

# SLG GROUP PRIVACY POLICY

## INTRODUCTION

We, as SLG Group (“we”, or “us”, or “our”), namely SLG (Pty) Ltd and SLCNG (Pty) Ltd respect your privacy and are committed to the protection of your personal data. 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.

This Policy applies to:

- a) All data subjects (persons, whether a natural or juristic person to whom personal data relates (“you”, “your”)
- b) a visitor to our website; or
- c) engagement with us telephonically, in person or via email; or
- d) a customer who has requested the services that we provide from our Sales and Marketing team or via our online platforms, whose personal data we collect.

## DEFINITIONS

For the purposes of this policy:

**Cookies** are small files that a website places on your computer, mobile or any other device. One of their many functions is to keep details of your browsing history allowing a website to track usage behaviour and compile aggregate data that will allow the website operator to improve the functionality of the website and its content.

**Device** means any device that can access this website, such as a computer, a cell phone or a digital tablet.

**Personal data** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal preferences of the person;
- Correspondence sent by the person that would reveal the contents of the original correspondence;
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

**Service Provider** means any natural or legal person who processes data on behalf of SLG Group, third party companies or individuals employed by SLG Group to facilitate this website or perform services related to this website, or to assist SLG Group in analysing how this website is used.

**Third Party Social Media Service** refers to any website or any social network website through which a user can log in or create an account to use this website.

**Usage Data** refers to data collected automatically, either generated using this website, or from the website infrastructure itself (for example, the duration of a page visit).

**You** means the individual accessing or using this website, or the company, or other legal entity on behalf of which such individual is accessing or using this website, as applicable.

## 1. CATEGORIES OF PERSONAL DATA COLLECTED

1.1. The types of data which may be requested, collected, stored and/or used may include the following:

- Personally identifiable information such as your name, email address, contact number, home or work address, company details;
  - Financial information such as banking details;
  - Screening information and CCTV monitoring in relation to on-site and head office visits;
  - Contractual information for processes such as compilation of service agreements, employment and marketing purposes.
  - Technical and usage data collected automatically when using our website.
- Usage data may include information such as your device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of this website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access this website by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile internet browser you use, unique device identifiers and other diagnostic data.

Our website makes use of cookies to automatically collect information and data through the standard operation of the internet servers. The type of information collected by cookies is not used to personally identify you. If you do not want information collected using cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on this website, and thus if you disable the cookies on your browser; you may not be able to use those features, and your access to this website will therefore be limited. If you do accept

a cookie, you thereby consent to our use of any personal information collected by us using that cookie.

- Information from third-party social media services when opting to browse via the following services such as our website, Google, Facebook, Twitter and LinkedIn.
- 1.2. You may choose to provide personal information to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity, or falsely state or otherwise misrepresent your affiliation with anyone or anything.
  - 1.3. You may also have the option of sharing additional information with SLG Group through your third-party social media service's account, your activities or your contact list associated with that account. If you choose to provide such information and personal data, you are giving SLG Group permission to use, share and store it in a manner consistent with this policy.
  - 1.4. Should your personal data change, please inform us and provide us with updates of the information as soon as reasonably possible to enable us to keep your personal information updated.

## **2. REASONS FOR COLLECTION OF PERSONAL DATA**

We respect your privacy and take all reasonable measures to protect your personal data and ensure it is used only when duly required to do so.

Subject to clause 3 below, we will not, without your express consent, use your personal data for any purpose other than as set out below:

- 2.1. Legal or contractual obligations, to achieve business related interests;
- 2.2. Agreed upon administrative purposes such as compilation of service agreements, recruitment and employment purposes and marketing;
- 2.3. To contact you regarding services offered by us or any of our divisions, affiliates and/or partners;
- 2.4. To enhance the use and functionality of our website and social media applications;
- 2.5. Screening and monitoring purposes for on-site visits; and
- 2.6. Compliance with applicable laws;

## **3. DISCLOSURE AND SHARING OF PERSONAL DATA**

We will not disclose your personal data to any third-party other than as set out below:

- 3.1. To our employees (HR, Marketing, Sales and Finance and Corporate Services) and/or third-party service providers who assist us to interact with you via this website, email or

any other method, for the rendering of services or administrative purposes, and thus need to know your personal information in order to assist us efficiently.

- 3.2. We will ensure that all of our employees, third party service providers, divisions, affiliates and partners (including their employees and third-party service providers) that have access to your personal information are bound by appropriate and legally binding confidentiality and non-use obligations (save as permitted herein) in relation to your personal information.
- 3.3. We are entitled to use or disclose your personal data if such use or disclosure is required in order to comply with any applicable law, order of court or legal process served on us, or to protect and defend our rights or property.
- 3.4. SLG Group may **not transfer personal information** about a data subject **to a third party who is in a foreign country unless** the personal information that is collected automatically is collected by third parties whose technology, we use to provide website functionality and acquire website analytics information. Some of these third parties will be outside of the borders of South Africa and data subject's information will be stored outside the borders of South Africa. We make use of a Google Business Account and the information collected through this third party will be kept on the servers used by Google.
- 3.5. If you disclose your personal data to a third party, such as an entity that operates a website linked to this website or anyone other than SLG Group, WE SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY. This is because we do not regulate or control how that third party uses your personal information.

#### **4. SECURING AND RETENTION OF PERSONAL DATA**

We will secure the integrity of all personal information that is in our possession and control by:

- 4.1. Treating your personal information as strictly confidential.
- 4.2. Taking appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access.
- 4.3. We may retain your personal information in physical or electronic records at our discretion.
- 4.4. Our hosting company hosts this website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.
- 4.5. Provide you with access to your personal information to view and/or update personal details;

- 4.6. Promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
- 4.7. Provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable notice and request;
- 4.8. 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.
- 4.9. During the period of retention, we will abide by our non-disclosure obligations and will not share or sell your personal information to any third-party other than as provided for in this policy, unless we are compelled to do so by law. In particular, in the event of fraudulent activities, SLG Group reserves the right to disclose relevant personal information for criminal investigation purposes, or in line with any other legal obligation for disclosure of the personal information which may be required of it.
- 4.10. Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence. SLG Group may not be held responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## **5. UPDATING OR REMOVING OF PERSONAL DATA**

- 5.1. You may choose to adjust or update the personal information you have submitted to us, by contacting us by phone or email.
- 5.2. Upon your request, SLG Group may promptly return or destroy any and all of your personal information in our possession or control if deemed necessary to do so.

## **6. YOUR RIGHTS**

The following rights are applicable to you in respect of the personal data we process.

- 6.1. Confirmation whether the company holds your personal information;
- 6.2. How the information is secured;
- 6.3. Access to your personal information;
- 6.4. Where necessary, request the correction or deletion of the personal information; and

## 6.5. Confirmation of what action was taken in response to your request.

Please be advised that the rights listed above are not absolute and SLG Group may be entitled to refuse requests where legal obligations apply.

## 7. CHANGES TO TERMS OF THE PRIVACY POLICY

We may change the terms of this Policy at any time by updating this webpage. We will notify you of any changes by placing a notice in a prominent place on this website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated.

If you continue to use this website or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted the amendments to the Policy.

## 8. ACCEPTANCE

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

## 9. DISPUTES AND ENQUIRIES

If you have any questions or concerns arising from this Privacy Policy, or about your personal information, please contact the Information Officer. This can be done in writing by submitting an email to [info@slgas.co.za](mailto:info@slgas.co.za).

We will review the above-mentioned and try to resolve any complaints or enquiries relating to the protection of your personal data, in this Policy and applicable law.

In our quest to adhere to the applicable laws as provided in this Policy, the rights mentioned are not absolute and do not always apply. Exemptions may be applicable and additional information may be required in assessing your requests.

If you believe that our data processing does not meet the legal requirements, or we did not facilitate the exercise of your rights accordingly. You can file a claim with the supervisory authorities by contacting your local Information Regulator. The details are accessible on the internet or by requesting them from the SLG Group Information Officer or Deputy Information Officers.

SLG Group head office is located at:  
89 Richefond Circle  
Ridgeside Office Park  
Umhlanga  
4319