

CUSTOMER PRIVACY NOTICE

Purpose of this Privacy Notice:

As a Sole Proprietor, Woemaboeker, C.Smith T/A Pikkie Publikasie 2020 (Woemaboeker) must meet its contractual, statutory and administrative obligations. We are committed to ensuring that the personal data of our members and customers is handled in accordance with the principles set out in the Protection of Personal Information Act 4 of 2013 (“**POPIA**”).

This privacy notice tells you what to expect when Woemaboeker collects personal information about you as a customer of the organization.

Woemaboeker is the controller and Responsible Party for this information unless this notice specifically states otherwise.

This notice should be read in conjunction with our Master Privacy Policy accessible on our website. When appropriate we will provide a ‘just in time’ notice to cover any additional processing activities not mentioned in this document.

Who this Privacy Notice applies to:

It applies to all prospective and existing customers of Woemaboeker.

Key definitions

Responsible Party – means the party who determines the essential means and purpose for processing your information.

Operator – the party who processes personal information on behalf of the Responsible Party.

Data Subject – the person to whom the personal information processed relates.

CONTENT COVERED IN THIS NOTICE:

1. How do we get your information
 2. What personal information we process and why
 3. Lawful basis for processing your personal information
 4. Processing of Special Personal information
 5. How long we keep your personal information
 6. Information sharing
 7. Do we use any external processors
 8. Your rights in relation to this processing
 9. Transfers of personal information
 10. Queries and complaints
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11. Annexure A – List of external processors

12. Annexure B – Direct Marketing (Opt-in / Opt-out)

1. HOW DO WE GET YOUR INFORMATION

1.1. We get information about you from the following sources:

1.1.1 Directly from you through our interactions with you.

1.1.2 Third parties, such as banks and credit bureaus, where permitted.

2. WHAT PERSONAL INFORMATION WE PROCESS AND WHY

We process the following categories of personal information:

2.1. **Information related to your membership of our co-operative and your 30-day credit application as a customer**

We use the below information as follows:

Type of information	Purpose	Legal basis
Personal contact details of directors, members, partners or trustees - such as their names, address, contact and telephone numbers (landline and mobile) and email addresses	To contact you when we provide our services to you.	To comply with our legal obligations; and to carry out our contract with you.
Date of birth, gender and ID number, including a copy of your passport or similar photographic identification, and proof of address	To verify your identity as a representative of the applicant and to comply with the National Credit Act	To comply with our legal obligations
Business name, address, registration number, VAT number	To verify the identity of the applicant; for the delivery of services rendered on approval; for tax and invoicing purposes	To comply with our legal obligations; and to carry out our contract with you

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A failure to provide us with this mandatory information may result in us being unable to provide you with our services.

2.2. Direct marketing

When you become a customer of Woemaboeke we may send marketing materials to your contact number via your email address as permitted by POPIA, provided that:

- Your contact details were obtained in the context of the sale of our services.
- We contact you for the purpose of marketing our similar products or services.
- You may opt-out at any time and free of charge at the end of this notice or on any subsequent marketing communications.

However, we will not send you any marketing materials where you have expressly opted-out of receiving such materials at the end of this Notice.

3. **LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

In addition to the basis explained above and depending on the processing activity, we rely on the Section 11 of POPIA as the lawful basis for processing your personal information:

- 3.1. where it is necessary to carry out actions for the conclusion or performance of a contract with you;
- 3.2. so we can comply with our statutory and other legal obligations as an employer;
- 3.3. to protect your legitimate interests or those of another person;
- 3.4. to pursue our legitimate interests in a proportionate manner.

4. PROCESSING OF SPECIAL PERSONAL INFORMATION

We generally do not process your special personal information. However, where we do, we will rely on the following additional lawful basis under POPIA:

- Sec 27 - General authorization concerning special personal information;
- Sec 29 - Authorisation concerning data subject's race or ethnic origin;
- Sec 33 - Authorisation concerning data subject's criminal behaviour or biometric information.

5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION AND HOW IS IT SECURED

Coastals will only keep your personal information for as long as necessary to achieve the above stated purposes, or where a longer period is prescribed by law. Our general data retention periods are explained below:

- Customer information – we retain, for (five) years from the date of last entry or document on file, all accounting records, files, transactions and documents relating to matters dealt with by Woemaboeke on your behalf.
- Customer contact information – *contact information* may be retained while you are a member / customer, after which you become a prospective member / customer.
- Prospective customer contact information – your contact information is retained for 3 years after submitting an application for credit/membership, or until it is identified that you no longer have an interest in our services.
- Credit reports, where permitted – We retain, for 3 (three) years from the date of last entry or document on file, your credit information to record,

maintain and assess your credit-worthiness for our services as required by law.

6. **INFORMATION SHARING**

- 6.1. In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors.
- 6.2. We may also share your personal information with banks and millers strictly for purposes of verifying your identity per our legal obligations and verifying details provided concerning crop-yields and banking information.

7. **DO WE USE ANY OPERATORS (EXTERNAL PROCESSORS)?**

- 7.1. We use external processors (“**Operators**”) for certain processing activities and to assist in the performance of our legal obligations as a Company.
- 7.2. We reserve the right to change our Operators at any time without further notice to you, but we will ensure our Operators are bound by this Privacy Notice and our Data Protection Policy, or similar terms providing the same or higher level of protection. Such external processing activities include, but are not limited to:
 - 7.2.1. IT systems and infrastructure;
 - 7.2.2. Debt collection services;
 - 7.2.3. Hosting and email infrastructure;
 - 7.2.4. Credit reference agencies.
- 7.3. We conduct strict due diligence procedures in respect of our external Operators prior to forming a business relationship. We also obtain company documents and references to ensure the

Operator is adequate, appropriate and effective for the task we employ them for.

7.4. A list of our current external processors can be found at [Annex A](#).

8. **YOUR RIGHTS IN RELATION TO THIS PROCESSING**

8.1. Data protection laws may grant you with, among others, the following rights:

8.1.1. **Notification of collection or authorised access** – to be notified that your personal information is being collected, or has been accessed by an unauthorised person;

8.1.2. **Request access to your Personal Information** – enabling you to receive a copy of the Personal Information retained about you;

8.1.3. **Request the correction of your Personal Information** – to ensure any incomplete or inaccurate Personal Information is corrected;

8.1.4. **Request erasure of your Personal Information** – where there is no lawful basis for the retention or continued processing of your Personal Information;

8.1.5. **Object to the processing of your Personal Information for a legitimate interest (or those of a third party)** - under certain conditions where you feel it impacts your fundamental rights and freedoms;

8.1.6. **Request restriction of processing of your Personal Information** – to restrict or suspend the processing of your Personal Information to limited circumstances;

8.1.7. **Withdraw consent given in respect of the processing of your Personal Information at any time** – withdrawal of consent will not affect the lawfulness of any processing carried

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out before your withdrawal notice. But may not affect the continued processing of your Personal Information in instances where your consent is not required.

8.1.8. **Lodge a complaint** – to our Information Officer and the Information Regulator as the relevant supervisory authority

8.1.9. **Institute civil legal proceedings** – regarding the alleged interference with the protection of your personal information.

To not be subject to:

8.1.10. **automated processing** - and decisions solely based on such automation intended for profiling you.

8.1.11. **direct marketing** - by means of unsolicited electronic communications except where permitted under POPIA.

9. TRANSFERS OF PERSONAL DATA

We do not routinely transfer employee personal information outside of the Republic of South Africa, but when this is necessary we ensure that we have appropriate safeguards and contractual arrangements in place.

10. QUERIES, COMPLAINTS, AND INFORMATION REGULATOR

If you have any questions or complaints about your privacy rights or this Privacy Notice, please address your concerns to our Information Officer at kara@woemaboeke.com. If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the South African Information Regulator through their website, <https://www.justice.gov.za/infoereg/>.

ACKNOWLEDGMENT OF PRIVACY NOTICE

I _____ hereby acknowledge that I have read and understood the contents of this Customer Privacy Notice.

Customer signature	
Date	

ANNEXURE A – OPERATOR (EXTERNAL PROCESSORS)

External processors are third parties who provide certain parts of our staff services for us. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. Our current external processors are listed below.

We may appoint other external processors not listed in the below table where it is permitted to do so in terms of POPIA.

Item	Operator	Purpose for processing
1	NASO Accounting Services	Accounting

ANNEXURE B – CONSENT TO DIRECT MARKETING

To subscribe to marketing updates from Woemaboeker, kindly fill out the information requested below. By doing so you consent to receiving direct marketing from Woemaboeker.

You can review our Privacy Policy – which provides you with information on how we use and process your data. You can also contact us at any time if you no longer wish to receive direct marketing from Woemaboeker.

As a member you have a choice on how you would like to receive the marketing information, kindly tick the appropriate option:

Email	
SMS	
Telephone	

Name and Surname: _____

Contact Number: _____ **Email:** _____

Customer Signature