

## PRIVACY NOTICE

### Definitions:

"We" and "Us" shall mean:	Sublimation House Pty (Ltd)
"POPIA" shall mean:	the Protection of Personal Information Act 4 of 2013;
"You" and "Your" shall mean:	The "Data Subject", the person to whom personal information relates;
"Personal" Information shall mean:	personal information as defined in POPIA

### .Purpose:

We are committed to respecting concerns regarding privacy and will process all personal information in alignment with the prescripts of **POPIA** and any further prevailing legislation.

All personal information furnished collected, whether voluntarily or mandatory, and processed by us regardless of form or medium shall be processed in accordance with the provisions set out hereunder.

### Collecting Personal Information:

We currently collect and process the following information:

#### Natural Persons:

Names, address, contact details,

#### Juristic Persons:

Name, company registration number, VAT registration number, contact details and address.

We process information which has been collected directly from you and is required in order to provide a holistic service. Your omission to furnish any pertinent information could impede our ability to do so.

In accordance with the provisions of the POPIA, we will your process personal information:

1. for the purposes for which it was provided;



2. in order to carry out actions for the conclusion or performance of a contract to which you are a party;
3. in order to comply with **obligations** imposed by law on the business;
4. where the processing protects your **legitimate** interests;
5. where the processing is necessary for the proper performance of a **public law** duty by the business; or
6. where the processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

#### **Processing of Information:**

We will share your personal information:

1. in order to comply with applicable law or with legal process served on us;
2. in order to protect and defend our rights or property;
3. with employees and/or third parties who assist us in providing services to you and thus require your personal information. We will ensure that all such employees and third party service providers, having access to your personal information comply with POPIA or equivalent legislation; and
4. with third parties if you have specifically requested us to do so.

#### **Security Measures:**

We will endeavour to:

1. treat your personal information as strictly confidential;
2. take 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;
3. promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information; and
4. provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request.

#### **Retention:**

We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

#### **Selling Personal Information:**

We do not sell the information and will only share same with persons as set out herein.

#### **Transborder Flow of Information:**



We may transfer your information outside South African borders for retention purposes and/or if our service provider/s are cross border or uses cross boarder systems. We will only share your information with service providers who have comparable privacy policies in place.

By entering into this agreement, you consent to the transfer of such information to them.

#### **Your rights:**

You have the right at any time to:

1. access your personal data by sending a written request to our Information Officer who's contact details are set out below.
2. request us to correct or supplement any of your personal data which we will undertake as soon as practicable.
3. request the return or destruction of personal information. We will consider your request in light of any other laws or regulations prohibiting us from destroying your personal data; and
4. lodge a complaint with us.

In order to comply with any request received, we may require proof of identity.

#### **Changes:**

We may update this privacy notice from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

#### **Promotion of Access to Information Act:**

In compliance with the provisions of the *Promotion of Access to Information 2 of 2002 (PAIA)*, a copy of our manual is available via email request submitted to [info@subhouse.co.za](mailto:info@subhouse.co.za)

#### **Contact:**

For more information about our privacy practices, if you have questions, or if you would like to lodge a complaint, please contact **Con Oosthuizen at 082 676 5747**

If you are not satisfied with our response to your query, you may approach the following regulatory body for further assistance:

**THE INFORMATION REGULATOR (SOUTH AFRICA) SITUATE AT: JD HOUSE, 27 STIEMENS STREET, BRAAMFONTEIN, JOHANNESBURG, 2001.**

COMPLAINTS: [POPIAComplaints@infoeregulator.org.za](mailto:POPIAComplaints@infoeregulator.org.za)/ [PAIAComplaints@infoeregulator.org.za](mailto:PAIAComplaints@infoeregulator.org.za)

GENERAL QUERIES: [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)

