



Business Consulting / Executive Coaching
& Mentoring / Counselling

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**PRIVACY POLICY
OF
ADINSPIRED (PTY) LIMITED (2024/229223/07)
("Adinspired" / the "Responsible Party")**

IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 ("POPI ACT")

Adinspired (referred to herein as "we"/"our"/"us") is a *Responsible Party* as defined in the POPI Act. We are committed to protecting the privacy of our *Data Subjects* being our clients, prospective clients and employees' Personal Information ("PI") as required by the POPI Act.

We agree that your PI shall be processed appropriately, transparently, securely and in accordance with the law and we will only process the PI for the purpose that we need it based on the services you require in terms of our business consulting of the FMCG industry (Fast Moving Consumable Goods) including executive coaching and mentoring to management and leaders across this industry. Thus, in order for us to help you, you will have to share some of your PI with us. We will use our best endeavours to keep it confidential.

This Policy sets out how we collect and use your PI and to describe the way that we handle your PI.

This Policy applies to you if you are a visitor to our website or a client who has given us a mandate in terms of the services we render, in terms of which you consent for us to use your PI to carry out the services we render. You may only send us your own PI if you are 18 years or older, someone else's PI if they are older than 18 and you have their permission to do so, or a child's personal information provided you are regarded as a *competent person* under the Act and have signed our Consent Form. Kindly note we may, from time to time, update this Policy to accommodate changes in our business or changes to the law.

1. THE PURPOSE OF THE ACT

- 1.1 In terms of the Constitution, 1996 everyone has a right to privacy which includes a right to protection against the unlawful collection, retention, dissemination and use of personal information.
- 1.2 The purpose of the POPI Act is to regulate in harmony with international standards and our Constitution, the processing of personal information by public and private bodies in a manner that

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gives effect to the right to privacy- subject to justifiable limitations that are aimed at protecting other rights and important interests.

2. WHAT IS PERSONAL INFORMATION?

2.1 Personal Information is data of a natural (or juristic person's) which includes but is not limited to–

- Names, addresses, telephone and cellular numbers, email addresses
- ID number, an entity's registration number, symbol, email address, physical address, location or online identifiers;
- Education history;
- biometrics;
- personal opinions, views or preferences;
- gender, age, sex, pregnancy, marital status or sexual orientation; and/or
- national, ethnic or social origin, race or colour; and

3. SPECIAL PERSONAL INFORMATION

3.1 Depending on the services that you require, we may (albeit rarely) also collect special PI including your/your child's:

- medical information and records;
- financial information – such as your bank account details;
- sensitive demographic information – such as your race or ethnicity;
- sexual information – such as information about your sex life or sexual orientation;
- criminal information – such as information about the commission or alleged commission of any offence or about any related legal proceedings relating to you;
- employment information – including your membership of a trade union; and
- beliefs – including your political or religious beliefs.

4. INFORMATION WHICH IS NOT PROTECTED UNDER THE POPI ACT

4.1 There are times when PI is not protected under the POPI Act:

- 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;
- information within the public domain for example information you have agreed to place on platforms such as Facebook, Instagram, LinkedIn, Tik-Tok, google.
- public information which another entity may have made available to the public e.g. the CIPC.
- when a company is exempted by the Information Regulator; or

- when government or law enforcement agencies require such information in the execution of their statutory mandates.

5. WHAT DOES PROCESSING INCLUDE?

Processing includes collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, transmission and dissemination erasure and/or destruction.

6. CONDITIONS FOR LAWFUL PROCESSING

- 6.1 As provided for in Chapter 3 of the POPI Act, there are eight conditions for lawful processing which the Responsible Party must abide by. These include:
 - 6.1.1 Accountability
 - 6.1.2 Processing limitation
 - 6.1.3 Purpose specification
 - 6.1.4 Further processing limitation
 - 6.1.5 Information quality
 - 6.1.6 Openness
 - 6.1.7 Security safeguards
 - 6.1.8 Data subject participation
- 6.2 Should you require more information on the above, please contact the appointed Information Officer named herein.

7. YOUR LEGAL RIGHTS

- 7.1 Under certain circumstance, you have the following rights under data protection laws such as the POPI Act:
 - 7.1.1 The right of access: the right to obtain confirmation as to whether or not personal data are being processed, and, where that is the case, access to the personal data along with details regarding the nature of the processing.
 - 7.1.2 The right of rectification: your right to rectification of inaccurate personal data.
 - 7.1.3 The right of portability: your right to receive your personal data in a structured, commonly used and machine-readable format.
 - 7.1.4 The right to be forgotten: your right to erase your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
 - 7.1.5 The right to restrict processing: your right for your data to be effectively ‘frozen’; stored and not further processed.

- 7.1.6 The right to object: your right to object to how your personal data is processed where we are relying on a legitimate interest (or those of a third party).
- 7.1.7 If you would like exercise one of your rights listed above, please send an email to Alun@adinspired.co.za and confirm the right you wish to exercise together with details of the data in respect of which you are exercising such right.

8. INFORMATION OFFICERS AND DEPUTY INFORMATION OFFICERS

- 8.1 Our Director is responsible for ensuring compliance with the POPI Act and this Policy. In order to assist the Director with discharging his duties a nominated deputy Information Officer who may be appointed.
- 8.2 Below are the contact details of the Information Officer/Deputy should you have any questions or ask about your rights in terms of the POPI Act:
Director: Alun Davies
Tel: +27 83 630 5662
E-mail: alun@adinspired.co.za

9. HOW WILL WE USE YOUR PERSONAL INFORMATION?

- 9.1 We process your PI to conclude a contract/verbal mandate with you and to meet our contractual obligations. Therefore, when you contact us through our website, via email, telephone, or social media, we use the information we collect to reply to, investigate and resolve your query, complaint, or request. Certain information may be collected by us through the storage of cookies on your device.
- 9.2 We process your personal information because it is in your or our legitimate interest to do so, because we are legally required to do so, or because you have given us permission and to conduct the services you require.
- 9.3 We may process your information further for historical, statistical or research purposes when we perform data analytics on our membership or client bases. We may do this to gain market insights into our different bases and improve our service offerings.

10. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 10.1 We may disclose your data to third parties such as:

- 10.1.1 authorised third-party service providers who provide IT and administration services to us to help us to provide our services, including the provider of our cloud system and/or other software solutions used by us in the provision of our services; or
- 10.1.2 other third-party data processors for analytics and communication purposes, to help us to provide our services.

- 10.2 We use service providers to provide us with customer relationship management software, IT services, provide cloud storage services, perform audits and do our income taxes, including to conduct our operations as a business.
- 10.3 We only share the minimum amount of your information to effect the mandate properly. Our service providers agree to keep your information secure and confidential and only use your information for the purposes for which we shared it with them. Some of the service providers that we use may be in other countries. When we share information with service providers located in other countries that may not have the same levels of protection of personal information as South Africa, they must undertake to protect your PI to the same level that we do. Therefore, we provide for appropriate safeguards before we share.

11. MARKETING AND PROMOTIONAL OFFERS

- 11.1 We always want you to be aware of how we use your data, particularly around marketing and advertising. We may use your identity, technical, usage and marketing data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which of our services and offers may be relevant for you. We request that you sign our Form 4 – Consent for marketing in order for us to know which manner we may contact you for direct marketing purposes.
- 11.2 You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition, registered for a promotion or when you complete a form on our website to download some of our content and, in each case, you have not opted out of receiving that marketing. Should you opt-out we shall not contact you again in terms of your wishes.

12. THIRD-PARTY MARKETING AND OPTING OUT

- 12.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Kindly note we may only contact you once via email, SMS and/or by telecommunication, if you opt-out of any, we shall ask that you sign our Form 4 in accordance with the POPI Act.
- 12.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a when you purchased services from us or when you have provided us

with further information in connection with the use of our services, such as when you submit a support ticket or enter into a live chat on our website.

13. COOKIES

- 13.1 A cookie is a small file containing a string of characters that is sent to your device when you visit a website. When you participate in our services/research online, we and/or our third-party partners may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them or they expire – usually after 1 year). Should you require further information or detail in relation to the cookies that we and/or our third-party partners may use, please contact us.
- 13.2 We and our partners use cookies to provide you with the best possible user experience, and also to track your online activity for the following purposes:
 - 13.2.1 to improve your experience on our website; and
 - 13.2.2 to track browsing activity, patterns and preferences to enable us to provide you with the best user experience; for example, to customise our content (such as language) to your location; or
 - 13.2.3 to measure user engagement on our website.
- 13.3 We track the activity of users to our website to understand which parts of our website are most popular with visitors to our site. We may use this information to understand which of our services may be of interest to you. You can adjust your cookie settings on your browser if you need assistance please contact us.

14. KEEPING YOUR PERSONAL INFORMATION SECURE

- 14.1 Reasonable technical and organisational measures are in place to protect your PI against, among other things, loss, abuse and unauthorised access. To protect your PI, we have the following procedures in place:
 - 14.1.1 educating our staff to manage information securely.
 - 14.1.2 we only give access to your personal information to those parties on a need-to-know basis, who need to process your PI according to the purposes for which it was given.
 - 14.1.3 ICT measures and other electronic information
 - 14.1.4 we continuously review our security controls.
- 14.2 Even though we regularly monitor our systems for any loopholes, no system is perfect and thus we cannot be 100% guaranteed that no authorised access will happen as hackers do find ways to enter systems and breach physical, technical, or managerial safeguards.

14.3 We will inform you of any breaches affecting your personal information or whether your data has been compromised and will report same to the Information Regulator.

15. TIME PERIODS OF STORING YOUR INFORMATION

15.1 We keep records of your personal information, which are essential for historical, commercial and legal purposes.

15.2 We retain your personal information for as long as we have a legitimate reason to keep it. These periods vary depending on the type of personal information, the reason we originally collected it and/or if the law requires that we keep it for a specific retention period. We will not keep your personal information longer than we need to or are legally required to keep.

16. THE INFORMATION REGULATOR

16.1 The Information Regulator is empowered to monitor and enforce compliance by public and private bodies in terms of the provisions of the POPI Act.

16.2 Should you wish to lodge a complaint in the event that you are of the opinion that your rights were infringed, the Information Regulator's details are:

The Information Regulator (SA)
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address: P.O Box 31533, Braamfontein, Johannesburg, and
E-mail address: complaints.IR@justice.gov.za
Tel: 010 023 5200
Website: <https://inforegulator.org.za/>

17. CONTACT DETAILS FOR QUESTIONS

We may from time to time update this Policy based on amendments required by law. If you have any queries about this Policy or you need further information about our privacy practice or wish to exercise your rights please contact Alun Davies (Information Officer) at Alun@adinspired.co.za / +27 83 630 5662.