

## PRIVACY POLICY AND NOTICE TO INDIVIDUALS

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of all our clients.
- 1.2 This notice applies where we are acting as a responsible party; in other words, we determine the purposes and means of the processing of that personal data.
- 1.3 In this notice, "we", "us" and "our" refer to BEE TRANSFORMATION SOLUTIONS (PTY) LTD.

### 2 The personal data that we collect

- 2.1 In this Section 3 we have set out the general categories of personal data that we process[ and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data].
- 2.2 We may process data enabling us to get in touch with you ("contact data").[ The contact data may include [your name, email address, telephone number, postal address and/or social media account identifiers.
- 2.3 We may process [your website user account data] ("account data").[ The account data may [include your account identifier, name, email address, business name, account creation and modification dates.
- 2.4 We may process [information contained in or relating to any communication that you send to us or that we send to you] ("communication data"). The communication data may include [the communication content and metadata associated with the communication.
- 2.5 We may process [data about your use of our website and services] ("usage data"). The usage data may include [your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use].
- 2.6 We may process [identify general category of data].[ This data may include [list specific items of data].][ The source of this data is [identify source].]

### 3 Purposes of processing and legal bases

- 3.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2 Operations - We may process [your personal data] for processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control]. The legal basis for this processing is [our legitimate interests, namely [the proper administration of our services and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [specify basis]].
- 3.3 Publications - We may process [account data] for [the purposes of publishing such data through our services in accordance with your express instructions]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [the publication of content in the ordinary course of our operations]] OR [the performance of a contract between you

and us and/or taking steps, at your request, to enter into such a contract] OR [[specify basis]].

- 3.4 Relationships and communications - We may process [contact data, account data, transaction data and/or communication data] for [the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling]. The legal basis for this processing is [our legitimate interests, namely [communications with our visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business]] OR [[specify basis]].
- 3.5 Record keeping - We may process [your personal data] for [the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally]. The legal basis for this processing is our legitimate interests, namely [ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this notice].
- 3.6 Security - We may process [your personal data] for [the purposes of security and the prevention of fraud and other criminal activity]. The legal basis of this processing is our legitimate interests, namely [the protection of our website, services and business, and the protection of others].
- 3.7 Insurance and risk management - We may process [your personal data] where necessary for [the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice]. The legal basis for this processing is our legitimate interests, namely [the proper protection of our business against risks].
- 3.8 Legal claims - We may process [your personal data] where necessary for [the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure]. The legal basis for this processing is our legitimate interests, namely [the protection and assertion of our legal rights, your legal rights and the legal rights of others].
- 3.9 Legal compliance and vital interests - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

#### **4 Providing your personal data to others**

- 4.1 [[Identify personal data category or categories]] will be stored on the servers of our hosting services providers[ identified at [URL]].
- 4.2 We may disclose [specify personal data category or categories] to [our suppliers or subcontractors][ identified at [URL]] insofar as reasonably necessary for [specify purposes].
- 4.3 Financial transactions relating to [our services] [are] OR [may be] handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of [processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds]. You can find information about the payment services providers' privacy policies and practices at [URLs].
- 4.4 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such

disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5 International transfers of your personal data**

- 5.1 We may transfer [your personal data] from South Africa across borders with your prior written consent.
- 5.2 We will make an adequacy determination with respect to [the data protection laws of each of these countries]. [Transfers to [each of these countries] will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the competent data protection authorities, a copy of which can be obtained from [source]] OR [[specify appropriate safeguards and means to obtain a copy]].

## **6 Retaining and deleting personal data**

- 6.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- 6.4 [contact data will be retained for a minimum period of [period] following the date of the most recent contact between you and us, and for a maximum period of [period] following that date];
- 6.5 [account data will be retained for a minimum period of [period] following the date of closure of the relevant account, and for a maximum period of [period] following that date];
- 6.6 [transaction data will be retained for a minimum period of [period] following the date of the transaction, and for a maximum period of [period] following that date];
- 6.7 [communication data will be retained for a minimum period of [period] following the date of the communication in question, and for a maximum period of [period] following that date];
- 6.8 [usage data will be retained for [period] following the date of collection].
- 6.9 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7 Your rights**

- 7.1 Your principal rights under data protection law are:
  - (a) the right to access - you can ask for copies of your personal data;
  - (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) the right to erasure - you can ask us to erase your personal data;

- (e) the right to object to processing - you can object to the processing of your personal data;
- (g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.2 These rights are subject to certain limitations and exceptions.

7.3 You may exercise any of your rights in relation to your personal data [by written notice to us, using the contact details set out below].

## 8 Amendments

8.1 We may update this notice from time to time by publishing a new version on our website.

8.2 You should check this page occasionally to ensure you are happy with any changes to this notice.

8.3 We [may] OR [will] notify you of [changes] OR [significant changes] to this notice [by email].

## 9 Our details

9.1 We are registered in the REPUBLIC OF SOUTH AFRICA under registration number: **2018/453792/07**, and our registered office is at MIDLANDS OFFICE PARK WEST CO WORK MOUNT QUARRAY STEET MIDSTREAM 1692.

9.2 Our principal place of business is at [address].

9.3 You can contact us:

- (a) PRIVATE BAG X1007 POSTNET SUITE NR 1718 LYTTLETON 0140;
- (b) [www.btranssol.co.za](http://www.btranssol.co.za);
- (c) the contact number published on our website; or
- (d) [admin@btranssol.co.za](mailto:admin@btranssol.co.za)

## 16. Information Officer

16.1 Our Information Officer's contact details are: *Carla Badenhorst* [carla@btranssol.co.za](mailto:carla@btranssol.co.za)