

Private Policy in terms of the Protection of Personal Information Act, 2013 (POPI) (South Africa)	
Organisation	CraigCor
Scope of Policy	This policy applies to the CraigCor wherever it is conducted and applies to staff.
Policy operational date	1 January 2020
Policy owner	W Jansen van Vuuren
Date approved by Information Officer	
Policy review date	Annually in December

Introduction

Purpose of policy	The purpose of this policy is to enable CraigCor to: • comply with the law in respect of the data it holds about individuals; • follow good business practice; • protect CraigCor's stakeholders including staff, customers, suppliers and other individuals; • protect the organisation from the consequences of a breach of its legal responsibilities;
Personal information	This policy applies to personal information relating to identifiable individuals, as contemplated in the Protection of Personal Information Act, 2013 (hereinafter POPI Act)
Policy statement	CraigCor will: • comply with both the law and accepted good practice; • respect individual's right to privacy; • be open and honest with individuals whose data is held • provide training and support for staff who handle personal information (as defined), so that they can act confidently and consistently within the law CraigCor recognises that its first priority under the POPI Act is to avoid causing harm to individuals. In the main this means: • keeping personal information securely in the right conditions with limited access, and • holding good quality information; Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent,

	CraigCor will seek to give individuals as much choice as is legally required over what data is held and how it is used.
Key risks	ARB does not store much “personal information” as defined so the risk is assessed as low. The largest risk is individuals’ information in personnel records and debtors master files. CraigCor has identified the following potential key risks, which this policy is designed to address: • breach of security by allowing unauthorised access or inappropriate dissemination of personal information; • failure to offer ‘choice’ about use of personal information when appropriate; • data operator and data access controls.

Information Officer Responsibilities

Information Officer	• Publishing, training and maintaining this POPI Policy which addresses all provisions of the POPI Act relevant to the Group, including but not limited to the following; • ensuring that periodic ‘awareness communication’ on POPI act responsibilities takes place; • ensuring that appropriate access controls (Security Safeguards, in line with the POPI Act) for personal information are in place • Ensuring that procedures, rules and controls are in place to prevent Private information from being accessed by or distributed to anyone, other than for the specific performance of their company duties. • Personally dealing with ‘not in the ordinary course’ data access requests; • approving contracts with Data Processors and ensuring the required controls and confidentiality provisions are in place. • Referring all aspects of relationship with the Regulator as foreseen in the POPI Act to the group CFO. Provide direction to any Deputy Information Officer, if and when appointed.
Enforcement	Significant breaches of this policy will be dealt with under CraigCor’s disciplinary procedures.

Confidentiality

Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 7.
Understanding of confidentiality	CraigCor will comply with all of the Conditions for Lawful Processing of Personal Information as defined in the POPI Act and as covered under Condition 7.

Communication with data Subjects	CraigCor will comply with conditions 8 of the POPI Act. CraigCor will have a "Privacy Notice" for "Data Subjects", setting out how their Personal Information will be used. This will be available on request, and a version of this notice will also be used on the CraigCor web site. (See Appendix A).
Communication with staff	Staff will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities (refer annexure B attached hereto). New staff must have this clause inserted into their employment contracts.
Authorisation for disclosures not directly related to the reason why data is held	Where anyone within CraigCor feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the specific prior written authorisation of the POPI Act Information Officer. All such disclosures will be documented in a register maintained by the information officer.

Security Safeguards

Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 7. This section of the policy only addresses security issues relating to Personal Information. It does not cover security of the building, business continuity or any other aspect of security.
Specific risks	CraigCor has identified the following risks: • staff with access to personal information could misuse this information. • staff may be tricked into giving away information, either about customers, suppliers or colleagues, for example over the phone, through "social engineering", or fake information requests received by e-mail.
Setting security levels	Access to information on the main CraigCor computer systems will be controlled by password access and limited by functional access.
Security measures	The information officers will review all access profiles annually (in December) to ensure that all necessary access controls to Personal Information are in place. Unnecessary accesses will be removed

Information quality

Accuracy	CraigCor will comply with all of the aspects of Conditions 5 and 7. CraigCor will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular: • Financial / payroll systems will be designed, where possible, to encourage and facilitate the entry of accurate data; • Personal information on any individual will be held in as few places as necessary, • all staff will be discouraged from establishing unnecessary additional data sets of personal information; • Effective procedures will be in place so that all relevant systems are updated when information about any individual changes; • Staff who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping (for example Personal information about contact details (telephone directories) .
Updating	CraigCor will review all Personal Information on an annual basis in December of each year.
Retention periods	CraigCor will establish retention periods for at least the following categories of data: • Directors & staff • Customers & suppliers These retention periods will be the minimum as required by current legislation, unless otherwise justified by the applicable Information Officer.
Archiving	Archived electronic records of CraigCor are stored securely off site in a variety of ways. Contracts must be implemented with appropriate Data Operators. Archived paper records are stored on site in a secure and protected environment.

Data Subject Access

Responsibility	Any <u>subject access</u> requests will be handled by the POPI Act Information Officer in terms of Condition 8.
Procedure for making request	Subject access requests must be in writing. All staff are required to pass on anything which might be a subject

	access request to the POPI Act Information Officer without delay. Requests for access to personal information will be handled in compliance with the POPI Act. Specifically, this SOP used the PAIA manual.
Provision for verifying identity	Where the individual, making a subject access request, is not personally known to the POPI Act Information Officer their identity will be independently verified and approved by the 'Information officer' before handling over any information.
Charging	Fees for access to personal information will be handled in compliance with the PAIA Act.
Procedure for granting access	Procedures for access to personal information will be handled in compliance with the PAIA Act.

Openness

Commitment	In line with Conditions 6 and 8 of the Act, CraigCor is committed to ensuring that in principle Data Subjects are aware that their data is being processed and retained and • for what purpose is being processed; • what types of disclosures are likely; and • how to exercise their rights in relation to the data.
Procedure	Data Subjects will generally be informed in the following ways: • Staff: through this policy • Customers and other interested parties: through the CraigCor Privacy Notice.

Data Subject Consent

Underlying principles	CraigCor undertakes to comply with the POPI Act, Conditions 2 and 8 in terms of Data Subject Consent. Consent will normally not be sought for most processing of information about staff and customers, with the following exceptions: • Staff details will only be disclosed for purposes unrelated to their work for CraigCor (e.g. financial references) with their consent.
Forms of consent	CraigCor undertakes to gain written consent where requested by the Data Subject, otherwise verbal consent will suffice.
Withdrawing consent	CraigCor undertakes to comply with the POPI Act in terms of all specific Data Subject Consent withdrawals.

Direct Marketing

Underlying principles	CraigCor undertakes to comply with the POPI Act Chapter 8 in terms of Data Subject Consent for Direct Marketing by Electronic Communications.
“Opting in”	Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to “opt in”.
Sharing lists	CraigCor has the policy of sharing lists (or carrying out joint or reciprocal mailings) only on an occasional and on a tightly controlled basis. Details will only be used for any of these purposes where the Data Subject has been informed of this possibility, with an option to “opt out” and they have not exercised this option. CraigCor undertakes to obtain external lists only when the list provider guaranteed that the list is up to date and those on the list have previously been given an opportunity to opt out.
Electronic contact	CraigCor will only carry out telephone marketing where consent has been given in advance, or consent is gained when first contact is made. Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.

Prohibition on Processing of Special Personal Information

Special Person Information	“Special Personal Information” is information that relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life or biometric information of a data subject. Special Personal Information also includes criminal behaviour relating to alleged offences or proceedings that have not yet been found guilty in a court of law. Unless specific consent is provided or a legal ‘general authorisation’ relating to the different types of special personal information applies, ARB will not capture or process or retain any Special Personal Information.
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Processing of Personal Information of Children

Personal Information of Children (Think staff bursary recipients)	Prohibition on processing personal information of children only applies for under-18 individuals, so age check is required for all Personal Information records.
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	'General authorisation' is required to process Personal Information of children where an under-18 data subject involved.
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Transborder information flows

Transfers of Personal Information outside the Republic	CraigCor will ensure that the POPI Act Chapter 9 is fully complied with. This will be covered under contracts with Data Operators.
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Staff training and acceptance of responsibilities

Documentation	Information for staff as required by the POPI act is contained in this policy document [and other training materials made available by the Information Officer].
Induction	The Information Officers will ensure that all staff who have access to any kind of Personal Information will have their responsibilities outlined during their induction procedures.
Continuing training	CraigCor will provide opportunities for staff to explore POPI Act issues through training, team meetings, and supervisions.
Procedure for staff signifying acceptance of policy	The Information Officers will ensure that all staff sign acceptance of this policy once they have had a chance to understand the policy and their responsibilities in terms of the policy and the POPI Act.

Policy review

Responsibility	CraigCor Information Officer is responsible for an annual review of this SOP to be completed prior to the policy anniversary date.
Procedure	CraigCor Information Officer will ensure relevant stakeholders are consulted as part of the annual review to be completed prior to the policy anniversary date.

CRAIGCOR CUSTOMER PRIVACY NOTICE**APPENDIX “A”****Contents**

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Introduction

We respect the privacy of everyone who visits this website. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you read this Customer Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this web site, you acknowledge that you have reviewed the terms of this Customer Privacy Notice and Consent to Use of Personal Information (the “Customer Privacy Notice and Consent”) and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to use our site, and please do not provide any Personal Information through this site. This Customer Privacy Notice and Consent forms part of our Site Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At CraigCor we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

Who we are

CraigCor is a subsidiary of ARB Holdings, a JSE listed entity which provides transparent reporting on how the group conducts its business. The group is a leading distributor of electrical products such as cable and cable accessories, Overhead Line products (for power distribution) and a wide range of low voltage electrical products such as lighting fittings and lamps, switches and sockets, trunking and conduit, process automation products, earth leakages and circuit breakers, wire and accessory products, tools and thousands of products related to the last mile distribution of electrical power.

The information we collect

• Collection of Personal Information

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or service from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide us and what information is optional.

Examples of information we collect from you are:

- Name and address
- email address and telephone / cell number of key contacts
- Identification numbers (where you are a sole trader or a director of a customer)
- Any prefinances that you provide us with (location, etc)
- user-generated content, posts and other content you submit to our web site

We also collect information about you from other sources as explained below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in the electrical / retail / wholesale industry in order to offer you a more consistent and personalised experience in your interactions with CraigCor.

• Collection of Non-Personal Information

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this information and it is only used to assist us in providing an effective service on this web site. We may from time to time supply third parties with this non-personal or aggregated data for users in connection with this web site.

• Cookies policy

We use the term “cookies” to refer to cookies and other similar technologies left on your web browser to speed up your internet experience and reduce frustration to you by a slow site requiring the same information continuously – as covered by the POPI Act on privacy in electronic communications.

• What is a cookie

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies they can help a website

deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

- **Why do we use cookies**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies 'remember' the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer. For further details on the various types of cookies that we use, please read our cookie policy.

- **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third-party websites for information regarding their use of cookies. For further details on the third-party cookies that we use, please read our page on cookie types.

- **How do I reject and delete cookies?**

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by ARB or the websites of any third party suppliers by changing your browser settings – see the 'Help function' within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies, while you will still be able to visit our websites the speed, responsiveness some of the functions may not work correctly or as desired.

How we use your information

We will use your Personal Information only for the purposes for which it was collected or agreed with you, for example:

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our service
- For market research purposes
- To assist with business development
- For the detection and prevention of fraud, crime, 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
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply us, or when it is otherwise allowed by law
- For monitoring and auditing site usage
- Evaluate the use of the site, products and services
- Analyse the effectiveness of our advertisements, competitions and promotions
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it
- Make the site easier to use and to better tailor the site and our products to your interests and needs
- Help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time
- Collect information about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal Information so as to ensure that the site presents the best web experience for you
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within any time frames established by applicable laws
- Suggest products or services (including those of relevant third parties) which we think may be of interest to you
- Offer you the opportunity to take part in competitions or promotions
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out
- To respond to your queries or comments
- Where we collect Personal Information for a specific purpose such as competitions, promotions, and the like, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our

services we may not immediately delete residual copies from our servers or remove information from our backup systems.

Disclosure of Personal Information

We may disclose your Personal Information to our service providers who are involved in the delivery of products or services to you where we have agreements in place to ensure that they comply with these privacy terms.

We may share your Personal Information with, and obtain information about you from:

- Third parties for the purposes listed above;
- Other companies in the electrical / retail / wholesale / DIY markets when we believe it will enhance the services and products, we can offer to you, but only where you have not objected to such sharing;
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Personal Information Security

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to Personal Information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

Access to your Personal Information

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy.

Correction of your Personal Information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

Definition of Personal Information

According to the POPI Act “**Personal Information**” means information relating to an identifiable. Living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

www.gov.za/documents/download.php?f=204368

Changes to this notice

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

How to contact us

If you have any queries about this notice or believe we have not adhered to it, or need further Information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website www.craigcor.com in the CraigCor PAIA Manual.

**APPENDIX B: CRAIGCOR POLICY
FOR OBTAINING CONSENT FROM CUSTOMERS**

CraigCor collects personal information from when you register with us for business purposes. We will only use this information to carry out the processes for the purpose for which you registered with us. An example of this is applying for credit as a distributor. We will protect your personal information provisions in accordance with our Customer Privacy Notice and the provisions of the Protection of Personal Information Act, 2013 (South Africa). If you agree, we will use your information to send marketing information to you.

CraigCor will not share your personal information with external companies.

Personal Information will be protected in accordance with the conditions contained in Protection of Personal Information Act, 2016 (South Africa).

For more information explaining how we use your personal information, please see our Customer Privacy Notice available at www.craigcor.com

**APPENDIX C: CRAIGCOR POLICY
FOR CONDITION FOR SPECIFIC PURPOSE**

CraigCor will only collect personal information from when the purpose for collection been explicitly defined and agreed. We undertake to ensure that as the data subject, you are aware of the purpose for collecting your personal information.

Where reasons for processing for further purposes arise, these will be explicitly defined and agreed.

For more information explaining how we use your personal information, please see our Customer Privacy Notice.

**APPENDIX D: CRAIGCOR POLICY
FOR ENSURING INFORMATION QUALITY**

CraigCor will take reasonable steps to ensure that information is complete, accurate, not misleading and, where necessary, updated.

CraigCor will ensure that appropriate information security measures are established to ensure that personal information is protected in line with industry practices and standards.

For more information explaining how we use your personal information, please see our Customer Privacy Notice available at www.craigcor.com

**APPENDIX E1: CRAIGCOR POLICY
FOR NOTIFICATION TO DATA SUBJECT
(POLICY)**

CraigCor will ensure that you, as data subject, are made aware of information being collected. If the data has not been collected directly from the data subject, the source of collection will be provided together with name and address of the party. The purpose of collection will be provided.

Information relating to the following will also be provided where relevant:

- Whether the supply of information by the data subject is voluntary or mandatory;
- The consequences of failing to provide information;
- The legislation requiring the collection of information;
- If information is to be transferred to another country, information relating to the laws that will protect the information.

**APPENDIX E2: CRAIGCOR POLICY
FOR NOTIFICATION TO DATA SUBJECT
(POLICY)**

CraigCor hereby notifies you that your personal information has been collected. Information was collected from XYZ (Pty) Ltd, for the purposes of (state purpose e.g. granting credit).

The collection of this information is mandatory in order to satisfy the requirements of the National Credit Act. Failure to collect this information will prevent your application from being processed and may constitute an infringement of the National Credit Act should your application be processed.

For more information explaining how we use your personal information, please see our Customer Privacy Notice available at www.craigcor.com