



## VISITOR'S PROCESSING NOTICE

IN TERMS OF SECTION 18 THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

FOR



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## Content

1	Introduction .....	3
2	Who we are? .....	6
3	Applicability of this Visitor's Processing Notice .....	6
4	Purpose For Processing Your Personal Information .....	7
5	What Personal Information or Information Do We Collect from You? .....	7
6	Sharing And Retaining Your Personal Information .....	8
7	Security Of Information .....	9
8	Your Rights .....	9
9	Contact Us.....	10
10	Changes To This Notice .....	10
11	Complaints .....	10
12	Acceptance.....	11

## 1 Introduction

Welcome to our Visitor's Processing Notice. This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of your Personal Information very seriously. The purpose of this Notice is to describe the way that we collect, store, use, and protect data 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).

This Notice and Consent forms part of our 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). We are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

We recommend that you read this Notice and Consent so that you fully understand our approach towards the use of your Personal Information.

For the purpose of this Processing Notice, please take note of the following words and phrases which will be used throughout this Processing Notice:

- "consent", means the consent, which you give to us to process your Personal Information. This consent must be voluntary, specific and informed. Following this, once we have explained to you why we need your Personal Information and what we will be doing with it, you are then, in relation to certain uses of the information, required to give us your permission to use it, which permission or consent can be express or implied; implied meaning that consent may be demonstrated by way of your actions;
- "Data Subject", means you, the person who owns and who will provide us with your Personal Information for processing, which reference is found under POPIA;
- "Operator" is any person who processes your Personal Information on our behalf as a sub-contractor, in terms of a contract or mandate, without coming under the direct authority of us. These persons for illustration purposes may include verification agencies, advertising and public relations

agencies, call centres, service providers, auditors, legal practitioners, organs of state, government, provincial and municipal bodies;

- "Personal Information", means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing juristic person, including, but not limited to:
  - o your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
  - o vehicle registration;
  - o dietary preferences;
  - o financial history;
  - o information about your next of kin and or dependents;
  - o information relating to your education or employment history; and
  - o Special Personal Information including race, gender, pregnancy, national, ethnic or social origin, colour, physical or mental health, disability, criminal history, including offences committed or alleged to have been committed, membership of a trade union and biometric information, such as images, fingerprints and voiceprints, blood typing, DNA analysis, retinal scanning and voice recognition;
- "processing" / "process" or "processed", means in relation to Personal Information, the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; merging, linking, as well as restriction, degradation, erasure or destruction of information; or sharing with, transfer and further processing, including physical, manual and automatic means. This is a wide definition and therefore includes all types of usage of your Personal Information by us including the initial processing when we first collect your Personal Information and any further and ongoing processing;
- "Purpose" means the reason why your Personal Information needs to be processed by us;

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- "Responsible Party, means us, the person who is processing your Personal Information;
  - "You" means you, the Data Subject under POPIA, who will be providing us, the Responsible Party with your Personal Information, for processing.

In terms of POPIA, where a person processes another's Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.

In order to comply with POPIA, a person processing another's Personal Information must:

- provide the Data Subject or owner of the Personal Information with a number of details pertaining to the processing of the Personal Information, before such information is processed; and
- get permission or consent, explicitly or implied, from the owner / Data Subject, to process the Personal Information, unless such processing:
  - is necessary to carry out actions for the conclusion or performance of a contract to which the owner / Data Subject of the Personal Information is a party;
  - is required in order to comply with an obligation imposed by law; or
  - is for a legitimate purpose or is necessary to protect the legitimate interest (s) and / or for pursuing the legitimate interests of i) the owner / Data Subject of the Personal Information; ii) the person processing the Personal Information; or iii) that of a third party to whom the Personal Information is supplied; or
  - is necessary for the proper performance of a public law duty by a public body or on behalf of a public body.

In accordance with the requirements of POPIA, and because your privacy and trust are important to us, we set out below how we, Bidvest Paperplus (Pty) Ltd, our subsidiaries and our affiliates and associated companies (hereinafter referred to as "the Group", "we", "us", or "our") collect, use, and share your

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Personal Information and the reasons why we need to use and process your Personal Information.

## **2 Who we are?**

We are a registered company, Bidvest Paperplus (Pty) Ltd, with registration number 1971/002971/07 and our head office is currently situated at Lithotech House, Hampton Park, 20 Georgian Crescent, Bryanston, Johannesburg.

We are part of the Bidvest Group of companies. Our company's core business solutions, products and services relating to printing, data handling, labelling and packaging are handled by different internal brands and businesses. These may change over time, but currently are:

- Lithotech
- Masterpack
- Sprint Packaging
- Lufil Packaging
- AFC (Aluminum Foil Converters)
- Rotolabel
- Bidvest Mobility
- Bidvest Data
- S&N Labels

## **3 Applicability of this Visitor's Processing Notice**

As part of the Bidvest Group, we adhere to and subscribe to all Bidvest Group Policies, including the Bidvest Group's Data Protection Policy, which can be found here: <https://www.bidvest.co.za/pdf/home/data-protection/bidvest-data-protection-policy.pdf>

This Visitor's Processing Notice is based on the Bidvest Group's Data Protection Policy. If there are any discrepancies with between our Visitor's Processing Notice and the Bidvest Group's Data Protection Policy,

the wording of the latter will prevail.

This Processing Notice applies to you and all persons who come onto any of our premises and sites, including reception and waiting rooms, offices, operational areas and facilities, manufacturing areas, storage areas, warehouses and parking areas (in the Group / any of our premises).

### **Purpose For Processing Your Personal Information**

4

Your personal information will be processed by us for the following purposes:

- to facilitate access into and out of the premises;
- to ascertain who is entering and leaving the premises;
- to monitor movements on or in the premises;
- to ensure a safe working and operating environment;
- to comply with laws, including Security, Health and Safety related laws and legal obligations;
- to manage security services; for the purposes of registering all persons who enter and leave the premises;
- for the purposes of managing and investigating security incidents; including accidents within the premises or attention to emergency evacuations; and
- other security measures in general.

5

### **What Personal Information or Information Do We Collect from You?**

In in order to gain access to the our facilities and offices, we may have to process the following Personal Information, which pertains to you:

- Your or your employer or organization's contact information, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar

contact data, serial numbers of equipment, details regards the possession of dangerous weapons, your status with an organization, your images and certain biometrics such as finger prints and similar data, which are required for various legitimate interests, and / or lawful reasons.

- Specific identifiers, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, certain biometric information which may be required for access control such as finger prints and personal details which we may record in relation to alcohol or drug testing, and health records or related details.
- Children's Information, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the Group / any of our premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around any of our premises which he or she is given access to.

## **6 Sharing And Retaining Your Personal Information**

Your Personal Information may under certain circumstances have to be shared with internal parties and / or third parties for the purposes detailed above.

Your Personal Information will be disposed of within 8 (eight) months of you leaving our premises, save where it may be required for a longer period. In this regard we retain personal information in accordance with our Group records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfil the purposes described in this Privacy Statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.



## 7 Security Of Information

The security of your Personal Information is important to us. Taking into account the nature, scope, context, and purposes of processing personal information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of personal information. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.

Your Personal Information will be stored electronically which information, for operational reasons, will be accessible to persons employed or contracted by us on a need-to-know basis, save that where appropriate, some of your Personal Information may be retained in hard copy.

## 8 Your Rights

You as a Data Subject have certain rights, which are detailed below:

- **The right of access** You may ask us free of charge to confirm that we hold your personal information, or ask us to provide you with details, at a fee, how we have processed your personal information, which can be done by following the process set out under our PAIA Manual.
- **The right to rectification-** you have the right to ask us to update or rectify any inaccurate personal information.
- **The right to erasure (the 'right to be forgotten')** - where any overriding legal basis or legitimate reason to process your Personal Information no longer exists, and the legal retention period has expired, you may request that we delete the personal information.
- **The right to object to and restrict further processing-** where we do not need your consent to process your personal information, but you are not in agreement with such processing, you object to us processing such Personal Information.
- **The right to withdraw consent** - where you have provided us with consent to process your personal information, you have the right to subsequently withdraw your consent.

- **The right to data portability**- you may want your Personal Information to be transferred to another party, which can be done under certain circumstances.

Any such request can be addressed to us using the contact information below.

## 9 **Contact Us**

Any comments, questions or suggestions about this notice or our handling of your Personal Information should be emailed to [popi@bidpaperplus.co.za](mailto:popi@bidpaperplus.co.za). Alternatively, you can contact us at the following postal address or telephone number:

Information Officer: Martines Maartens

Postal: Private Bag X92, Bryanston, 2021

Phone: +27 11 706 6751

## 10 **Changes To This Notice**

As our company changes over time, this Processing Notice may change as well. We reserve the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on our website and in this regard encourage you to visit our website frequently in order to keep abreast with any changes.

## 11 **Complaints**

Should you wish to discuss a complaint, please feel free to contact us using the details provided above.

All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator who can be contacted at <https://www.justice.gov.za/infoereg/>

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## 12 **Acceptance**

By providing us with the Personal Information which we require from you as listed under this Processing Notice:

- You acknowledge that you understand why your Personal Information needs to be processed;
- You accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
- Where consent is required for any processing as reflected in this Processing Notice, you agree, by virtue of you handing us the Personal Information, that we may process this particular Personal Information.

Furthermore you confirm that where you provide us with another person's Personal Information for processing that you have obtained the required permission from such person (s) to provide us with their Personal Information for processing.

This policy was last updated on 28 June 2021.