

BEKA SCHRÉDER PRIVACY NOTICE

1. PURPOSE AND SCOPE

At BEKA Schröder (“**Schröder**” or “**we**” or “**us**”), we are committed to protecting your privacy and we value the relationship with our business partners, customers and any party interested in our business.

This Privacy Notice (the “**Notice**”) outlines the types of information, including Personal Information (“**Information**” or “**Personal Information**”), we collect about our business partners, our customers and our Websites and Customer Portal users, how they are used and otherwise Processed, to whom we may disclose them as well as your rights in relation to your Information.

This Notice applies only to BEKA Schröder website: <https://za.schreder.com/> .

For ease of reference, all capitalized terms that are not defined in the body of this Notice are defined in section 12 below.

2. WHO IS RESPONSIBLE FOR YOUR INFORMATION?

BEKA Schröder has its registered office at 13 West View Road - PO Box 120, Olifantsfontein 1665, South Africa and is part of the Schröder Group with headquarters in Belgium, at Rue de Lusambo 67, 1190 Brussels. BEKA Schröder will be responsible in respect of Information we collect about you and will be referred to as Responsible Party. In particular circumstances, such as cross-border matters, Schröder SA and BEKA Schröder will be jointly responsible for your Information and will collaborate, to the extent necessary, to comply with our obligations under Applicable Laws.

3. INFORMATION COLLECTED BY US

Schröder collects Information that are voluntarily provided by you or collected by automated means as outlined below.

Information we collect about our business partners and customers in relation to the supply of our products and services is primarily company data and business information.

- a) **Information provided by you** – If you choose not to provide us with your Information, we may be unable to supply you with our product or services. You may still visit most of our Website’s content, but you may be unable to access certain options, offers and services and we may be unable to register you and provide you access to our Customer Portal.

Types of Information you may be asked and thus choose to provide:

- Name and surname
- E-mail address
- Business mailing address
- Telephone number
- Postal Code
- Company
- Position
- In relation to our Customer Portal, your log-in information (username and password)
- Bank account details and financial information necessary for us to make and receive payments

BEKA Schröder (Pty) Ltd

b) Information provided to us by automated means – Schröder also collects certain Information automatically when you visit our Websites and Customer Portal, such as:

- IP addresses and domain names
- Browser and platform type
- History of pages viewed on our Websites
- Should you consent, your location when visiting our Customer Portal
- Your language and cookies preferences

c) Information we collect from our registered customers – To the extent that you have “opt-in” to our newsletters, Schröder will also collect usage data such as who opened the email sent by us and who clicked on the hyperlinks. You can always “opt-out” of such communications if you would prefer not to receive them in the future by using the “unsubscribe” facility provided in the communication itself.

For more information on the cookies we use on our Websites and Customer Portal, please read our Cookies Notice available at the bottom of our Websites and Portal.

4. HOW WE USE THE INFORMATION WE COLLECT

a) Purposes of Processing – We use Information we collect for the following purposes:

- To administrate our Websites
- To communicate with you and to respond to questions that you have asked through our contact page
- To measure the performance of our email campaigns and to improve our offerings
- To prepare, conclude and execute contracts with you
- For credit collection and accounting
- For sales order and customer relationships management
- To communicate, at our discretion, changes to this Notice
- To send you information that you have asked (by signing up to our newsletters)
- To improve continuously our products and services
- To customize the content of our Websites and Customer Portal and deliver a better experience to you
- To analyze trends and statistics
- To activate and manage the online accounts for which you have registered

b) Legal basis of Processing – Schröder may Process your Information on various legal basis such as:

- Preparing and entering into a contract with you; and/or
- Necessary for the establishment, exercise of defense of legal claims; and/or
- Complying with our legal or statutory obligation(s), such as anti-money laundering and fraud prevention regulations; and/or
- Your consent, as the case may be; and/or
- Our legitimate interest as outlined above.

c) Should you provide us with Information **related to a Third Party**, you confirm that you have a legal basis to do so (consent or another lawful basis, as the case may be) to share such Information with us and that you have made the information in this Notice available to the Third Party.

5. HOW WE MAY SHARE THE INFORMATION WE COLLECT

We will not share, sell, license, trade or rent your Information to or with any Third Party (except as stated below) without your prior consent.

We will only share Information as follows:

- a) **Affiliates:** We share Information within the Affiliated companies of the Schröder Group in order to respond to your requests or inquiries, as part of a corporate transaction, for reporting purposes or where they handle information on our behalf.
- b) **Law enforcement purposes:** We disclose Information if requested or required by government authorities (such as law enforcement authorities, courts, and/or regulators) or otherwise to comply with a legal obligation. In addition, we also disclose Information collected in order to exercise or protect legal rights or defense against legal claims.
- c) **Our Third-Party service providers, agents and distributors ("service providers"):** We share Information with our services providers who provide services to us or on our behalf. These service providers are contractually prohibited from using your Information for any purpose other than to provide their assistance, from sharing Information we disclosed to them and are required to protect your Information.
- d) **Transfer of Information outside of South Africa:** We may transfer Information to certain Affiliates of the Schröder Group located outside of South Africa. Transfer to other third parties outside of South Africa will take place using a data transfer mechanism in accordance with Applicable Laws.
- e) **Fraud prevention:** We disclose Information when disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of our users, others and/or us.

6. HOW WE PROTECT COLLECTED INFORMATION

We use appropriate technical and organizational measures to protect your Information against unauthorized or unlawful Processing and against accidental loss, destruction or damage. We also limit access to your Information to employees who reasonably need access to it to provide products or services to you.

7. HOW LONG WE RETAIN INFORMATION

We will retain Information we collect for as long as necessary to perform the purposes outlined above or to comply with a legal obligation, or for the establishment, exercise or defense of a legal claim in accordance with Applicable Laws. Once Information is no longer necessary, we will securely delete them.

8. YOUR RIGHTS

Applicable Laws provide certain rights to you. Those rights may vary depending on your location and are subject to various conditions under Applicable Laws. In certain cases, the exercise of your rights may make it impossible for us to achieve the purposes identified at section 4.

Should you want to assert your rights, please see **section 10 below**.

We will do our best to provide you with the requested information within the legal deadline. However, if access cannot be provided within a reasonable time frame, we will provide you with an explanation and a date when the information will be provided. If for some reason access is denied, we will provide you with an explanation as to why access has been denied.

Where Applicable Laws so provide, the following rights apply to you:

- a) **Access:** You have the right to obtain confirmation whether we Process your Information and to obtain a copy of Information;
- b) **Rectification and deletion:** You have the right to request the rectification of any inaccurate Information and to have incomplete Information completed. You also have the right to request deletion of your Information;
- c) **Objection:** You have the right to object to the Processing of your Information, including for direct marketing purposes;
- d) **Right to lodge a complaint:** You also have the right to lodge a complaint with the Regulator and before the competent courts;
- e) **Right to refuse or withdraw consent:** In case we ask your consent, you are free to refuse to give such consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any Processing of your Information that occurred prior to the withdrawal of your consent will not be affected;
- f) **Opt-out:** You can always 'opt-out' of any communications should you prefer not to receive them in the future by using the "unsubscribe" facility provided in the communication itself.

9. CHILDREN INFORMATION

The products and services provided on our Websites and Portal are not intended for users under the age of 18. We do not knowingly collect any Information from children under the age of 18. If we become aware that a person submitting information is under 18, we will attempt to delete the information as soon as possible.

Our Websites and Portal users hereby represent that they are at least 18 or at an age to provide valid consent in their country.

10. CONTACT

For any right you would like to exercise or for any question you might have about the way we Process your Information, please contact us at win@Schröder.com.

BEKA Schröder's Information Officer's contact details are the following:

Daniel Kasper – d.kasper@beka-schreder.co.za

11. AMENDMENTS TO THIS NOTICE

We may update this Notice from time to time in accordance with legal requirements and/or any changes to our Information management practices. When required, we will notify you about such change. A copy of the latest version of this Notice will always be available on this page.

12. DEFINITIONS

- **Affiliates:** refers to Schröder S.A. affiliates, which are entities under common ownership or control of Schröder S.A. with registered office at Rue de Lusambo, 67, 1190 Brussels, Belgium.
- **Applicable Laws:** means any applicable personal information protection and privacy laws such as PAIA and POPIA.
- **Responsible Party:** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.
- **Customer Portal:** Schröder Customer Portal (<https://portal.Schröder.com>).
- **PAIA:** means the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

- **POPIA:** means the Protection of Personal Information Act 4 of 2013.
- **Information:** any type of information about you, including Personal information.
- **Personal information:** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Examples include but are not limited to: (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person.
- **Processing or Processed or Process:** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;
- **Regulator:** refers to the Information Regulator of South Africa, the national public authority that is competent for ensuring protection of your Personal Information and effective access to information.
- **Third Party or Third Parties:** means a natural or legal person, public authority, agency or body other than the data subject, responsible party, operator and persons who, under the direct authority of the responsible party or operator, are authorized to process personal information.