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## Privacy policy

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### 1. Introduction

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**Barone, Budge & Dominick (Pty) Ltd** and its affiliates (collectively known as “BBD”) respect and acknowledge the importance of protecting your personal information.

This Privacy Policy sets out how BBD will process your personal information in the ordinary course of conducting the business of BBD and in addition applies to BBD's website.

### 2. What personal information we collect

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When you interact with us, we may collect personal information from you. You can choose not to provide personal information when requested. However, without your requested personal information, we may not be able to provide or continue to provide you with the products or services offered by BBD or allow you full access to our websites.

We will only collect the minimum personal information that we deem necessary to process for ordinary business purposes. Personal information we collect from you may include:

- your first and last or company name, email address, phone number and other contact information;
- log-in and account information for authentication purposes and account access;
- your marketing preferences;
- demographic data such as your gender, age, country and preferred language;
- data about how you and your PC or device interact with BBD, including web pages you visit when you use our websites and device, connectivity and configuration data.

It is not standard practice for us to collect sensitive personal information about you, such as information relating to your health, religion, political beliefs, race or sexual orientation, except with your express consent or unless we are required to do so by law.

If we link other data with your personal information as provided to us, we will treat that linked data as personal information.

### 3. How we collect personal information

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We may collect your personal information in a variety of ways when you interact with us, including when:

- you engage us to provide our products and services;
- you create an account with us;
- we respond to your inquiries and requests;
- as a result of communications between you and our representatives;
- we obtain feedback from you about our products and services;
- we conduct our administrative and business functions;

- you register for any of our events, workshops and seminars;
- you subscribe to our mailing lists and newsletters;
- we market our solutions and services to you;
- you access and use our websites;
- you apply for employment with us.

We may also collect your personal information from third party sources and third parties including public databases, business partners with whom we offer co-branded services or engage in joint marketing activities, and third parties that provide list enhancement or similar services, to the extent that this is permitted by applicable law.

## 4. Purposes for which we collect and use personal information

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We collect and use personal information to:

- send communications to you;
- establish, manage, and maintain our business relationships;
- respond to inquiries and requests;
- develop, provide, and improve our services and products;
- inform you about our services and solutions;
- obtain feedback from you on our services and solutions;
- provide you with a more personalised experience when you interact with us;
- conduct administrative and business functions;
- update our records and keep contact details up to date;
- enable you effectively to use and to improve our websites,
- compile website usage statistics;
- enable you to subscribe to newsletters and mailing lists;
- enable you to register for BBD events, workshops and seminars;
- recruit staff;
- assess the performance of our websites and to improve their operation;
- process and respond to privacy questions, concerns and complaints;
- fulfil legal and contractual obligations.

## 5. Sharing your personal information

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We may share your personal information for the purposes above with:

- our affiliates and subsidiaries who are similarly bound by this Privacy Policy;
- business partners, vendors, or contractors to provide requested services or facilitate transactions, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, and providing customer support. It is important to note that any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures and are not permitted to process personal information for any purpose other than the purpose for which they are given access;
- in connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;

- in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process.
- where necessary to comply with judicial proceedings, court orders or government orders.
- to protect the rights, property or safety of BBD, its business partners, you, or others, or as otherwise required by applicable law;
- where you consent to the sharing of your personal information.

## 6. Transfers across borders

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It may be necessary for us to process your personal information in other countries, either to carry out your instructions or for ordinary business purposes. These countries may not have the same level of protection as is required by South African law. Where this is the case, we will only process your personal information with your consent. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles, associated policies and practices.

## 7. Security of your personal information

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BBD is committed to protecting your personal information from misuse, loss, unauthorised access, modification or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same.

Whilst BBD makes every effort to secure its websites, you should note that the internet is not completely secure; thus when you submit or post personal information online, you should be aware that BBD cannot guarantee the security of any personal information that you submit or post online.

## 8. Direct marketing

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You can choose whether you wish to receive marketing communications from BBD by email, SMS, social media platforms and phone. Even when you have agreed to this, you may opt out of receiving future marketing materials from us at any time and manage your communication preferences by:

- following the unsubscribe instructions included in each marketing email or SMS text message from us; or
- sending an email to [crm@bbd.co.za](mailto:crm@bbd.co.za);

including your details and a description of the marketing material you no longer wish to receive from us. We will comply with your request as soon as is reasonably practicable. If you opt out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our websites, solutions or services.

We do not provide your personal information to unaffiliated third parties for direct marketing purposes or sell, rent, distribute or otherwise make personal information commercially available to any third party.

## 9. How you can access, correct, update, block or delete your personal information

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If you wish to access, correct, update, block, or delete personal information that we hold about you, please write to us using the contact details set out at the end of this Privacy Policy. We will respond within a reasonable period and at the latest within 30 days of the date of your request.

## 10. Cookies and Similar Technologies

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When you access our websites, we may use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage (HTML 5) to assist us to do things such as:

- enabling you to sign in;
- authenticating you;
- keeping track of information, you have provided to us;
- improving your browsing experience;
- customising our interactions with you;
- storing and managing your preferences and settings;
- compiling statistical data;
- analysing the performance and usability of our websites;
- measuring website traffic patterns;
- determining which areas of our websites have been visited.

These technologies collect information that your browser sends to our websites including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.

Our sites may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your online activities across our websites to help us compile aggregated statistics about the effectiveness of marketing campaigns or other business operations.

You can stop your browser from accepting cookies by changing the settings on your web browser. Be aware that restricting cookies may impact the functionality of our websites. We recommend that you allow cookies. On most browsers cookies are enabled by default. You can adjust the settings and options on your browser to disable or enable them, or visit <https://www.aboutcookies.org> for detailed information about managing cookies on various browsers.

## 11. Social media

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We operate and communicate through our designated channels, pages and accounts on some social media sites to inform, help and engage with our customers. We monitor and record comments and posts made about us on these channels so that we can improve our services.

The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users.

When you engage with us through social media, your personal information may be processed by the site owner; this processing occurs outside of our control and may take place in a country outside South Africa that may have different privacy regulations.

We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible, but cannot guarantee that we will read or reply to all messages sent to official BBD social media accounts.

Consistent feedback and helpful suggestions will be given to the relevant people within the company for consideration, but we cannot guarantee that any feedback or suggestions will be acted upon by BBD.

## 12. Links to third party websites and applications

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Our websites may contain links to sites and applications operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party site or application and we are not responsible for any third-party content or privacy statements. Your use of such sites and applications is subject to the relevant third-party privacy statements.

## 13. Retaining your personal information

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We retain your personal information for as long as is necessary to fulfil the purposes for which it was collected, or to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. Depending on the purpose, retention periods will vary. The criteria we use to determine retention periods include whether:

- we are under a legal, contractual or other obligation to retain personal information including pursuant to data retention laws, as part of an investigation or for litigation purposes;
- personal information is needed to provide our solutions and services business including performance improvement and to maintain accurate business and financial records;
- there are automated means to enable you to access and delete your personal information at any time. We will generally retain personal information for a shorter period of time, where this is not the case;
- the personal information is sensitive personal information in which event we will generally retain this for a shorter period of time;
- you have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.

## 14. Changes to our Privacy Policy

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We may update this Privacy Policy from time to time. Any updates of this Policy will be posted on the BBD website, together with an updated revision date. Unless otherwise stated, any new Privacy Policy will supersede the previous Policy.

## 15. How to contact us

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If you have any questions about how your personal information is handled by BBD, you have a privacy concern or you wish to make a complaint, please contact our Information Officer on [crm@bbd.co.za](mailto:crm@bbd.co.za)

This Privacy Policy was updated on 30 November 2017.