

<b>DOCUMENT NAME: POPI POLICY</b>	
<b>DOCUMENT TYPE: WEBSITE PRIVACY POLICY</b>	

## 1. INTRODUCTION

**Southern Steel CC** services, including (without limitation) our website and other interactive properties through which the services are delivered (collectively, the “Service”) are owned, operated and distributed by the (referred to in this Privacy Notice as “the Company” or “we” and through similar words such as “us,” “our,” etc.). This Privacy Notice outlines the personal information that the Company may collect, how we use and safeguard that information, and with whom we may share it.

The Company encourages our customers, visitors, business associates, and other interested parties to read this Privacy Notice, which applies to all users. By using our Service or submitting personal information to us by any other means, you acknowledge that you understand and agree to be bound by this Privacy Notice, and agree that we may collect, process, transfer, use, and disclose your personal information as described in this Notice.

Further, by accessing any part of the Service, you are agreeing to THE TERMS AND CONDITIONS OF OUR TERMS OF SERVICE (the “Terms of Service”). IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE OR OUR TERMS OF SERVICE, PLEASE DO NOT USE ANY OF THE SERVICES.

## 2. POLICY AND PROCEDURE

### 2.1 What personal information do we collect about you?

Personal information (also commonly known PI or personal data) is information that can be used to identify you, or any other individual to whom the information may relate.

The personal information that we collect directly from those registering for the Service, includes the following categories:

- Name and contact information (e.g., address; phone number; email, fax).
- Payment Information (e.g., credit card details, bank account details, etc.)
- Order Information (e.g., current order/purchase information, purchase history, shipping details).
- Company/employer information.
- Geographic or location information.
- Information contained in posts you may comment on the public forums and interactive features of the Service.
- Other information that may be exchanged in the course of engaging with our Services. You will be aware of any subsequently collected information because it will come directly from you and will only be processed with your consent.

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## 2.2 Collection of User Generated Content

- We may invite you to post content on the Service, including your comments and any other information that you would like to be available on the Service, which may become public (“User Generated Content”).
- If you post User Generated Content, all of the information that you post will be available to authorised personnel of the Company.
- You expressly acknowledge and agree that we may access in real-time, record and store archives of any User Generated Content on our servers to make use of them in connection with the Service. If you submit a review, recommendation, endorsement, or other User Generated Content through the Service, or through other websites including Facebook, Instagram, Google, and other similar channels, we may share that review, recommendation, endorsement or content publicly on the Service.

## 2.3 What are the sources of personal information collected by the Company?

- When providing personal information to the Company as described in this Notice, that personal information is collected directly from you, and you will know the precise personal information being collected by us.
- The Company does not collect personal information from any other sources, except where it may automatically be collected as described in the section titled “Cookies, Device Data, and How it is Used, if the information in that section is considered personal information.

## 2.4 Why does the Company collect your personal information?

- Subject to the terms of this Privacy Notice, the Company uses the above-described categories of personal information in several ways.
- Unless otherwise stated specifically, the above information may be used for any of the following purposes:
  - to administer the Service to you.
  - to respond to your requests.
  - to distribute communications relevant to your use of the Service, such as system updates or information about your use of the Service.
  - as may be necessary to support the business operation, such as account maintenance, and record-keeping purposes.
  - to send to you our solicitations, product announcements, and the like that we feel may be of interest to you. Please note that you may “opt out” of receiving these marketing materials.

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- in other manners after subsequent notice is provided to you and/or your consent is obtained, if necessary.

## 2.5 How do we share your Personal Information with third parties?

- Personal information will only be shared with third parties with your written consent, or where legislation prescribe for us to do so.
- If you have agreed to this in writing, we may provide any of the described categories of personal information to the Company's employees, consultants, affiliates or other businesses or persons for the purpose of processing such information on our behalf in order to provide the Service to you. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Notice, as well as the Third-Party Agreement in line with the POPI Act.
- We will not share your personal information with other, third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature which you will specifically be able to opt-out of.
- In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) to enforce any provision of the Terms of Service , protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare; (iii) when disclosure is required to maintain the security and integrity of the Service, or to protect any user's security or the security of other persons, consistent with applicable laws (iv) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (v) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

## 2.6 Direct Marketing Communications

- We may communicate with you using email, SMS, and other channels (sometimes through automated means) as part of our effort to market our products or services, administer or improve our products or services, or for other reasons stated in this Privacy Notice. You have an opportunity to withdraw consent to receive such direct marketing communications, as permitted by the POPI Act.
- If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by submitting a request, or by using the UNSUBSCRIBE link in any email communication you may have received.
- Further, you may express your communication preferences by:

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- Noting your preferences at the time you register your account with the Site [or our mobile application].
  - Logging into your account settings and updating your preferences.
  - Contacting us using the contact information provided below.
- Please note that you may continue to receive non-marketing communications as may be required to maintain your relationship with the Company.
  - In addition to the communication described here, you may receive third-party marketing communications from providers we have engaged to market or promote our products and services. These third-party providers may be using communications lists they have acquired on their own, and you may have opted-in to those lists through other channels. If you no longer wish to receive emails, SMSs, or other communications from such third parties, you may need to contact that third party directly.

## 2.7 Retention of Data

- The Company will retain your personal information only for as long as is necessary for the purposes set out in this Notice. We will retain and use personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.
- The Company will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Sites and/or Portals, or we are legally obligated to retain this data for longer periods.

## 2.8 Cookies, Device Data, and How it is Used.

- When you use our Service, we may record unique identifiers associated with your device (such as the device ID and IP address), your activity within the Service, and your network location.
- The Company uses aggregated information (such as anonymous user usage information, cookies, IP addresses, browser type, clickstream information, etc.) to improve the quality and design of the Service and to create new features, promotions, functionality, and services by storing, tracking, and analysing user preferences and trends.
- Specifically, we may automatically collect the following information about your use of Service through cookies, web beacons, and other technologies:
  - domain name

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- browser type and operating system
  - web pages you view.
  - links you click.
  - IP address
  - the length of time you visit the Sites, Portals, and/or Services.
  - the referring URL or the webpage that led you to the Sites.
- We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party service providers may do so on behalf of us).
  - In addition, we may use "cookies," clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Service, and the portion of the Service you choose to use.
  - A cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site.
  - Your browser has options to accept, reject or provide you with notice when a cookie is sent. The cookies on our site do not execute any code or virus; and **they do not contain any personal information**. Cookies allow the Company to serve you better and more efficiently, and to personalise your experience with the Service.
  - We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Service, and to deliver content (which may include third party advertisements) specific to your interests.
  - We may use third party service providers to help us analyse certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyse visitor activity on the site. We may permit these service providers to use cookies and other technologies to perform these services for the Company. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice and the Regulations as set out in the POPI At.

## 2.9 International Data Transfer

- We may use third party service providers to help us deliver certain services, and it may result in the processing of personal information in data centers and locations outside of South Africa. For example, these service providers may provide us with essential information technology or tools we use to run our business.

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- We may permit these service providers to process our business information and/or your personal information. We do not permit these service providers to process any personal information outside of a contract, and these service providers may collect personal information on our behalf.
- Our third-party service providers are required to comply fully with this Privacy Notice as well and the Regulations as set out in the POPI Act.

## 2.10 Privacy Rights

- South African law may provide you with certain rights with regard to your personal information under the Protection of Personal Information Act (“POPIA”) and Promotion of Access to Information Act (“PAIA”), as well the Consumer Protection Act.
- Throughout this Privacy Notice you will find information required by POPIA regarding the categories of personal information collected from you; the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of the Notice and is applicable in the 12 months preceding the effective date of the Notice.
- As a South African resident, the POPIA and PAIA provide you the ability to make inquiries regarding to your personal information.
- Specifically, the degree to which the information is not already provided in this Privacy Notice, you have the right to request disclosure or action your personal information, including:
  - If your personal information is collected by us.
  - The specific pieces of personal information collected about you.
  - The ability to correct or delete certain personal information collected about you.
  - The ability to delete all the personal information collected about you, subject to certain exceptions.
  - To opt-in or opt-out of direct marketing to you.
  - To object to processing of your personal information, or
  - Appeal any rejection of access to your personal information.
- You may submit a request regarding your rights under POPIA or PAIA by submitting a request through to our Information Officer: **Karl Bense**, on the prescribed form.
- If we receive a request from you, we will first make a determination regarding the applicability of the law, and we will then take steps to verify your identity prior to responding. The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information

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submitted in the request with information already held by the Company and/or contacting you through previously used channels to confirm that you submitted the request (i.e. confirming identity through contact information that we have on file, and/or the contact information submitted to make the request).

- The Company does not knowingly collect or process the special personal information such as your religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, health or sex life, or your criminal behaviour or biometric information.
- If you have a comment, question, or complaint about how we are processing your personal information, we hope that you contact us in order to allow us to resolve the matter. In addition, if you are located in the Republic of South Africa, you may submit a complaint regarding the processing of your personal information to the Information Regulator at the following link: <https://www.justice.gov.za/inforeg/contact.html>.

### 2.11 Third Party Advertisers

- We may allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Service.
- These third-party ad servers or ad networks use technology to send, directly to your device, the advertisements and links that appear on the Service.
- They automatically receive your device ID and IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalise the advertising content you see.
- You should consult the respective privacy policies of these third-party ad servers or ad networks for more information on their practices and for instructions on how to opt-out of certain practices. This Privacy Notice does not apply to them, and we cannot control their activities.

### 2.12 Information Storage and Security

- We employ industry-standard and/or generally accepted security measures designed to secure the integrity and confidentiality of all information submitted through the Service. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed.
- We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.
- Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or

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secure areas of the Service.

- In order to protect you and your information, we may suspend your use of any of the Service, without notice, pending an investigation, if any breach of security is suspected.

### 2.13 External Links

- The Service may contain links to other websites maintained by third parties. Please be aware that we exercise no control over linked sites and the is not responsible for the privacy practices or the content of such sites.
- Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.
- You hereby acknowledge and agree that the Company is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party sites, and you hereby release the Company from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

### 2.14 Changes to this Privacy Notice

- The Company reserves the right to modify this Privacy Notice from time to time in order to ensure that it accurately reflects the regulatory environment and our data collection principles.
- When material changes are made to this Privacy Notice, the Company will post the revised Notice on our website.

### 2.15 Contact Us.

If you have any questions or comments about this Privacy Notice or the Service provided by **Southern Steel CC**, please contact us at:

P.O. Box 1634  
 Manaba Beach  
 4276

Tel: 039 312 0898

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