

# Permo seal (Pty) Ltd – Privacy Policy



**We respect your privacy. This document is a summary of our privacy policy and contains the most important and relevant points for you. Please read the full privacy policy because it applies to you.**

## Introduction

Welcome to our privacy policy. We are Permo seal (Pty) Ltd (Registration number 2000/011475/07), and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

**The purpose of this policy is to describe the way that we handle your personal information.**

## Audience

This policy applies to you if you are:

- a visitor to our website; or
- a customer who has ordered or requested the goods or services that we provide.

**This policy applies to you under certain circumstances.**

## Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected when you trade with us (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

**Personal information includes information we collect (i) automatically when you visit our website, (ii) when you trade with us, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.**

## Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, or unique identifier of any kind;
- **contact information** – such as your phone numbers, physical or postal addresses and email addresses;
- **financial information** – such as your bank account details; and
- **credit information** – such as credit references or credit history.

## Acceptance

### Acceptance required

You must accept all the terms of this policy when you order or request the goods or services that we provide. If you do not agree with anything in this policy, then you may not order our goods or request our services.

**You may not order or request the goods or services from us if you do not accept this policy.**

### Deemed acceptance

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

### Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

## Changes

We may change the terms of this policy at any time by updating this web page. Changes will not necessarily be preceded by a notice posted on our website, and we encourage you to check this privacy policy periodically for changes. If you do not agree with the changes, then you must stop using our website and ordering our goods or services. If you continue to use our website or to order our goods or services following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

## Collection

### When you trade with us

When you trade with us, you will no longer be anonymous to us. You will be asked to provide us with certain personal information when you apply for credit account facilities, or order or request goods or services from us.

This personal information requested may include your:

- Name and surname;
- Company name;
- Identifiers such as company registration number, identity numbers and VAT number;
- Details of principals such as Shareholders, Members, Partners and Directors;
- Contact persons;
- Email addresses;
- Telephone numbers;
- Registered address, postal addresses and street addresses;
- Accounting officer contact details;
- Bank details; and
- Credit information including credit and trade references.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

When you order or request goods or services from us, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

**We collect certain information when you trade with us, including personal information.**

#### **From browser**

We may use standard technology to receive and record Internet usage information from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on our website, and the dates and times that you visit our website, paths taken, and time spent on sites and pages within our website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

**We collect certain information from your web browser, including your Internet usage information when you visit our website.**

#### **Cookies**

We may utilise temporary or session cookies to keep track of your browsing habits. Cookies are small text files that are placed on your device when you visit a website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your browsing habits with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

**We collect certain information from cookies that we may send to your computer to try and give you a personalised experience.**

#### **Third party cookies**

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

#### **Web beacons**

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

**We collect certain information from web beacons on our website to compile anonymous information about our website.**

## Optional details

You may also provide additional information to us on a voluntary basis (**optional information**). This includes content or product information that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, or otherwise use the optional features and functionality of our website.

**We collect certain optional information, that you may provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys, or use the optional features and functionality of our website.**

## Recording calls

We may record any telephone calls that you make to us unless you specifically request us not to.

## Purpose for collection

We may use or process any personal information, goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for services or quotes and providing our goods or services;
- **customer relationship management purposes** – such as onboarding, sales and account management;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **administrative purposes** – such as keeping your information up-to-date and maintaining records and accounts in general;
- **business purposes** – such as internal audit, accounting, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may collect information about your usage of our website to enable us to:

- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of our website.

**We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.**

## Consent to collection

We will obtain your consent to collect personal information:

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

**We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.**

## Use

### Our obligations

We use your personal information to operate our business, and to fulfil our obligations to you, including the management of our business relationship with you and the provision of goods and services to you. We may use your personal information to conduct business analysis, to gain insight into our business performance and to identify areas for improvement.

## Legislation and regulation

We use your personal information to comply with legislation or regulations requiring us to process personal information.

## Messages and updates

We may send administrative messages and email updates to you, including messages regarding your orders, quotes, invoices and statements, and our pricing to you. We may wish to provide you with information about new goods or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt-into them. But, we may send you one message asking you to opt-into promotional messages without you having opted-into promotional messages.

**We may use your information to send administrative messages and email updates to you, and for marketing purposes where lawful.**

## Targeted content

While you are logged into our website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from our website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

**We may use your information for targeted content in certain, specified instances.**

## Disclosure

### Sharing

We may give the following people your personal information that we process in the ordinary course of business and to fulfill our obligations to you:

- contractors, vendors, or suppliers;
- appointed affiliates, agents, distributors, or other resellers, in which case we will seek to require the appointed agents or affiliates to honour this privacy policy;
- operators, other responsible parties, or co-responsible parties;
- third party technology service providers who provide various services including capturing and organising of data, storing of data, email security, filtering and archiving;
- third parties who help provide certain goods or services or help with parts of our business operations, including supply chain services, debt collection, merchandising, sales and marketing, document and information storage and other relevant services where appropriate;
- credit bureaus to report account information, as permitted by law; and
- third parties, such as a potential purchaser or joint venture partner and its professional advisors, or in the event of any potential change of ownership, organisation or operating model of part or all of our business or assets.

**We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.**

## Regulators

We may disclose your personal information as required by law or governmental audit.

## Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

**We may disclose personal information to third parties if required for legal reasons.**

## No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

## Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, marketing, sales, supply chain, human resources, credit management, accounting, audit, compliance, information technology, or other personnel.

## Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on our website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

We secure data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration and destruction. Our outsourced service providers who process personal information on our behalf undertake to implement security controls. Our security measures are in line with industry practice and include:

- firewalls;
- virus protection software and update protocols;
- logical and physical access controls; and
- secure setup of hardware and software making up the IT infrastructure.

**We will do our best to keep all data in our possession secure and to comply with applicable data protection laws.**

## Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. You are able to review or update any personal information that we hold on you by emailing us at [paia@alcolin.co.za](mailto:paia@alcolin.co.za). Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before making any corrections to your personal information.

**Please keep your personal information accurate and up to date by emailing us.**

## Retention

We will retain your personal information for as long as it is necessary to fulfil the purpose for which it was collected and subsequently processed, unless:

- retention of the record is required or authorised by law;
- we reasonably require the record for lawful purposes related to our business activities;
- we have a contract with you which requires retention of the record; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

**We will only retain your personal information for as long as is necessary.**

## Transfer to another country

We may send personal information outside of South Africa to various countries. We try our best to ensure that we only transfer data to other countries who have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same standard we must protect it. We may store personal information in data centres hosted outside South Africa, which may not have adequate data protection laws. We will endeavour to ensure that our suppliers and service providers will make all reasonable efforts to secure the personal information.

You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

**We may transfer your personal information outside of South Africa to various countries.**

## Updating or removing

You may choose to correct or update the personal information you have submitted to us, by emailing [paia@alcolin.co.za](mailto:paia@alcolin.co.za).

**You may choose to update or remove the personal information you have submitted to us.**

## Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of any third-party websites to which hyperlinks may have been provided. We strongly recommend that you review the privacy policy of any website you visit before using it further.

## Enquiries

If you have any questions about this privacy policy, please contact us by emailing [paia@alcolin.co.za](mailto:paia@alcolin.co.za).