



**WEBSITE PRIVACY POLICY  
FOR**



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## Content

1	Introduction .....	3
2	Who we are.....	3
3	Applicability of this Privacy Policy.....	4
4	Consent and acceptance .....	4
5	Changes.....	5
6	Your obligations .....	5
7	Definition of Personal Information .....	5
8	Collection of Personal Information .....	6
9	Purpose of collection .....	8
10	Consent to process your Personal Information .....	9
11	Privacy by design.....	9
12	Messages and updates.....	9
13	Targeted content .....	10
14	Disclosure.....	10
15	No selling.....	11
16	Marketing purposes .....	11
17	Employees.....	11
18	Change of ownership .....	11
19	Unauthorised disclosure .....	12
20	Security .....	12
21	Accurate and up to date .....	12
22	Retention .....	12
23	Transfer to another country .....	13
24	Updating or removing.....	13
25	Data breaches .....	13
26	Limitation .....	13
27	Enquiries .....	13

## **1 Introduction**

Welcome to our Website Privacy Policy. 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 Policy 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 Website Privacy Policy 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 Policy 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 Website Privacy Policy and Consent so that you fully understand our approach towards the use of 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 (Aluminium Foil Converters)

- Rotolabel
- Bidvest Mobility
- Bidvest Data
- S&N Labels

### **3 Applicability of this Website Privacy Policy**

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 Website Privacy Policy is based on the Bidvest Group's Data Protection Policy. This Website Privacy Policy also needs to be read together with our External Processing Notice which can be found here: <http://www.bidpaperplus.co.za/images/downloads/BPP%20External%20Processing%20Notice%20V1.1.pdf>

If there are any discrepancies between our Website Privacy Policy and the External Processing Notice, the wording of the latter will prevail.

This policy applies to you if you are:

- a visitor to our website; any of the websites of our related brands and business described above; ("our websites")

### **4 Consent and acceptance**

By submitting your Personal Information to us, through our website or otherwise, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this Policy. By using our web sites or our products and services, you acknowledge that you have reviewed and accepted the terms of this Website Privacy Policy and consent to the use of your Personal Information by us or any of the businesses within our group as set out in this Policy.

If you are not 18 years of age or do not agree with any of the terms in this Policy, you may not use our websites as you do not have the legal capacity to enter into a binding agreement.

By accepting this Policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

## **5 Changes**

We may change the terms of this Policy at any time by updating this web page. While we will endeavor to notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made the onus is on you to check this Policy every time you use our websites to see if you agree to the latest update of this Policy. If you do not agree with the changes, then you must stop using our websites. If you continue to use our websites following any change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

## **6 Your obligations**

You may only send us your own Personal Information or the Personal Information of another data subject where you have their permission to do so.

## **7 Definition of Personal Information**

According to the POPI Act, Personal means Information "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person."

The Personal Information we may process includes:

- certain information that we collect automatically when you visit our website or any of our related websites;
- certain information collected on registration as a customer or supplier;
- certain information when you enter into a commercial agreement with us;  
and
- optional information that you provide to us voluntarily.

Common examples of the types of Personal Information which we may collect and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind;

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- contact information – such as your phone number or email address;
  - address information – such as your physical or postal address;

Depending on the goods or services that you require, we may also collect sensitive Personal Information like your bank account details.

Personal Information excludes:

- 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; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute Personal Information subject to protection under this policy).

## **8 Collection of Personal Information**

We may collect your Personal Information in any number of ways:

### **On registration**

Once you register on our websites, you will no longer be anonymous to us. You will provide us with certain Personal Information.

This Personal Information may include:

- your name and surname;
- your email address;
- your telephone number;
- your company name, company registration number, and VAT number;
- your postal address or street address; and
- your username and password

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We will use this Personal Information to fulfil your account, provide additional services, products and information to you as we reasonably think appropriate, and for any other purpose set out in this policy.

### **From browser**

We may automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information).

Please note that other websites visited before entering our website might place Personal Information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some Personal Information.

### **Cookies**

We may place small text files called 'cookies' on your device when you visit our websites. These files do not contain Personal Information, but they do contain a personal identifier allowing us to associate your Personal Information with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences
- improving how our website performs
- allowing third parties to provide services to our website and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are

necessary. Many websites use cookies and you can find out more about them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Third party cookies**

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

### **Web beacons**

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your Personal Information. We merely use them to compile anonymous information about our website.

### **Optional details**

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage or promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

## **9 Purpose of collection**

We may use or process any goods information, services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

Processing includes gathering your Personal Information, disclosing it, and combining it with other Personal Information. We generally collect and process your Personal Information for various purposes, including:

- goods purposes – such as collecting orders for, supplying, and supporting our goods



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- services purposes – such as providing our services
  - marketing purposes – such as pursuing lawful related marketing activities
  - business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions and
  - legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website
- monitor website usage metrics such as total number of visitors and pages accessed and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

## **10 Consent to process your Personal Information**

You consent to your Personal Information, being processed by us:

- in accordance with applicable law
- when you provide us with any information or optional information as set out above.

## **11 Privacy by design**

When we decide to develop a new product or start a new activity that involves the processing of Personal Information, we take the privacy and data protection laws and principles into account and try to build them into the product or activity.

## **12 Messages and updates**

We may send administrative messages and email updates to you about our service. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

### **13 Targeted content**

While you are logged into the website, we may display targeted adverts and other relevant information based on your Personal Information. In a completely automated process, computers process the Personal Information and match it to adverts or related information. We never share Personal Information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any Personal Information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send Personal Information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your Personal Information.

### **14 Disclosure**

We may share your Personal Information with:

- other divisions or companies within the Bidvest Paperplus stable and also the Bidvest Group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services)
- an affiliate, in which case we will seek to require the affiliates to honour this Website Privacy Policy
- our goods suppliers or service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit)
- credit bureaus to report account information, as permitted by law
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria) and

other third parties who provide us with relevant services where appropriate.

We may disclose your Personal Information as required by law or governmental audit. We may disclose Personal Information if required:

- by a subpoena or court order
- to comply with any law
- to protect the safety of any individual or the general public and
- to prevent violation of our terms of service.

## **15 No selling**

We will not sell Personal Information. No Personal Information will be disclosed to anyone except as provided in this Website Privacy Policy.

## **16 Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the Personal Information to advertisers or business partners.

## **17 Employees**

We may need to disclose Personal Information to our employees that require the Personal Information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel. Any of our employees or personnel that handle your Personal Information will have signed non-disclosure and confidentiality agreements.

## **18 Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the Personal Information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your Personal Information migrating to a new owner, you may request us to delete your Personal Information.

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**19            Unauthorized disclosure**

We cannot accept any liability whatsoever for unauthorised or unlawful disclosure of your Personal Information by third parties who are not subject to our control.

**20            Security**

We take the security of Personal Information very seriously and always do our best to comply with applicable data protection laws. We will implement and maintain appropriate technical and organisational measures to protect the security and confidentiality of the Personal Information. We host on a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. All Personal Information is securely stored in our customer database. We authorize access to Personal Information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

**21            Accurate and up to date**

We will try to keep the Personal Information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. Please note that in order to better protect you and safeguard your Personal Information, we may take steps to verify your identity before granting you access to your account or making any corrections to your Personal Information. Throughout your interaction with us you retain the right to rectify Personal Information that is incorrect or inaccurate. This does not apply if we process your Personal Information in our capacity as a processor on behalf of you or the Administrator when you or the Administrator act as the data controller.

**22            Retention**

We will only retain your Personal Information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your Personal Information.

We may retain your Personal Information in physical or electronic records at our discretion.

### **23 Transfer to another country**

We may transmit or transfer Personal Information outside of the country in which it was collected to a foreign country and process it in that country. Personal Information may be stored on servers located outside the country in which it was collected. You consent to us processing your Personal Information in a foreign country whose laws regarding processing of Personal Information may be less stringent.

### **24 Updating or removing**

You may choose to correct or update the Personal Information you have submitted to us by contacting us via email at [popi@bidpaperplus.co.za](mailto:popi@bidpaperplus.co.za).

You are entitled to a right to be forgotten. We will delete any Personal Information that you don't want us to have, subject to our rights or obligations to retain your Personal Information in terms of any legal requirement.

### **25 Data breaches**

We will notify our customers of any confirmed data breaches that has occurred. It is our customers' responsibility to notify relevant supervisory authority and any affected data subjects of the data breach.

### **26 Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

### **27 Enquiries**

If you have any questions or concerns arising from this Website Privacy Policy, please contact us via email at [popi@bidpaperplus.co.za](mailto:popi@bidpaperplus.co.za).

This policy was last updated on 28 June 2021.