

GREENLANDS CAPITAL PARTNERS (PTY) LTD  
PRIVACY POLICY

## GREENLANDS CAPITAL PARTNERS PRIVACY POLICY

Welcome to the GCP Privacy Policy. Greenlands Capital Partners (Pty) Ltd (Reg No: 2006/000338/07) ("GCP") respects your privacy and is committed to protecting your Personal Information and complying with applicable data protection and privacy laws. This Privacy Policy ("Policy") explains what data and information we process about you and your interactions with us securely, and tells you about your privacy rights and how the law protects you as a Data Subject.

**It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Information about you, so that you are fully aware of how and why we are using your information.**

**By submitting Personal Information to GCP, it will be seen as your Consent to us to process the Personal Information.**

### 1. INTRODUCTION

#### 1.1. Responsible Party

1.1.1. Greenlands Capital Partners (Pty) Ltd is the Responsible Party and responsible for your Personal Information (collectively referred to as "GCP", "we", "us" or "our" in this Privacy Policy).

1.1.2. We have appointed an Information Officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests, please contact the IO using the details set out below.

#### 1.2. Contact details

1.2.1 Our full contact details:

Full name of legal entity: Greenlands Capital Partners (Pty) Ltd ("GCP")

Information Officer: Brendan Arn Davids

Information Officer email address: [brendan@gcp.co.za](mailto:brendan@gcp.co.za)

Physical address: Unit B10, Westlake Square, 1 Westlake Drive, Tokai, 7945

Postal address: Postnet Suite 16, Private Bag X26, Tokai, 7966

Telephone numbers: +27 (0)21 701 2400 or +27 (0)82 555 8343

1.2.2. You have the right to make a complaint at any time to the Information Regulator's office (IR), the Republic of South Africa's authority for data protection issues ([www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)). **We would, however, appreciate the chance to deal with your concerns before you approach the IR so please contact us in the first instance.**

### 1.3. Changes to the Policy and your duty to inform us of changes

1.3.1. We keep our Policy under regular review. This version was last updated as per the date in the footer. Archived versions (if available) can be obtained by contacting us. Any changes made to our Policy in future will be posted on our website or made available during your engagement with Greenlands Capital Partners (Pty) Ltd. The new version will apply the moment it is published on our website or incorporated by reference in any communication.

1.3.2. It is important that the Personal Information we hold about you is accurate and current. **Please keep us informed if your Personal Information changes during your relationship with us.**

**1.4. Integration into other sites:** This Privacy Policy applies to our Sites and our electronic communications only. We do not exercise control over the sites which provide services or products to GCP as part of their own offering via our Sites. These sites may place their own cookies, or other files, on your computer, collect data or solicit Personal Information from you. We cannot be held responsible for any wrongful handling of end-users' information by other sites.

**1.5. Third-party links:** This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. If you disclose your Personal Information to a Third- Party, such as an entity which operates a website linked to this website or our social media sites, GCP 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. You should always ensure that you read the privacy policy of any Third-Party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

**2.1.** Personal Information means the information as per the Definitions set out below. Personal Information does not include data where the identity of the data subject has been removed (anonymous data).

**2.2.** We may process different kinds of Personal Information about you which we have grouped together as follows:-

2.2.1. **Identity Data** includes first name, last name, age, nationality, username or similar identifier, job title, date of birth and gender.

2.2.2. **Contact Data** includes billing address, delivery/ physical address, email address and telephone numbers.

2.2.3. **Financial Data** includes banking details and/or payment card details, income data and credit information.

2.2.4. **Special Personal Information** includes religious, biometric and health information.

2.2.5. **Transaction Data** includes details about payments to and from you and other details of products and services you have acquired from us or accessed on our website.

2.2.6. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

2.2.7. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

2.2.8. **Usage Data** includes information about how you use our website, products and services. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the products or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page, and any phone number used to call us and service transaction instructions from and to you.

2.2.9. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**2.3.** We also collect, use and share **Aggregated Data** and **Pattern Data** such as (but not limited to) statistical or demographic data for any purpose. (Aggregated Data could be derived from your Personal Information but is not considered Personal Information in law as this data will **not** directly or indirectly reveal a Data Subject's identity).

**2.4.** We do not collect **Special Personal Information** about the Data Subject, except for employment purposes and where you as a Data Subject may attend our premises, and then we only process same on receipt of your Consent.

**2.5. Submission of Personal Information on behalf of another:** If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person/ user before making the Personal Information available to us. On receipt of Personal Information we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person/ user, you indemnify us against any third-party claim, where such third party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.

**2.6. If you fail to provide Personal Information:** Where we need to collect Personal Information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Services, including Services for no charge). In this case, we may have to cancel a Service you have with us, but we will notify you if this is the case at the time.

### **3. HOW YOUR PERSONAL INFORMATION IS COLLECTED**

We use different methods to collect data from and about you including through:

**3.1. Direct interactions.** You may give us certain Personal Information directly, by:-

3.1.1. concluding a contract with us for delivery of services and/or products to you;

3.1.2. concluding a contract with us to acquire services and/or products from you (including employment agreement);

3.1.3. engage with us via Zoom, Skype, MS Teams or any other Video conferencing facility;

3.1.4. completion of a COVID19 questionnaire;

3.1.5. request marketing material from us;

3.1.6. give us feedback; or

3.1.7. contact us via email, WhatsApp or other social media sites messaging platforms we may subscribe to.

**3.2. Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions, device(s) and patterns. We collect this Personal Information by using cookies (see section 4 below), server logs and other similar technologies. We

may also receive Technical Data about you if you visit other websites employing our cookies.

**3.3. Third parties or publicly available sources.** We will receive Personal Information about you from various third parties and public sources as set out below:

3.3.1. Technical Data from the following parties:

3.3.1.1. analytics providers such as Google ("How Google uses information from sites or apps that use our services", (located at <https://policies.google.com/technologies/partner-sites>); and

3.3.1.2. advertising networks; and

3.3.1.3. search information providers.

3.3.2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

3.3.3. Identity and Contact Data from data brokers or aggregators.

3.3.4. Identity and Contact Data from publicly available sources such as CIPC.

## **4. COOKIES**

**4.1.** Our Sites make use of cookies to help us understand our users better. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies do not harm your computer or any files on your computer. Depending on the type of cookie we use, cookies also allow us to make our websites more user-friendly.

**4.2.** GCP may use third party vendors, including but not limited to Google and MSN/ Bing to show GCP-related advertisements ("ads") on sites on the internet. Third party vendors use cookies to serve ads based on a user's prior visits to Our sites or other websites. Users may opt-out of Google's use of cookies by visiting the Google Advertising Settings Page or the Network Advertising Initiative's opt-out page for other third-party vendors' use of cookies.

**4.3.** You should be able to adjust your browser so that your computer does not accept cookies. If you do this, you will still be able to browse the website but the functions that allow you to access an existing account or page that requires a username or password will not be available.

**4.4.** You can, alternatively, adjust your browser to notify you when a website attempts to put a cookie on your computer. How you adjust your browser to stop it accepting, or to notify you of, cookies will depend on the type of internet browser programme your computer uses.

**4.5.** Please remember, cookies do not contain Identity, Contacts or Financial Information. We do not exchange cookies with any third-party websites or external data suppliers.

## **5. HOW WE USE YOUR PERSONAL INFORMATION**

**5.1.** We will not sell your Personal Information.

**5.2.** We will only use your Personal Information within the framework of the law. Most commonly, we will use your Personal Information in the following circumstances:

5.2.1. Where you have given us your Consent; or

5.2.2. Where we need to perform the contract we are about to enter into or have entered into with you; or

5.2.3. Where it is necessary for the protection of the Data Subject's legitimate interest;

5.2.4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or

5.2.5. Where we need to comply with a legal obligation.

**5.3. Generally, we do not rely on Consent only as a legal basis for processing your Personal Information, although we will get your Consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.**

### **5.4. Purposes for which we will use your Personal Information**

5.4.1. We have set out below, in a table format, a description of all the ways we may use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate

5.4.2. Note that we may process your Personal Information for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal

ground we are relying on to process your Personal Information, where more than one ground has been set out in the table below.

<b>PURPOSE/ ACITIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING</b> including basis of legitimate interest
<ul style="list-style-type: none"> <li>New employment applications (permanent and temporary employees) or appointment as a new customer</li> </ul>	a) Identity b) Contact c) Financial d) Special personal information	<ul style="list-style-type: none"> <li>Consent Performance of a contract with you</li> </ul>
<ul style="list-style-type: none"> <li>To register you as a new customer and to process and deliver our services to you, including:               <ol style="list-style-type: none"> <li>Manage payments, fees and charges</li> <li>Collect and recover money owed to us;</li> <li>Notify you of changes to our privacy policy (if needed)</li> </ol> </li> </ul>	a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications	<ul style="list-style-type: none"> <li>Consent Performance of a contract with you</li> <li>Necessary to comply with legal obligation</li> <li>Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<ul style="list-style-type: none"> <li>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> </ul>	a) Identity b) Contact c) Technical	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>Necessary to comply with a legal obligation</li> </ul>



<ul style="list-style-type: none"> <li>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Profile</li> <li>d) Usage</li> <li>e) Marketing and Communications</li> <li>f) Technical</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
<ul style="list-style-type: none"> <li>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</li> </ul>	<ul style="list-style-type: none"> <li>a) Technical</li> <li>b) Usage</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
<ul style="list-style-type: none"> <li>To make suggestions and recommendations to you about goods or services that may be of interest to you.</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Technical</li> <li>d) Usage</li> <li>e) Profile</li> <li>f) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to develop our products/ services and grow our business)</li> </ul>

**5.5. Marketing:** We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.

#### 5.5.1. Promotional offers from us

##### 5.5.1.1. As a Customer:

5.5.1.1.1. When you acquired any of our Services or make use of our website (browse wrap agreement) we will deal with you as a customer under the POPIA;

5.5.1.1.2. We will use your Identity and Contact information to submit to you information/material of our other services and/or products that are related and that we feel may be of interest to you.

5.5.1.1.3. Important: you may ask us on submission of your Identity, and Contact information not to send you the above-mentioned information. At any time subsequent to our initial

Engagement, you can make use of the opting out options under par. 5.6.1 below;

#### 5.5.1.2. **Not a customer of GCP yet:**

5.5.1.2.1. We may collect through one of our employees or through our mailing system your email address; however

5.5.1.2.2. Before we use same for any direct marketing purposes, we will ask you for Consent (opt-in) prior to sending you direct marketing material.

#### 5.5.2. **Third-party marketing**

5.5.2.1. We will get your express opt-in consent before we share your Personal Information with any third party for marketing purposes.

**5.6. TAKE NOTE:** We may provide (without your consent) third party marketing parties/advertisers with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in Gauteng). We may make use of the Personal Information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

**IMPORTANT:** We do not disclose information about identifiable individuals to our advertisers.

#### 5.6.1. **Opting out**

5.6.1.1. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website or by contacting us at any time at: [credit@gcp.co.za](mailto:credit@gcp.co.za) and requesting to opt-out of our marketing services.

5.6.1.2. Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

#### 5.7. **Change of purpose**

5.7.1. We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If

you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5.7.2. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5.7.3. Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. DISCLOSURES OF PERSONAL INFORMATION

**6.1.** We may share your Personal Information with the parties set out below for the purposes set out in the table above.

6.1.1. **Internal Third Parties** as set out in the *Definitions*. Where we share your Personal Information to our Greenlands Capital Partners (Pty) Ltd group we will ensure your Personal Information is protected by requiring all our businesses falling under the Greenlands Capital Partners (Pty) Ltd group to follow this policy when processing your Personal Information.

6.1.2. **External third parties** as set out in the *Definitions*. We may provide such information to collaborating companies or other trusted businesses or persons for the purpose of processing Personal Information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

6.1.3. **Third parties** to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this privacy policy.

**6.2.** In accordance with the law. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

**6.3.** We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

## 7. INTERNATIONAL TRANSFERS

**7.1.** Some of our external third parties may be based outside the Republic of South Africa ("RSA") so their processing of your Personal Information could involve a transfer of data outside the RSA.

**7.2.** Whenever we transfer your Personal Information out of the RSA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

7.2.1. We will only transfer your Personal Information to countries that have been deemed to provide a similar level of protection for Personal Information as the RSA.

7.2.2. Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organizational measurements to protect your Personal Information.

7.2.3. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide protection to Personal Information similar to the conditions under the POPI Act, which we believe are good principles to ensure compliance.

**7.3.** By submitting your Personal Information to us you consent to the transfer of Personal Information outside the borders of the RSA (when required).

## 8. DATA SECURITY

**8.1.** We have put in place appropriate technological and organisational measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

**8.2.** We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

### For how long will we use your personal information?

**9.1.** We will only retain your Personal information for as long as reasonably necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

**9.2.** To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of the Personal Information, the purposes for which we process your Personal Information, and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

**9.3.** By law we have to keep basic information about our employees and/or customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers/ employees for tax purposes.

**9.4.** In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

**9.5.** In some circumstances we will anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. RECORDS

We will keep detailed, accurate and up-to-date written records regarding any Processing of Personal Information carried out, including but not limited to, the access, control and security of the Personal Information and approved subcontractors; the processing purposes; categories of processing; any transfers of Personal Information to a third party or another country and related safeguards; the instructions as received from our customers; and a general description of the technical and organisational security measures and retention and destruction of Personal Information.

## 11. SOCIAL MEDIA

**11.1.** Our website(s) may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook or Twitter (for example by registering an account), your activity

on our websites will also be made available to that social network. This is necessary for the performance of your contract with Us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to one of our websites or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter one of our websites, or change the necessary privacy settings, where possible.

**11.2.** Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

**11.3.** You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any). **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/CONCERNS TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**

**11.4.** Our social media network page(s) may share web links to relevant web pages. By default some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

## **12. YOUR LEGAL RIGHTS**

**12.1.** Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:

12.1.1. **Request access** to your Personal Information (commonly known as a "data subject access request"). Currently you have this right under the PAI Act. There may be a fee associated with this request – see below. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it. See the GCP Promotion of Access to Information Manual on our website [www.gcp.co.za](http://www.gcp.co.za) ("PAI Manual").

12.1.2. **Request correction** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold

about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**12.1.3. Request erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**12.1.4. Object to processing** of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**12.1.5. Request restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:

12.1.5.1. If you want us to establish the data's accuracy.

12.1.5.2. Where our use of the data is unlawful but you do not want us to erase it.

12.1.5.3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

12.1.5.4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**12.1.6. Request the transfer** of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**12.1.7. Withdraw consent at any time** where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness



of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**12.2. If you wish to exercise any of the rights set out above, please contact our Information Officer at the details mentioned in 1.2.1 above.**

**12.3. Fee required:** Apart from the prescribed fees under the PAI Act, you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**12.4. What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**12.5. Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 13. DEFINITIONS

**13.1. Consent:** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;

**13.2. Data Subject** means the person to whom Personal Information relates and, in this document, refers to you, as the party providing Personal Information that will be processed by Out of the Blue or a relevant third party.

**13.3. Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate



interests against any potential impact on you in respect of specific activities by contacting us.

**13.4. Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**13.5. PAI Act** means the Promotion of Access to Information Act, Act 2 of 2000.

**13.6. Personal Information** means information as defined under the POPI Act.

**13.7. POPI Act** means the Protection of Personal Information Act, Act 4 of 2013.

**13.8. Special Personal Information** means information as defined under section 26 of the POPI Act (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences).

### **13.9. THIRD PARTIES**

**13.9.1. Internal Third Parties:** Other divisions within Greenlands Capital Partners (Pty) Ltd, acting as joint responsible parties or operators and who are based in South Africa and who may also provide services and/or products similar to those of GCP and undertake leadership reporting.

#### **13.9.2. External Third Parties**

13.9.2.1. Service providers acting as operators who provide third-party services to GCP including services such as accounting and/or payroll system services.

13.9.2.2. Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

13.9.2.3. Skills development plan and training providers acting as operators providing training to employees. The South African Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties based in the Republic of South Africa who require reporting of processing activities in certain circumstances.

13.9.2.4. Court of law or any other authority where we have an obligation under law to share your Personal Information.

13.9.2.5. In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.

**END OF POLICY**