

## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of [our website visitors, service users, our members, employer and employees, individual customers and customer personnel].
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data.
- 1.4 In this policy, "we", "us" and "our" refer to **ISPCO (SA)(Pty)Ltd.**

### 2. The personal data that we collect

- 2.1 In this Section 2 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]. [The source of the contact data is [you and/or your employer OR your Authorised representative]
- 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, website settings and marketing preferences]. [The primary source of the account data is [you and/or your employer, although some elements of the account data may be generated by our website]. [If you log into our website using a social media account, we will obtain elements of the account data from the relevant social media account provider.]
- 2.4 We may process [information relating to returns processing, including any information of your employees that you add or delete or edit, that you provide to us and/or through our online Returns system or manual information update, or through our website] ("**transaction data**"). The transaction data may include [your name, your contact details, your payment card details (or other payment details) and the returns processing details]. The source of the transaction data is [you and/or our payment services provider].
- 2.5 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].

- 2.6 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]. The source of the usage data is [our analytics tracking system].
- 2.7 We may process *[use and disclose your information in a number of ways related to your use of our site. We may use your personal identifying information in connection with sending you specific, targeted information that may be of interest to you relating to the activities of IPSCO (SA)(Pty)Ltd. We may use your contact information, such as your e-mail address, to acknowledge your request for information or for other similar purposes.]*. [This data may include *[Name, Surname, Company Name, Job Position, Email, Phone Number, Address, Credit Card Details or banking details]*]. [The source of this data is *[for generating payments and record keeping purposes to register members in the motor Industry]*].

### 3. **Purposes of processing and legal bases**

- 3.1 In this Section 3, 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 [the purposes of giving access and maintaining correct data on online returns system, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control, for enforcement of any contravention in the Industry]. The legal basis for this processing is [our legitimate interests, namely [the proper administration of our online system, supplier database capturing, services and business as well as enforcement of collective agreements] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract]
- 3.3 **Publications** - We may process [account data] for [the purposes of publishing such data on our website and elsewhere through our services in accordance with your express instructions]. The legal basis for this processing is [data processing of members in the company] 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 [Representing you at any forum].
- 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 website visitors, service users, individual customers and customer personnel, our stakeholders, the adjudicators, Authorities, the maintenance of relationships, and the proper administration of our online Returns system, website, services and business] OR [any other ways in which you consented to, in order to provide service to you].

- 3.5 **Research and analysis** - We may process [usage data and/or transaction data] for [the purposes of researching and analysing the use of our online system, services on compliance and registration, website, as well as researching and analysing other interactions with our company]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [monitoring, supporting, improving and securing our online system, website, services and business generally] OR [improving our services to you]].
- 3.6 **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 policy].
- 3.7 **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 online system, website, services and business, enforcement and the protection of others].
- 3.9 **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].
- 3.10 **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].
- 3.11 **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 We may disclose [your personal data] to [our insurers and/or professional advisers, stakeholders, Regulators and/Authority, regulated departments, our Funds] insofar as reasonably necessary for the purposes of [obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, complying with the law with regards to the obligation we have in law towards such departments or regulators].
- 4.2 [Your personal data held in our website database] OR [Online return system and/or sales Logix, Sage X3 (SLX)] will be stored on the servers of our hosting services providers [identified at [SageX3= SRV-SSCX301(Application Server), SRV-SSCSQL2(Database Server); SLX= MIBJHBFS01 (Application Server), SRVSSCSQL1 (Database Server)].

- 4.3 We may disclose *[specify personal data category or categories]* to *[our suppliers or subcontractors]* insofar as reasonably necessary for *[proving service or receiving service in the course of our business]*.
- 4.4 Financial transactions relating to *[our Sage X3, SLX, website and services]* *[are]* OR *[may be]* handled by our payment services providers, *[Standard bank]*. 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 *[https://www.standardbank.co.za/southafrica/personal/aboutus/legal/privacystatement]*.
- 4.5 In addition to the specific disclosures of personal data set out in this Section 4, 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. Retaining and deleting personal data

- 5.1 This Section 5 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.
- 5.2 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.
- 5.3 We will retain your personal data as follows:
- (a) *[contact data no longer in use or once you cease to be a member/ client/ in any form of relationship with us, will be retained for a minimum period of [Five Years] following the date of the most recent contact between you and us, and for a maximum period of [Ten Years] following that date];*
  - (b) *[account data will be retained for a minimum period of [Two years] following the date of closure of the relevant account, and for a maximum period of [Five years] following that date];*
  - (c) *[transaction data will be retained for a minimum period of [Five Years] following the date of the transaction, and for a maximum period of [Ten Years] following that date];*
  - (d) *[communication data will be retained for a minimum period of [Five Years] following the date of the communication in question, and for a maximum period of [Ten Years] following that date];*
  - (e) *[usage data will be retained for [as long as it is still in use] following the date of collection];* and
  - (f) *[Employer/ Employee data] will be retained for a minimum period of [Five Years] following the date from which the employer has ceased trading or employee no longer working in the Motor Industry, and for a maximum period of [Ten Years].*

- 5.4 Notwithstanding the other provisions of this Section 5, 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.
- 5.5 If you want to see the personal information we have collected about, or if you believe any information we have is incorrect and you wish to correct it, please write to our Deputy Information Officers at the branch where you are based as per the below details, or alternatively you can contact the Information Officer at this email address: [\[insert email address\]](#). If we change or delete information in response to your request, we will discontinue using it within the time frame as stated above; however, some information may remain in backup records and may take time to be ultimately purged.

## 6. Your rights

- 6.1 In this Section 6, we have listed the rights that you have under POPI Act.
- 6.2 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;
  - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
  - (e) **the right to object to processing** - you can object to the processing of your personal data;
  - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
  - (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, on condition that personal information previously consented to remains a valid consent.
- 6.3 These rights are subject to certain limitations and exceptions.
- 6.4 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].

## 7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website without any notice to you.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We [may] OR [will] notify you of [changes] OR [significant changes] to this policy [by email].

## 8. Our details

- 8.1 This website is owned and operated under the name [insert website address].
- 8.2 You can contact us through our Deputy Information Officer located in each branch at the following addresses:

Lynette du Toit  
IPSCO Office Secunda  
HIZ Place Building  
Office Number 2  
Secunda

## 9. Information officer

- 9.1 Our Information officer's contact details are: By Phone: 017 634 8169  
By Email: [lynette@ipsco.co.za].

## 10. Disclaimer

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