfaction surveys, promotional offerings.
- n) to enable you to take part in and make use of value-added products and services.
- o) to assess our lending and insurance risks; and / or
- p) for any other related purposes.

7. How we use your personal information for marketing purposes

- a) **We** will use your personal information to market our services, related products, and services to **you**.
- b) **We** may also market non-banking or non-financial products, goods, or services to you.
- c) **We** will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- d) If **you** are not **our** customer, or in any other instances where the law requires, **we** will only market to **you** by electronic communications with **your** consent.
- e) In all cases **you** can request **us** to stop sending marketing communications to **you** at any time

8. When how and with whom we share your personal information

In general, we will only share **your** personal information if any one or more of the following apply:

- a) If **you** have consented to this
- b) If it is necessary to conclude or perform under a contract, **we** have with **you**
- c) If the law requires it; and / or
- d) If it's necessary to protect or pursue **your**, our or a third party's legitimate interests.

Where required, each member of the company may share **your** personal information with the following persons. These persons have an obligation to keep **your** personal information secure and confidential.

- a) Other members of The Company, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors, and suppliers) for any of the purposes identified in this Privacy Policy.
- b) **Our** employees as required by their employment conditions.
- c) Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- d) Payment processing services providers, merchants, banks, and other persons that assist with the processing of **your** payment instructions, like 3rd party EFT service providers.
- e) Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- f) Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities, and other persons the law requires **us** to share **your** personal information with
- g) **Our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**
- h) Persons to whom **we** have ceded our rights or delegated our obligations to under agreements, like where a business is sold
- i) Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications.
- j) Trustees, Executors or Curators appointed by a court of law
- k) Participating partners in **our** customer loyalty reward programmes, where **you** purchase goods, products and service or spend loyalty rewards; and / or our joint venture and other partners with whom **we** have concluded business agreements, for **your** benefit.

9. Under what circumstances will we transfer your information to other countries?

We will only transfer **your** personal information to third parties in another country in any one or more of the following circumstances:

- a) Where **your** personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient
- b) Where the transfer is necessary to enter into or perform under a contract with **you**, or a contract with a third party that is in **your** interest.
- c) Where **you** have consented to the transfer; and / or

- d) Where it is not reasonably practical to obtain **your** consent, the transfer is in **your** interest.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing **your** personal information in the other country will agree to apply the same level of protection as available by law in **your** country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of **us** transferring **your** personal information to another country is where foreign payments take place if **you** purchase goods or services in a foreign country, or request that **we** facilitate salary payments to **your** employees in the countries.

10. Your duties and rights about the personal information we have about you

You must provide proof of identity when enforcing the rights below.

You must inform **us** when **your** personal information changes.

Please refer to our Promotion of Access to Information Act 2 of 2000 Manual ([PAIA Manual](#)) for further information on how **you** can give effect to the rights listed below.

You have the right to request access to the personal information **we** have about **you** by contacting **us**. This includes requesting:

- a) Confirmation that we hold **your** personal information.
- b) A copy or description of the record containing **your** personal information; and
- c) The identity or categories of third parties who have had access to **your** personal information.

We will attend to requests for access to personal information within a reasonable time. **You** may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. **We** will inform **you** of the fee before attending to **your** request.

Please note that the law may limit **your** right to access information.

You have the right to request **us** to correct or delete the personal information **we** have about **you** if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or **we** are no longer authorised to keep it. **You** must inform **us** of **your** request in writing. Please refer to our PAIA Manual for further information in this regard, like the process **you** should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. **We** may request documents from **you** to verify the change in personal information.

A specific agreement that **you** have entered with **us** may determine how **you** must change **your** personal information provided at the time when **you** entered into the specific agreement. Please adhere to these requirements. If the law requires **us** to keep the personal information, it will not be deleted upon **your** request. The deletion of certain personal information may lead to the termination of **your** relationship with **us**.

You may object on reasonable grounds to the processing of **your** personal information.

We will not be able to give effect to **your** objection if the processing of **your** personal information was and is permitted by law; **you** have provided consent to the processing and **our** processing done according to **your** consent or the processing is necessary to conclude or perform under a contract with **you**.

You must inform **us** of any objection in writing. Please refer to **our** PAIA Manual for further information in this regard, like the process **you** should follow to give effect to this right.

Where **you** have provided **your** consent for the processing of **your** personal information, **you** may withdraw **your** consent. If **you** withdraw **your** consent, **we** will explain the consequences to **you**. **We** may proceed to process **your** personal information even if **you** have withdrawn **your** consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on **our** systems, during this time **we** may still process **your** personal information. **You** have a right to file a complaint with **us** or any Regulator with jurisdiction about an alleged contravention of the protection of **your** personal information by us. **We** will address **your** complaint as far as possible.

11. How we secure your personal information

We will take appropriate and reasonable technical and organisational steps to protect **your** personal information according to industry best practices. **Our** security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:

- a) Keeping **our** systems secure (like monitoring access and usage)
- b) Storing **our** records securely
- c) Controlling the access to **our** buildings, systems and/or records; and
- d) Safely destroying or deleting records
- e) Ensure compliance with international security standards.

12. How long do we keep your personal information?

We will keep **your** personal information for as long as:

- a) The law requires **us** to keep it
- b) A contract between **you** and **us** requires **us** to keep it
- c) **You** have consented to **us** keeping it
- d) **We** are required to keep it to achieve the purposes listed in this Privacy Policy.
- e) **We** require it for statistical or research purposes.
- f) A code of conduct requires **us** to keep it; and / or
- g) **We** require it for our lawful business purposes.
- a. Note: **We** may keep **your** personal information even if **you** no longer have a relationship with **us**, for the historical data that may be required by **your** employer or employee.

13. Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided The Company with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, we may require Your parent's consent before We collect and use that information.

14. Our cookie policy

A cookie is a small piece of data sent from **our** websites or applications to **your** computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise **your** experience on **our** websites or applications and may improve **your** experience on the websites or applications. The cookie will also identify **your** device, like the computer or smart phone.

By using **our** websites or applications **you** agree that cookies may be forwarded from the relevant website or application to **your** computer or device. The cookie will enable **us** to know that **you** have visited the website or application before and will identify **you**. **We** may also use the cookie to prevent fraud and for analytics.

Password Policy

1. Introduction

Overview

Passwords are an important aspect of computer security. A poorly chosen password may result in unauthorized access and/or exploitation of The Company resources. All users, including contractors and vendors with access to The Company systems, are responsible for taking the appropriate steps, as outlined below, to select and secure their passwords

3. Password Protection

- a) Refrain from sending plaintext passwords over networks or email, it could compromise security. Passwords sent in plain text can be read by anyone.
- b) Passwords must not be shared with anyone. All passwords are to be treated as restricted The Company information.
- c) Passwords may be inserted into email messages, Alliance cases or other forms of electronic communication, but must be encrypted and the encryption key must be shared via a different media source. Refer to the Acceptable Encryption Policy.
- d) Do not reveal a password on questionnaires or security forms.
- e) Do not hint at the format of a password (for example, "my family name").
- f) Do not share The Company passwords with anyone, including administrative assistants, secretaries, managers, co-workers, and family members.
- g) Do not write passwords down and store them anywhere in your workspace.
- h) Do not store passwords in a file on a computer system or mobile devices (phone, tablet)
- i) Do not use the "Remember Password" feature of applications (for example, web browsers).
- j) Any user suspecting that his/her password may have been compromised must report the incident to the The Company IT department immediately and request a change of passwords on all user access accounts.
- k) Password managers can be used, users must refer to the pre-authorized software list, held by InfoSec and IT departments.

5. Password Construction Guidelines

Passphrases are not the same as passwords. A passphrase is a longer version of a password and is, therefore, more secure. A passphrase is typically composed of multiple words. Because of this, a passphrase is more secure against "dictionary attacks".

A good passphrase is relatively long and contains a combination of upper and lowercase letters, numeric and punctuation characters.

Passwords that are listed in the password blacklist will not be available for use.

The Company Passwords must meet three of the four characteristics below:

- Contain at least 6 alphanumeric characters.
- Contain both upper- and lower-case letters.
- Contain at least one number (for example, 0-9).
- Contain at least one special character (for example, \$%^&*()_+|~--=\`{}[]:;'<>?,/).