

Sizanani Privacy Policy

1. Introduction

Sizanani Site Logistics Pty (Ltd) and Sizanani Logistics (Pty) Ltd (collectively, “Sizanani”, “us” and “we”) understand the importance of protecting your personal information and we value and respect it.

This Privacy Policy describes -:

- How we collect and use your personal information
- With whom we share it
- Your choices and rights in relation to your personal information.

It applies to personal information that we collect from you physically or in a digital environment during your interactions with us, whether online, through our websites (including mobile sites) and mobile applications (collectively “internet services”) that link to this Privacy Statement, in writing or orally, or personal information that we may collect offline or receive from third parties.

2. Personal information we collect

Sizanani is subject to the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”), of which the operative provisions came into effect on 1 July 2020. Public and private bodies have until 1 July 2021 to be fully compliant. “personal information” is defined in POPIA as information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person, including but not limited to:

(a) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

(b) the preferences of the person;

(c) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(d) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Depending on how you interact with us, personal information we collect may include but without limitation:

- your name
- email address
- postal address
- telephone number (fixed or mobile) and
- log-in and account information for authentication purposes and account access.

We may also collect other information that does not personally identify you. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information, geographic location, and information collected through cookies and other technologies or information that has been anonymised or aggregated. If we link this information with your personal information, we will treat such linked information as personal information.

You can choose not to provide personal information to us when requested. However, if this is necessary to provide you with our solutions, products and services, access to our internet services, or to perform administrative functions, we may be unable to do this

3. How we collect your personal information

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

- When you access our internet services, or interact with us in any other way, or use our solutions, products and services.
 - We collect personal information when you register as a system user, you create an account with us, use our products and services, we process your orders and payment transactions, perform administrative and business functions.
- When you communicate with us.
 - We collect personal information when we respond to your inquiries and support requests, obtain feedback from you about our solutions, products and services.
- From third party sources.
 - We collect personal information from third parties, including transporters and insurance brokers and other third parties that provide services.

When you use our internet services, we may, and third parties we engage may collect data, including personal information through use of cookies and similar technologies. For more information, refer to the “Cookies and Similar Technologies” section below.

4. Legal basis for processing your personal information

When we process your personal information in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:

- Our legitimate interests (or those of a third party with whom we share your personal information) for the purpose of managing or operating the business purpose, except where such interests are overridden by your interests or fundamental rights or freedoms which require protection of personal information.
- Where this is necessary to comply with a legal obligation on us, whether contractually or otherwise.
- To protect the vital interests of any individual.
- Where you have consented for such processing to take place.

5. Use of your personal information

We may use your personal information to enable you to effectively use and to improve our solutions, products and services, for example to:

- Perform administrative and business functions and internal reporting.
- Send administrative information to you.
- Obtain feedback from you about our services, products and solutions including through client satisfaction surveys, in which event, we will only use your personal information for the sole purpose of sending you a survey.
- Respond to your inquiries and fulfil support requests by you.
- Assess the performance of our internet services and to improve their operation.
- Inform you about and provide you with our products, services and solutions.
- Update our records and keep your contact details up to date.

We engage in these activities to manage our relationship with you, to comply with our legal obligations, or for our legitimate business interests:

- Provide you with marketing materials and to personalise your experience with us, for example to:
 - Send marketing communications to you.
 - Enable you to register for Sizanani events, workshops and seminars.

We engage in these activities with your consent or for our legitimate business interests:

- Achieve our business purposes and analyse information, for example, to:
 - Establish, manage, and maintain our business relationship with you.
 - Compile usage statistics for our internet services to better our service to you.
 - Process and respond to privacy requests, questions, concerns and complaints.
 - Fulfil legal and contractual obligations.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation and for our legitimate business interests.

6. Your rights as a data subject

As a data subject you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information as referred to in Chapter 3 of POPIA, including the right:

- to be notified that:
 - personal information about you is being collected as provided for in terms of section 18; or
 - your personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22;
- to establish whether a responsible party holds personal information of you and to request access to your personal information as provided for in terms of section 23;
- to request, where necessary, the correction, destruction or deletion of your personal information as provided for in terms of section 24;
- to object, on reasonable grounds relating to your particular situation to the processing of your personal information as provided for in terms of section 11 (3) (a);
- to object to the processing of your personal information—
 - at any time for purposes of direct marketing in terms of section 11 (3) (b); or
 - in terms of section 69 (3) (c);
- not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69 (1);
- not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you as provided for in terms of section 71;
- to submit a complaint to the Regulator regarding the alleged interference with the protection of your personal information as a data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74; and
- to institute civil proceedings regarding the alleged interference with the protection of your personal information as provided for in section 99.

All references to sections above are to sections in POPIA.

7. Sharing your personal information

We may share your personal information for the purposes set out in this Privacy Statement (as applicable):

- With business partners with whom we offer co-services or engage in joint activities.
- With service providers to provide operational services or facilitate transactions using our internet service, including but not limited to processing of orders, client support, email delivery, data analytics and audit reporting.
- Where you consent to the sharing of your personal information.
- 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.
- For other legal reasons:
 - We may share your personal information 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; or
 - To protect the rights, property or safety of Sizanani, its business partners, you, or others, or as otherwise required by applicable law.

Any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.

8. Security of your personal information

Sizanani is committed to protecting your personal information from accidental or unlawful destruction, damage, loss, alteration, unauthorised access or disclosure by using reasonable, appropriate, physical, administrative and technical safeguards.

9. Cross border transfers

Sizanani may be required to fulfil its contractual obligations with you outside of South Africa and may transfer your personal information to countries where we do business or to international organisations in connection with the purposes identified above and in accordance with this Privacy Statement.

10. Cookies and Similar Technologies

When you access our internet services, we use cookies (small text files containing a unique identifying number which are placed on your PC or device) and similar technologies including scripts and embedded web links. We use these to assist us with activities such as:

- Enabling you to sign in to our internet services;
- 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 internet services; and
- Determining which areas of our internet services have been visited.

These technologies collect information that your browser sends to our internet services 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 functions you click.

11. Links to third party services, sites and applications

Our internet services may link to third-party services and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party services and applications. Your use of such services and applications is subject to the applicable third-party privacy statement and is at your own risk.

12. Direct marketing

We may send you direct marketing communications about our solutions, products and services. You can choose whether you wish to receive marketing communications from Sizanani by email. You may opt out of receiving marketing materials from us at any time and manage your communication preferences by:

- Following the unsubscribe instructions included in each marketing email from us; or
- Sending an email to the sender of the marketing communications; or writing to:
 - Sizanani Marketing
 - Subject: Unsubscribe
 - 11 7th Avenue, Edenvale, Johannesburg, South Africa, 1609
 - 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 products, solutions and services, which you will be unable to opt out of.

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.

13. Retaining your personal information

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

- We are under a legal, contractual or other obligation to retain personal information, or as part of an investigation or for litigation purposes;
- Personal information is needed to maintain accurate business and financial records;
- There are means to enable you to access and delete your personal information at any 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. Updates to this Privacy Policy

We may update this Privacy Policy at any time.

We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices.

16. How to contact us

If you have any complaints, requests or questions about how your personal information is handled by Sizanani, you have a privacy concern or you wish to make a request or a complaint relating to your personal information, please contact us.

You can reach us at:

- Sizanani Data Protection
- 11 7th Avenue, Edenvale, Johannesburg, South Africa, 1609
- Email: admin@sizanani.com

You also have the right to lodge a complaint with the Information Regulator

17. Last modified

2021/07/16