



Consider it done!
Libra Promotions (Pty) Ltd

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Tannery Industrial Park
Unit 56
309 Derdepoort Road
Silverton
www.libraproductions.co.za

LIBRA PRIVACY POLICY

INTRODUCTION

On 1 July 2021 the Protection of Personal Information Act, no 4 of 2013 (“the POPI Act”), became fully in operation. Your privacy is important to Libra promotions (Pty) Ltd (‘Libra’, ‘the company’, ‘we’ or ‘us’). We are committed to protecting your privacy and ensuring that your personal information is collected, processed and used properly and lawfully, in line with the POPI Act and other applicable data protection laws.

LIBRA – WHAT WE DO

Libra is a sales and marketing company that promotes a broad range of products, on behalf of distributors and suppliers, at retail and wholesale outlets. For this purpose we provide innovative brand communication solutions in order to increase brand awareness and influence the purchasing decision at point of sale.

In providing these services, we therefore, inter alia, maintain a large database of distributors, re-distributors and retail outlets (‘clients’, ‘customers’, ‘you’ or ‘your’).

PURPOSE OF THIS POLICY

This privacy notice aims to explain how we process your personal information under the applicable data protection laws that sets out how we manage the privacy of your information in our company. We are constantly updating our system processes and technology to ensure optimal data protection.

OUR DATA PROTECTION VALUES

When collecting, using, storing or sharing your personal information, the following is important to us:

1. Using your personal information in a way that is fair and trustworthy.
2. Transparency about what information we collect, what we do with it and who we share it with.
3. Working with you to promptly resolve any query or concern which you may have on how we use your information.



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4. Taking all reasonable steps to protect your information from misuse and keeping it secure.
5. Complying with all applicable data protection laws and regulations and cooperating with data protection authorities and regulators.

WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- Your marital status (like married, single, divorced), your national origin, your age, your language, birth, education;
- Your financial information, which may include your financial history (like your income or your buying, investing and banking behaviour based on, amongst others, account transactions);
- Your identifying number (like an account number, identity number or passport number);
- Your email address, location information, physical address (like residential address, work address or your physical location), and telephone number (including your cellular number, home landline or office work number);
- Your online identifiers such as social media profiles;
- Your biometric information (like fingerprints, signature or voice);
- Your race and gender;
- Your physical health, mental health, wellbeing, disability, religion, belief, conscience, culture.
- Your medical history (like your HIV/AIDS status and any medical history disclosed or obtained), criminal history, employment history;
- Your personal views, preferences and opinions;
- Your confidential correspondence; and
- Another's views or opinions about you and your name also constitute your personal information.

WHAT INFORMATION WE COLLECT

We collect your personal information to provide you with our services. To do this, we either enter into an agreement or accept a mandate from you, authorizing us to provide these services to you and on your behalf in relation to third parties.



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The type of personal information we collect will depend on the purpose for which it is collected and used. When you contact us, enter into an agreement with us or provide us with a mandate to provide services to you, we will collect only the personal information that we need to provide you with the services we have agreed upon.

We also collect information about your experiences over time as you use our website. This information is given to your browser by our web server when you visit our website.

COOKIES

When you use our website, we might gather standard internet visitor usage information. This we will do through using cookies and similar tools. Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a website which help websites remember information about your device and how you use the website.

We will use this information to:

- Monitor the areas of the website that are used most frequently for future website enhancements
- Temporarily store input information in our calculators, tools and other website functionality
- Display more focused advertising to a user by way of third party tools

USE OF YOUR PERSONAL INFORMATION

We will collect and process your personal information only for the purposes for which it was collected and as agreed, for example:

- to provide our services to you, as agreed upon
- to execute your transactions
- to maintain our relationship with you
- to conduct credit reference searches or verification with third parties
- to confirm and verify your identity or to verify that you are an authorized user for security purposes
- for the detection and prevention of fraud, crime, money laundering or other malpractice



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- to conduct market or customer satisfaction research and for statistical analysis
- for audit and record-keeping purposes
- to liaise with third-parties to offer services and products that form part of our services to you.
- in connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes. If you inform Libra that you do not want us to continue using your personal information, we will stop doing so.

We will therefore only process your personal information for lawful purposes related to our business and if the following circumstances apply:

- You have consented thereto;
- A person legally authorised by you, the law or a court, has consented thereto;
- It is necessary to conclude or perform under a contract we have with you, or to perform services to you as we agreed upon;
- The law requires or permits it;
- It is required to protect or pursue your legitimate interest, ours or that of a third party.

WHO WE SHARE YOUR INFORMATION WITH

We might occasionally disclose your personal information and share it with third parties who are involved in the delivery of products or services, giving effect to the terms of our agreement with you. We have agreements in place with the recipients to ensure that they also comply with applicable privacy and confidentiality laws. Libra conducts due diligence investigations into all new and existing brands and products offered by third parties on an ongoing basis.

We may legally disclose your personal information in circumstances where we have a duty or a right to disclose in terms of law or other industry codes, or where we believe it is necessary for pursuing our legitimate interests or that of a third party to whom your personal information is supplied.

Some of the brands and products that we promote at outlets are manufactured and supplied by third party distributors and suppliers that we work closely with, with whom we might have to share information, in order for us to fully perform our services to our customers. We treat information about our customers as confidential. Sharing this information with these other suppliers and distributors will only be done when necessary for the



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conclusion or performance of the agreement to which you are a party. Sharing of information further allows us to provide you with improved services and also allows us to meet your needs and expectations regarding the products and brands that we promote and market.

Libra will furthermore only share your personal information with such third parties if you have consented to such disclosure.

Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent

INFORMATION QUALITY AND SECURITY

We provide adequate protection to prevent unauthorized access and use of the personal information we store. We will continue to review our security controls and related processes and technology to ensure that your personal information is secure and used only in line with what is set out in this notice.

Our security policies and procedures include:

- physical security
- computer and network security
- secure communications
- security when contracting out activities or functions
- retention and disposal of information
- acceptable use of personal information
- governance and regulatory compliance
- monitoring access and usage of private information
- adequate protection of personal and identifiable information
- data portability
- investigating and reacting to security incidents



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Where we interact with third parties and share personal information, we take reasonable steps to impose appropriate security, privacy and confidentiality obligations on those recipients as processors of personal information. This is to ensure that personal information that we are responsible for, is kept secure and only processed lawfully.

CROSS BORDER SHARING

The disclosure of personal information to third parties might involve the transfer of personal information to other countries. Should this happen, Libra will ensure that your information be shared only under circumstances:

- Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient;
- Where the transfer is necessary to enter into, or perform, under a contract with you or a contract with a third party that is in your interest;
- Where you have consented to the transfer;

YOUR RIGHTS TO ACCESS AND CORRECTION OF INFORMATION

You have the right to request a copy of the personal information which we have on record for you. To do so, simply contact us at popi@librasm.co.za and specify what information you would like. Before we provide you with your personal information, we will take reasonable steps to confirm your identity.

Please note that such an access request may be subject to the payment of a legally allowable fee. You have the right to ask us to update or correct your personal information. You may do this by contacting any of our reps, managers or personnel at our back office.

We will take reasonable steps to confirm your identity before making changes to the personal information we may hold about you.

Keeping your personal information up-to-date and accurate remains your responsibility. If there are changes to your personal information such as a change in contact details or a residential address, please contact the relevant rep, manager, or personnel at our back office.



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RETENTION OF YOUR PERSONAL INFORMATION

You have the right to request that we erase or delete your personal information. However, this right is limited.

We will not retain your personal information for longer than is necessary for the purpose for which it was collected or processed. The period for which we retain your personal information is influenced by:

- your consent
- any compliance requirement in terms of legislation
- the retention of personal information for scientific, historical or statistical purposes
- for the establishment, exercise or defence of legal claims

PRIVACY COMPLAINTS, COMPLIMENTS OR COMMENTS

Where you have any questions, comments or concerns about how we deal with your personal information, you may request that we:

- do not contact you in future
- provide you with a copy of the personal information which we hold about you
- correct, update, or pseudonymise your personal information in our records
- investigate any alleged misuse of your personal information

HOW TO CONTACT US

If you have questions about this notice or need further information about our privacy practices or policy, please contact us at popi@librasm.co.za or the relevant rep, sales manager or personnel at the Libra back office.