



## **SPIER HOLDINGS PRIVACY POLICY**

### **Introduction**

Welcome to our privacy policy. This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal data 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 data).

This policy is applicable to all visitors to our website.

### **Personal Information**

Your personal information is collected when:

- you submit any enquiry;
- create an account login;
- transact online;
- complete an application form or registration form;
- when you enter a Spier promotion or competition (including via our websites or through social media sites);
- when you register to use one of our websites or when you participate in blog discussions or other social media functions on our websites.

The information you provide includes:

- your name and surname;
- your age;
- your email address;
- your telephone number;
- your company name, company registration number, and VAT number;
- your financial and card payment details
- your postal address or street address; and
- your username and password.

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

### **When visiting our website**

When visiting our website, and no online transaction is initiated, enquiry is submitted or an application form is completed and submitted, no personal information is collected, however, we 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 data 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 data.

### **Consent**

Consent is required when collecting your personal information, therefore by voluntarily submitting personal information on our website, you are consenting to the collection and processing of your information only for the purposes for which it is provided to us.

### **Legal capacity**

You may not access our website to order our goods or services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

### **Deemed acceptance**

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

### **Your obligations**

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

### **Changes**

We may change the terms of this policy at any time by updating this web page. We will 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 and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website, and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.



## **Cookies**

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal data, but they do contain a personal identifier allowing us to associate your personal data with a certain device. These files serve several 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).

## **Processing**

Processing includes gathering your personal data, disclosing it, and combining it with other personal data.

## **Consent to collection**

We will obtain your consent to collect personal data in accordance with applicable law, and when you provide us with any registration information or optional information.

## **Our obligations**

We may use your personal data to fulfil our obligations to you.

## **Regulators**

We may disclose your personal data as required by law or governmental audit.

## **Law enforcement**

We may disclose personal data 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.

### **No selling**

We will not sell personal data. No personal data will be disclosed to anyone except as provided in this privacy policy.

### **Employees**

We may need to disclose personal data to our employees that require the personal data 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 data will have signed non-disclosure and confidentiality agreements.

### **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 data we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal data migrating to a new owner, you may request us to delete your personal data.

### **Unauthorised disclosure**

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

### **Information posted by you online**

If you post information on one of our websites (such as the blog), it will generally be accessible to others. We do not recommend you post personal information on public areas of our websites. Such personal information is not covered by this policy.

### **POPI Manual**

Our POPI Manual is accessible from our Information Officer.

### **PAIA Manual**

Our PAIA Manual can be accessed on our website.

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