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PRIVACY NOTICE **AND** **INFORMED CONSENT NOTICE**

1. INTRODUCTION

The Protection of Personal Information Act, 4 of 2013 (POPIA) gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution.

Whilst Grove Precision Specialists (Pty) Ltd (hereafter referred to as “the Business”) is committed to protecting all person’s rights to privacy and who in consequence will ensure that all Personal Information is used appropriately, transparently, and according to applicable law, the Business must ensure that these rights to privacy are balanced with other rights such as the right to use and have access to the Business’ Information and Services, including its online and social media platforms and applications.

This Privacy Notice sets out the responsibilities and obligations of all persons who make use of, or access or receive the Business’ Information and Communications via its electronic communication facilities and resources including its website, email and social media platforms and how all users of these facilities and resources are to ensure that when using these resources that they respect and process another’s Personal Information lawfully and in accordance with the provisions of POPIA and the 8 Personal Information Processing Principles.

2. PURPOSE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice is to inform Data Subjects about how Grove Precision Specialists (Pty) Ltd Processes their Personal Information.

Grove Precision Specialists (Pty) Ltd, in its capacity as Responsible Party, shall strive to observe, and comply with its obligations under POPIA as well as accepted information protection principles, practices and guidelines when it processes Personal Information from or in respect of a Data Subject.

This Privacy Notice applies to Personal Information collected by Grove Precision Specialists (Pty) Ltd in connection with the products and services which the business provides. This includes information collected directly from you as a Data Subject, as well as information we collect indirectly through our service providers who collect your information on our behalf.

This Privacy Notice does not apply to the information practices of Third-Party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that the business does not manage or employ.

3. PROCESS OF COLLECTING PERSONAL INFORMATION

Grove Precision Specialists (Pty) Ltd collects Personal Information directly from Data Subjects as and when required for a defined purpose, which is described in our **Terms and Conditions as provided on our website**, and unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public, or the Personal Information is contained in or derived from a public record).

Grove Precision Specialists (Pty) Ltd will always collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy, and will Process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.

Grove Precision Specialists (Pty) Ltd often collects Personal Information directly from the Data Subject and/or in some cases, from Third Parties. Where the business obtains Personal Information from Third Parties, the business will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where the business is permitted to do so in terms of the applicable law, or as consented to in our **Terms and Conditions on our Website**. An example of such Third Parties includes: (i) recruitment agencies; (ii) other companies providing services to Grove Precision Specialists (Pty) Ltd ; and (iii) where Grove Precision Specialists (Pty) Ltd makes use of publicly available sources of information.

4. LAWFUL PROCESSING OF PERSONAL INFORMATION

Where Grove Precision Specialists (Pty) Ltd is the Responsible Party, it will only Process a Data Subject's Personal Information (other than for Special Personal Information) where –

- Consent of the Data Subject is obtained, whether by implication or in writing;
- Processing is necessary to carry out the actions for the conclusion of the selling of goods or equipment, the rendering of a required service, the collection of outstanding monies owed to us, or to institute legal action whether and when required, to which a Data Subject is party;
- Processing complies with an obligation imposed by law on the business;
- Processing protects a legitimate interest of the Data Subject; and/or
- Processing is necessary for pursuing the legitimate interests of Grove Precision Specialists (Pty) Ltd or of a third party to whom the information is supplied.

Grove Precision Specialists (Pty) Ltd will only Process Personal Information where one of the legal bases referred to above are present. Grove Precision Specialists (Pty) Ltd will make the manner and reason for which the Personal Information will be Processed clear to the Data Subject.

Where the business is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to the business Processing of the Personal Information at any time.

However, this will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent or any Processing justified by any other legal ground provided under POPIA.

If the consent is withdrawn or if there is otherwise a justified objection against the use or the Processing of such Personal Information, Grove Precision Specialists (Pty) Ltd will ensure that the Personal Information is no longer Processed.

5. SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN

Special Personal Information is sensitive Personal Information of a Data Subject and Grove Precision Specialists (Pty) Ltd acknowledges that it will generally not Process Special Personal Information unless –

- Processing is carried out in accordance with the Data Subject's consent or Mandate;
- Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- Processing is for historical, statistical or research purposes, subject to stipulated safeguards;
- Information has deliberately been made public by the Data Subject; or
- Specific authorisation applies in terms of POPIA.

Grove Precision Specialists (Pty) Ltd acknowledges that it may not Process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where it is permitted to do so in accordance with applicable laws.

6. PURPOSE FOR PROCESSING PERSONAL INFORMATION

Grove Precision Specialists (Pty) Ltd understands its obligation to make Data Subjects aware of the fact that it is Processing their Personal Information and inform them of the purpose for which Grove Precision Specialists (Pty) Ltd processes such Personal Information.

Grove Precision Specialists (Pty) Ltd will only Process a Data Subject's Personal Information for a specific, lawful, and clear purpose, which is summarised in paragraph 4 above, and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible. It will ensure that there is a legal basis for the Processing of any Personal Information. Grove Precision Specialists (Pty) Ltd will ensure that Processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).

Grove Precision Specialists (Pty) Ltd will generally use Personal Information for purposes required to operate in conduction business upon request and at the instance of the Data Subject's request, and these purposes include one or more of the following non-exhaustive purposes:-

- for rendering services to the Data Subject
- to order equipment on behalf of the Data Subject
- for selling goods and equipment to the Data Subject
- for purposes collecting any outstanding amount due by the Data Subject to Grove Precision Specialists (Pty) Ltd
- to enforce the Terms and Conditions of Sale as per website
- to do a Credit Check for the purposes of opening a Cash Account
- to do employment confirmation
- for the purposes of responding to your requests
- to communicate with you
- to protect further legitimate interests of Grove Precision Specialists (Pty) Ltd

7. KEEPING PERSONAL INFORMATION ACCURATE

Grove Precision Specialists (Pty) Ltd will take reasonable steps to ensure that all Personal Information is kept as accurate, complete, and up to date, as reasonably possible, depending on the purpose for which Personal Information is collected or further processed.

Grove Precision Specialists (Pty) Ltd may not always expressly request the Data Subject to verify and update his/her/its Personal Information unless this process is specifically necessary.

Grove Precision Specialists (Pty) Ltd, however, expects that the Data Subject will notify Grove Precision Specialists (Pty) Ltd from time to time in writing of any updates required in respect of his/her/its Personal Information.

8. STORAGE AND PROCESSING OF PERSONAL INFORMATION BY GROVE PRECISION SPECIALISTS (PTY) LTD AND THIRD-PARTY SERVICE PROVIDERS

Grove Precision Specialists (Pty) Ltd may store your Personal Information in hardcopy format and/or in electronic format using Grove Precision Specialists (Pty) Ltd's own secure on-site servers or other internally hosted technology. Your Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom Grove Precision Specialists (Pty) Ltd has contracted with, to support Grove Precision Specialists (Pty) Ltd's operations as a business.

Grove Precision Specialists (Pty) Ltd's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be Processed. Grove Precision Specialists (Pty) Ltd will ensure that such Third-Party service providers will Process the Personal Information in accordance with the provisions of this Privacy Notice, all other relevant internal policies and procedures and POPIA. These Third Parties do not use or have access to the Data Subject's Personal Information other than for purposes specified by Grove Precision Specialists (Pty) Ltd and requires such parties to employ at least the same level of security that Grove Precision Specialists (Pty) Ltd uses to protect the Data Subject's personal data.

Grove Precision Specialists (Pty) Ltd will not share your personal information with another, third-party companies for their commercial or marketing purposes without your

consent or except as part of a specific program or feature which you will specifically be able to opt-out of.

9. RETENTION OF PERSONAL INFORMATION

Grove Precision Specialists (Pty) Ltd may keep records of the Personal Information, correspondence, or comments it has collected in an electronic or hardcopy file format.

In terms of POPIA, Grove Precision Specialists (Pty) Ltd may not retain Personal Information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved.

This prohibition will not apply in the following circumstances –

- where the retention of the record is required or authorised by law or by any Government authority;
- Grove Precision Specialists (Pty) Ltd requires the record to fulfil its lawful functions or activities;
- Retention of the record is required by a contract between the parties thereto;
- The Data Subject (or competent person, where the Data Subject is a Child) has consented to such longer retention;
- The record is retained for historical, research, archival or statistical purposes provided safeguards are put in place to prevent use for any other purpose.
- Accordingly, Grove Precision Specialists (Pty) Ltd will, subject to the exceptions noted in this Privacy Notice, retain Personal Information for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.

Where Grove Precision Specialists (Pty) Ltd retains Personal Information for longer periods for statistical, historical, archival or research purposes, and Grove Precision Specialists (Pty) Ltd will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Privacy Notice and applicable laws.

Once the purpose for which the Personal Information was initially collected and processed no longer applies or becomes obsolete, Grove Precision Specialists (Pty) Ltd will ensure that the Personal Information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such Personal Information. In instances where we de-identify your Personal Information, Grove Precision Specialists (Pty) Ltd may use such de-identified information indefinitely.

10. FAILURE TO PROVIDE PERSONAL INFORMATION

Should Grove Precision Specialists (Pty) Ltd need to collect Personal Information by law or under its obligations as a business, and you fail to provide the Personal Information when requested, we may be unable to perform our duties in terms of your request to buy goods or equipment from us, or to render any services to you.

Should Grove Precision Specialists (Pty) Ltd need to collect Personal Information for any of the purposes set out in this notice, and you fail to provide the Personal Information when requested, your failure to provide such Personal Information may have negative consequences, including that Grove Precision Specialists (Pty) Ltd may not be able to effectively perform its obligations in terms of the selling of goods or equipment or rendering a service (where Grove Precision Specialists (Pty) Ltd needs to Process your Personal Information in order to perform its obligations as a precision specialist) to you. You will be notified when this is the case.

11. SAFE-KEEPING OF PERSONAL INFORMATION

Grove Precision Specialists (Pty) Ltd shall preserve the security of Personal Information and prevent its alteration, loss and damage, or access by non-authorised third parties.

Grove Precision Specialists (Pty) Ltd will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access, and unauthorised destruction of Personal Information.

Grove Precision Specialists (Pty) Ltd has implemented physical, organisational, contractual, and technological security measures (having regard to generally accepted information security business or industry specific requirements or professional rules) to keep all Personal Information secure, including measures protecting any Personal Information from loss or theft, and unauthorised access, disclosure, copying, use or modification. Further, Grove Precision Specialists (Pty) Ltd maintains and regularly verifies that the security measures are effective and regularly updates same in response to new risks.

12. BREACHES OF PERSONAL INFORMATION

A Data Breach refers to any incident in terms of which reasonable grounds exist to believe that the Personal Information of a Data Subject has been accessed or acquired by any unauthorised person.

A Data Breach can happen for many reasons, which include loss or theft of data or equipment on which Personal Information is stored; inappropriate access controls allowing unauthorised use; equipment failure; human error; unforeseen circumstances, such as a fire or flood; deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or alteration of Personal Information without permission and loss of availability of Personal Information.

Grove Precision Specialists (Pty) Ltd address any Data Breach in accordance with the terms of POPIA. Grove Precision Specialists (Pty) Ltd will notify the Regulator and the affected Data Subject (unless the applicable law or a government authority requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal

Information. Grove Precision Specialists (Pty) Ltd will provide such notification as soon as reasonably possible after it has become aware of any Data Breach in respect of such Data Subject's Personal Information.

13. PROVISION OF PERSONAL INFORMATION TO THIRD PARTY SERVICE PROVIDERS

Grove Precision Specialists (Pty) Ltd may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this Privacy Notice, and POPIA.

Grove Precision Specialists (Pty) Ltd notes that such Third Parties may assist Grove Precision Specialists (Pty) Ltd with data storage; to assist Grove Precision Specialists (Pty) Ltd with auditing processes (external auditors); for providing outsourced services to Grove Precision Specialists (Pty) Ltd, including in respect of its (i) legal, (ii) data storage requirements and (iii) upskilling of its Employees; and/or to notify the Data Subjects of any pertinent information concerning Grove Precision Specialists (Pty) Ltd .

Grove Precision Specialists (Pty) Ltd will disclose Personal Information with the consent of the Data Subject or if Grove Precision Specialists (Pty) Ltd is permitted to do so without such consent in accordance with applicable laws.

Further, Grove Precision Specialists (Pty) Ltd may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.

The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction, if and to the extent such Processing does occur, may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement, or regulatory agencies of such other country, pursuant to the laws of such country.

Grove Precision Specialists (Pty) Ltd may however, release your personal information for the following reasons:

- to the extent we have a good-faith belief that such action is necessary to comply with any applicable law;
- to enforce any provision of the Terms and Conditions, to protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare;
- when disclosure is required to maintain the security and integrity of the Service, or to protect any user's security or the security of other persons, consistent with applicable laws;
- in the event that we go through a business transition, such as merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets

14. ACCESS TO PERSONAL INFORMATION

POPIA read with the relevant provisions of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") confers certain access rights on Data Subjects.

These rights include –

a right of access: a Data Subject having provided adequate proof of identity has the right to: (i) request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information.

a right to request correction or deletion: a Data Subject may also request Grove Precision Specialists (Pty) Ltd to correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of Personal Information about the Data Subject that Grove Precision Specialists (Pty) Ltd is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

a right to withdraw consent and to object to processing: a Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw such consent and may do so by providing Grove Precision Specialists (Pty) Ltd with notice to such effect at the address set out below. Further, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it.

Accordingly, Grove Precision Specialists (Pty) Ltd may request the Data Subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the Data Subject's Personal Information. Any such identifying information shall only be used for the purpose of facilitating access to or information regarding the Personal Information.

The Data Subject can request in writing to review any Personal Information about the Data Subject that Grove Precision Specialists (Pty) Ltd holds including Personal Information that Grove Precision Specialists (Pty) Ltd has collected, utilised or disclosed.

Grove Precision Specialists (Pty) Ltd shall respond to these requests in accordance with POPIA and PAIA and provide the Data Subject with any such Personal Information to the extent required by law and any of Grove Precision Specialists (Pty) Ltd policies and procedures which apply in terms of the PAIA.

15. CHANGES TO THIS PRIVACY NOTICE

Grove Precision Specialists (Pty) Ltd reserves the right to make amendments to this Privacy Notice from time to time and will use reasonable efforts to notify Data Subjects of such amendments.

The current version of this Privacy Notice will govern the respective rights and obligations between the Data Subject and Grove Precision Specialists (Pty) Ltd each time that the Data Subject interacts with Grove Precision Specialists (Pty) Ltd .

16. CONTACT INFORMATION

Information Officer

Gerda Grove acts as the Information Officer in terms of S56 of POPIA, read with S17 of PAIA.

The Information Officer should be the first point of contact for any queries regarding this framework or any of the policies contained herein.

The Information Officer's details are as follows:

Gerda Grove, 4 Vygie Street, Balkfontein, Bothaville, 9660

Cell nr: 060 980 9816

E-mail: gerda@gpsmail.co.za

The Information Regulator

If a Data Subject is not satisfied with the way Grove Precision Specialists (Pty) Ltd addresses any complaint with regard to Grove Precision Specialists (Pty) Ltd ' Processing of Personal Information, the Data Subject can contact the office of the Regulator.

Tel: 012 – 406 4818, Fax: 086 500 3351, Email: infoereg@justice.gov.za,

Website: <http://justice.gov.za/infoereg/>



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