

EMAIL, WEBSITE AND SOCIAL MEDIA PRIVACY POLICY

(updated 17 – 06 – 2021)

This Privacy Policy has been adopted as part of the Personal Information Protection Compliance Framework of SOURCE et cetera (Pty) Ltd. We respect your privacy.

By interacting with SOURCE et cetera (Pty) Ltd and providing your Personal Information¹ to us, you acknowledge that you have read and understood this Policy which forms part of our PAIA Manual (compiled in terms of Section 51 of the Promotion of Access to Information Act Nr. 2 of 2000) and is supported by our Section 18 Notice (compiled in terms of the Protection of Personal Information Act Nr. 4 of 2013). You furthermore authorise us to take any of the actions described herein insofar as your Personal Information is concerned.

1. APPLICATION

The contents of this Policy is applicable to all SOURCE et cetera electronic platforms and facilities, including social media, websites and/or email, whether owned by, established by, used by, hosted by and/or accessed by SOURCE et cetera, and all and any Data Subject(s)², who may access and make use of the aforementioned SOURCE et cetera electronic platforms and facilities, including, without detracting from the generality thereof, SOURCE et cetera employees and staff, consumers and customers, vendors, contractors, service providers and other third parties.

2. INTERNET USAGE INFORMATION

When you visit our website, we automatically collect your Internet usage information (including your IP address³, browser details and usage information) through your browser⁴, which we may use to display our website correctly, track your activities on it, or for other necessary purposes.

SOURCE et cetera has placed cookies⁵ on its website which makes contact with a Data Subject's device to improve our website experience.

· Your personal information is any information that relates to you as an identifiable living human being or existing juristic person. Personal information can include your demographic information, historical information, identifying information, biometric information and personal opinion or assessments in terms of other people's opinions.

· The person whose Personal Information is being processed by or on behalf of SOURCE et cetera (Pty) Ltd. In the documents forming part of our compliance framework, Data Subjects are sometimes referred to as "you".

· A unique address that identifies a device on the Internet or a local network.

· An application used to access and view this website.

· This is a small text file created by a website that is stored in the user's computer either temporarily for that session only or permanently in the hard disk.

We will only use your Personal Information in a manner consistent with the purpose for which we collected it and agreed with you.

In addition, where necessary, your information may be retained for legal or research purposes. For example:

- To gather contact information
- To confirm and verify your identity or to verify that you are an authorised user for security purposes
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- To conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- In connection with legal proceedings

3. PROCESSING OF PERSONAL INFORMATION

We may process your Personal Information to fulfil our obligations to you. Processing means doing anything with personal information, including gathering it, disclosing it or combining it with other information.

We generally process the following types on the indicated basis according to the following table:

Purpose	Data	Basis
Enquiring about SOURCE et cetera and our product offering.	Name, email, message and phone number.	Legitimate interest - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our product offering.	Name and email.	Consent - you have given your active consent.
Collaborating with SOURCE et cetera.	Demographical information, birth dates, identity numbers, passport numbers, personal and work email and contact details.	Contract - you have entered into a contractual relationship with us; or consent - you have given your active consent.
Conducting business with SOURCE et cetera as a supplier.	Work email and contact details, certain financial information relating to references, bank accounts and credit cards.	Contract - you have entered a contractual relationship with us.

Website functionality.	Website activity collected through cookie.	Legitimate interest - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect.
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4. DISCLOSURE OF INFORMATION

We may disclose your Personal Information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act Nr 4 of 2013 (“POPIA”).

We may also disclose your information where we have a duty or a right to disclose in terms of law or industry codes, or where we believe it is necessary to protect our rights.

5. SOCIAL NETWORKING SERVICES

SOURCE et cetera makes use of social plugins of social networks such as Facebook, YouTube, LinkedIn, Google+ and Twitter.

Please note that SOURCE et cetera has no influence on or control over the extent of the data retrieved by the social networks’ interfaces and SOURCE et cetera can accordingly not be held responsible or liable for any processing or use of Personal Information transmitted via these social plugins. For information on purpose and extent of the data retrieval by the social network concerned, and about the rights and settings which are available for you to access for the protection of your private information, please refer to the data protection information provided by the social network in question.

The SOURCE et cetera website may contain links to other websites outside of our control. SOURCE et cetera is not responsible for the content, privacy or security of these other third party controlled websites.

SOURCE et cetera makes all reasonable effort to keep its social media and electronic platforms including its website secure at all times, however SOURCE et cetera advises that it cannot guarantee the security of any information provided to us through the SOURCE et cetera website, e-mail, internet or social media sites.

Following this, SOURCE et cetera cannot be held responsible for any loss, or unauthorised use, or interception of information transmitted via these social media and electronic platforms or sites, including its Internet, which is beyond SOURCE et cetera’s reasonable control.

6. CONSENT⁶

We will always set out to get Informed Consent in writing for specific purposes. However, kindly note that your implied consent is established should you fail to advise us that you do not agree with this Policy and you wish to exclude all or some of the provisions of it.

Also, if you directly, or indirectly through a representative acting on your behalf, provide us with your personal information, this will establish indirect consent.

You have the right to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

7. INFORMATION SECURITY

SOURCE et cetera has implemented the appropriate technical and organisational security measures which are required in order to protect all Personal Information and related data which it holds from/or against unauthorised access, accidental or wilful manipulation, loss or destruction.

We will notify you, and the Information Regulator, should we suspect that a data breach has occurred. We are however not liable to you, or any other person, for any harm, loss, damage, destruction or unauthorised access that may occur despite our implementation of such reasonable safeguards.

⁶ Consent is a freely given, specific, informed and unambiguous indication of wishes by clear affirmative statement that gives permission.